APPENDIX A
NOTICE OF PREPARATION

This appendix provides supporting documentation for the Notice of Preparation (NOP) and written comments on the NOP. SANDAG published the NOP for the EIR on December 14, 2012. Table A-1 identifies all comment letters received. Table A-2 summarizes the issues raised in the 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.

Table A-1
Identification Chart for NOP Comment Matrix

<table>
<thead>
<tr>
<th>Identification Letter</th>
<th>Organization or Individual</th>
<th>Date</th>
<th>Comment Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>California Department of Fish and Wildlife</td>
<td>February 15, 2013</td>
<td>A-1 through A-20</td>
</tr>
<tr>
<td>B</td>
<td>California Department of Parks and Recreation</td>
<td>February 14, 2013</td>
<td>B-1 through B-7</td>
</tr>
<tr>
<td>C</td>
<td>City of San Diego Development Services Department, Transportation Development and Environmental Analysis Sections</td>
<td>February 15, 2013</td>
<td>C-1 through C-9</td>
</tr>
<tr>
<td>D</td>
<td>Descanso Planning Group</td>
<td>January 16, 2013</td>
<td>D-1 through D-5</td>
</tr>
<tr>
<td>E</td>
<td>Cleveland National Forest Foundation</td>
<td>February 15, 2013</td>
<td>E-1 through E-6</td>
</tr>
<tr>
<td>F</td>
<td>County of San Diego Planning and Development Services</td>
<td>February 15, 2013</td>
<td>F-1 through F-2</td>
</tr>
<tr>
<td>G</td>
<td>EnviroMine</td>
<td>February 13, 2013</td>
<td>G-1 through G-9</td>
</tr>
<tr>
<td>H</td>
<td>Private Citizen – Jim Varnadore</td>
<td>January 10, 2013</td>
<td>H-1 through H-6</td>
</tr>
<tr>
<td>I</td>
<td>Move San Diego</td>
<td>February 15, 2013</td>
<td>I-1 through I-18</td>
</tr>
<tr>
<td>J</td>
<td>Native American Heritage Commission (NAHC)</td>
<td>December 18, 2012</td>
<td>J-1 through J-10</td>
</tr>
<tr>
<td>K</td>
<td>Unified Port of San Diego</td>
<td>March 26, 2013</td>
<td>K-1 through K-5</td>
</tr>
<tr>
<td>L</td>
<td>SD 350.org</td>
<td>February 15, 2013</td>
<td>L-1 through L-23</td>
</tr>
<tr>
<td>M</td>
<td>Metrolink</td>
<td>January 3, 2013</td>
<td>M-1 through M-2</td>
</tr>
<tr>
<td>N</td>
<td>City of San Marcos – Susan Vandrew Rodriguez, Associate Planner</td>
<td>February 14, 2013</td>
<td>O-1</td>
</tr>
</tbody>
</table>
### Table A-2

#### NOP Comment Summary

<table>
<thead>
<tr>
<th>#</th>
<th>Subject Raised</th>
<th>Where Addressed in EIR or Other Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>A-1</td>
<td>Identify SR-241 toll road on regional maps, and describe past significant concerns to this roadway in the PEIR.</td>
<td>The SR 241 toll road is included in the list of cumulative projects analyzed in Chapter 5.0 Cumulative Impacts. Environmental impacts of the SR 241 toll road are considered as part of the analysis of the Proposed Plan’s cumulative impacts.</td>
</tr>
<tr>
<td>A-2</td>
<td>Department opposes development or conversion which would result in a reduction of wetland acreages or habitat values, unless, at a minimum project mitigation assures “no net loss” of either wetland habitat values or acreage. All wetlands and watercourses should be retained and provided with setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures must be included in the PEIR and must compensate for loss of function and value of a corridor. A jurisdictional delineation should be included in PEIR.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources.</td>
</tr>
<tr>
<td>A-3</td>
<td>Provide written notification for 1600 et seq activities. Document should identify potential impacts to stream and riparian resources, as well as MMR commitments.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources.</td>
</tr>
<tr>
<td>A-4</td>
<td>Seek appropriate CESA “take” authorizations, if necessary, and additional appropriate steps.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources.</td>
</tr>
<tr>
<td>A-5</td>
<td>Include discussion of purpose and need for proposed project including staging area and access routes to construction and staging areas.</td>
<td>Chapter 2.0 Project Description</td>
</tr>
<tr>
<td>A-6</td>
<td>Consider and evaluate full range of alternatives.</td>
<td>Chapter 6.0 Alternatives Analysis</td>
</tr>
<tr>
<td>A-7</td>
<td>EIR should include information on regional setting.</td>
<td>Chapter 3.0 Environmental Setting and Sections 4.1 through 4.16.</td>
</tr>
<tr>
<td>A-8</td>
<td>EIR should include an assessment of rare plants and natural communities.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources.</td>
</tr>
<tr>
<td>A-9</td>
<td>EIR should include inventory of biological resources associated with each habitat type on site and within APE.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources, Appendix E</td>
</tr>
<tr>
<td>A-10</td>
<td>EIR should include inventory of rare, threatened, endangered, and sensitive species on site and within APE.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources, Appendix E</td>
</tr>
<tr>
<td>A-11</td>
<td>EIR should include discussion of impacts from lighting, noise, human activity, exotic species, drainage, and groundwater dewatering.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.10 Hydrology and WQ, Section 4.12 Noise and Vibration</td>
</tr>
</tbody>
</table>
### Appendix A: Notice of Preparation

<table>
<thead>
<tr>
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<th>Where Addressed in EIR or Other Response</th>
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<tbody>
<tr>
<td>A-12</td>
<td>Include discussion on indirect project impacts on biological resources and impacts on wildlife corridors/movement areas.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources</td>
</tr>
<tr>
<td>A-13</td>
<td>Include discussion of possible conflicts between zoning and wildlife, and mitigation measures.</td>
<td>Chapter 4.0, Section 4.4 Biological Resources</td>
</tr>
<tr>
<td>A-14</td>
<td>Include cumulative effects analysis.</td>
<td>Chapter 5.0 Cumulative Impacts Analysis</td>
</tr>
<tr>
<td>A-15</td>
<td>Include measures to avoid and protect rare natural communities.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources</td>
</tr>
<tr>
<td>A-16</td>
<td>Include mitigation for adverse impacts to sensitive plants, animals, and habitats.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources</td>
</tr>
<tr>
<td>A-17</td>
<td>Include measures to perpetually protect targeted habitat in preservation or restoration areas from direct and indirect impacts.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources</td>
</tr>
<tr>
<td>A-18</td>
<td>Require the clearing of vegetation outside nesting/breeding season, and if not feasible, implement mitigation measures.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources</td>
</tr>
<tr>
<td>A-19</td>
<td>Department does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to sensitive species.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources</td>
</tr>
<tr>
<td>A-20</td>
<td>Restoration and revegetation plans should be prepared with expertise and include 10 specified items.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources</td>
</tr>
</tbody>
</table>

**California Department of Parks and Recreation**

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<tr>
<td>B-1</td>
<td>Rail and road projects increase noise and vibration in parklands and areas important to wildlife. Habitat loss should be avoided and connectivity preserved.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources, Section 4.12 Noise and Vibration address noise impacts to special status wildlife and their habitat.</td>
</tr>
<tr>
<td>B-2</td>
<td>Noise and vibration impacts to the serenity of cultural areas.</td>
<td>Chapter 4.0, Section 4.12 Noise and Vibration addresses noise impacts to noise sensitive receptors, which can include passive recreational area (places of reflection and contemplation), which are determined by local jurisdictions general plan and ordinance; Section 4.5 Cultural and Paleontological Resources</td>
</tr>
<tr>
<td>B-3</td>
<td>Development could contribute to cumulatively significant impacts to public viewsheds.</td>
<td>Chapter 4.0, Section 4.1 Aesthetics, Chapter 5.0 Cumulative Impacts Analysis</td>
</tr>
<tr>
<td>B-4</td>
<td>The impact of hydrological changes on wetlands (impermeable surface). Design guidelines and mitigation must be implemented to reduce sediment and freshwater flows to downstream estuarine systems.</td>
<td>Chapter 4.0 Environmental Impact Analysis, Section 4.4 Biological Resources, Section 4.10 Hydrology and Water Quality</td>
</tr>
<tr>
<td>B-5</td>
<td>Consider local and regional implications of habitat restoration and mitigation. Regional approach to mitigation must be considered only after full analysis of mitigation opportunities and constraints within the affected watershed.</td>
<td>Chapter 4.0, Section 4.4 Biological Resources Biological impact mitigation measures address habitat restoration and mitigation, and are broad enough to encompass suggested approaches.</td>
</tr>
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</tr>
<tr>
<td>B-6</td>
<td>Transportation corridors support invasive plant species and provide pathways for their movement. An integrated invasive plant control plan should be designed and implemented on a regional scale.</td>
<td>Chapter 4.0, Section 4.4 Biological Resources Biological impact mitigation measures address habitat restoration and mitigation, and are broad enough to encompass suggested approaches.</td>
</tr>
<tr>
<td>B-7</td>
<td>South Carlsbad land swap project may need supplemental funding and would benefit from being included in the framework of the Regional Plan.</td>
<td>Funding for this land swap project is not included in the proposed Plan and therefore is not evaluated in the EIR.</td>
</tr>
</tbody>
</table>

**City of San Diego Development Services Department, Transportation Development Section**

| C-1 | Transportation Impact Analysis should follow guidelines of the *City of SD Traffic Impact Study Manual*                                                              | The transportation analysis is provided at a region-wide program level analysis and therefore does not follow the Traffic Impact Study Manual.                                                                                                                                                                                                 |
| C-2 | Transportation Impact Analysis should apply *City of San Diego Significance Determination Thresholds*                                                                 | As described in Section 4.15 Transportation, program level significance criteria were specifically developed for this EIR.                                                                                                                                                                                                                           |
| C-3 | Transportation Impact Analysis should evaluate the San Ysidro/Otay Mesa border transportation system and include efforts to improve access to border crossings for transit passengers, pedestrians, and vehicles. | As described in Section 4.15 Transportation, the transportation analysis evaluates the regional transportation system, including improvements identified in the proposed Plan that promote access at international ports of entry. |
| C-4 | Transportation Impact Analysis should evaluate regional truck facilities to minimize impacts on local streets and arterials                                | The transportation analysis evaluates the planned transportation network improvements identified in the proposed Plan, which includes improvements that support the regional movement of goods via truck.                                                                                                     |
| C-5 | Transportation Impact Analysis should evaluate policies to improve bicycling and recommend a system of safe, convenient, regionally significant bike facilities.                                              | Chapter 2.0 Project Description identifies the active transportation projects, including bicycling facilities that are included in the proposed Plan. Chapter 4.0, Section 4.15 Transportation, evaluates the performance of bicycle facilities.                                                                                           |
| C-6 | Transportation Impact Analysis should evaluate the provision of regional freeway to freeway connectors to minimize impact of regional trips on local street networks.                           | Chapter 2.0 Project Description identifies the freeway connectors that are included in the proposed Plan.                                                                                                                                                                                                                                    |
| C-7 | Transportation Impact Analysis should discuss and evaluate any loss of on-street parking, effects on supply of on-street residential parking, and whether the loss of parking would impede accessibility of public facility.        | Chapter 4.0, Section 4.15 Transportation includes an analysis of impacts to on-street parking.                                                                                                                                                                                                                                           |
| C-8 | Environmental document should include alternatives that avoid or lessen transportation impacts, including at least one alternative that would avoid significant impacts to the City’s street and transit systems. | Chapter 6.0 Alternatives Analysis discusses alternatives that avoid or lessen transportation impacts, including an alternative that would avoid significant impacts to the City’s street and transit systems.                                                                                          |

**City of San Diego Development Services Department, Environmental Analysis Section**

<p>| C-9 | Environmental document should consider the City’s Significance Determination Thresholds and General Plan Policies when evaluating impacts in City boundaries. Appropriate mitigation should be proposed consistent with all applicable City guidelines. | As described in Section 4.15 Transportation, program level significance criteria were specifically developed for this EIR.                                                                                                                                                                                                 |</p>
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<tr>
<td>D-1</td>
<td>Improving transportation and safety by improving Camp Oliver Bridge on Riverside Dr. Large vehicles cannot pass one another safely. Needs pedestrian walkway.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. The Active Transportation Program and pedestrian enhancements are described in Chapter 2.0 Project Description.</td>
</tr>
<tr>
<td>D-2</td>
<td>Improve recreation with safe walking path around Descanso (currently pedestrians must walk on the road).</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan.</td>
</tr>
<tr>
<td>D-3</td>
<td>Improve recreation by improving facilities at Descanso Elementary joint-use-facility which is the areas only park.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Associated infrastructure to serve regional growth and land use changes are discussed in Chapter 2.0 Project description.</td>
</tr>
<tr>
<td>D-4</td>
<td>Improve public service and utility by increasing cell phone coverage and internet access. A safety issue when power is out.</td>
<td>This comment does not directly address the scope of the EIR. Cell phone coverage and internet access are not part of the project objectives. Public services and utilities are addressed in Chapter 4.0 Section 4.14.</td>
</tr>
<tr>
<td>D-5</td>
<td>Analyze water quality and supply. Descanso water comes from wells – many have gone dry in drought.</td>
<td>Chapter 4.0, Section 4.10 Hydrology and WQ, Section 4.16 Water Supply</td>
</tr>
</tbody>
</table>
| E-1| Disclose all modeling assumptions to the public early in the process. Base all modeling assumptions on substantial evidence, and disclose that evidence to the public early in the process.                                                | The entire SANDAG travel modeling system is available on GitHub (http://github.com/SANDAG/ABM). The modeling system has been available on GitHub since the summer of 2013. SANDAG has announced the availability of the software on the 2050 RTP website as part of the progress report on the 2050 RTP implementation.  

SANDAG holds two transportation modeling forums a year to discuss model development and model implementation with interested stakeholders. The forums began in December 2011 and cover ABM and PECAS development topics including model estimation and model calibration. All of the PowerPoints are available on the SANDAG modeling site (http://www.sandag.org/models).  

The full travel model documentation, including all assumptions based on substantial evidence, is available as Appendix T of the Regional Plan. |
<table>
<thead>
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<tbody>
<tr>
<td>E-2</td>
<td>Evaluate an alternative that considers full integration of land use and transportation planning: public transit and non-auto based modes working in tandem with land use development policies that result in livable, sustainable communities.</td>
<td>Chapter 6.0 Alternatives Analysis describes alternatives to the proposed Plan, including integrated alternatives that advance the implementation of public transit and active transportation investments and increase residential densities and employment intensities in strategic areas with the objective of reducing total vehicle miles traveled (VMT).</td>
</tr>
<tr>
<td>E-3</td>
<td>Develop alternatives that place density where density exists and where transit exists or is planned. Focus new growth solely within true urban centers, not according to the Smart Growth Concept Map.</td>
<td>Please see the response to comment E-2.</td>
</tr>
<tr>
<td>E-4</td>
<td>Develop alternatives that take advantage of areas with high density mixed use zoning that could achieve much higher transit mode share as identified in the Urban Area Transit Strategy.</td>
<td>Please see the response to comment E-2.</td>
</tr>
<tr>
<td>E-5</td>
<td>Include reduction of greenhouse gas emissions to sustainable levels as determined by AB32 and S-3-05 in the Project Description.</td>
<td>Chapter 2.0 Project Description describes the basic objectives of the project, which include meeting GHG emissions targets for passenger cars and light-duty trucks. Section 4.8 Greenhouse Gas Emissions includes significance criteria and impact analysis based on AB 32 and Executive Order S-3-05.</td>
</tr>
<tr>
<td>E-6</td>
<td>The current EIR failed to achieve the standards set forth by the state of California because of a land use transportation plan that in effect increased emissions over the life of the plan.</td>
<td>This comment does not pertain to the environmental impacts of this proposed Plan and contents of this EIR, so it is not addressed in this EIR.</td>
</tr>
</tbody>
</table>

**County of San Diego Planning and Development Services**

<table>
<thead>
<tr>
<th>F-1</th>
<th>EIR should take into consideration County’s updated General Plan and Mobility Element.</th>
<th>The Series 13 Regional Growth Forecast is based on adopted general plans, including the County General Plan. The mobility elements (i.e., circulation elements) of the County and cities are included in the regional transportation model.</th>
</tr>
</thead>
<tbody>
<tr>
<td>F-2</td>
<td>When the plan addresses the transportation needs of the region, the County’s Mobility Element should be used as primary resource in determining needs of unincorporated areas.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. The draft EIR addresses transportation impacts in Chapter 4.0, Section 4.15 Transportation.</td>
</tr>
</tbody>
</table>

**EnviroMine**

<p>| G-1 | Include construction aggregate resources in regional planning efforts.                                                                                                                                    | Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources                                                                                                                                                                                                                                                                                                                                 |
| G-2 | To minimize transportation costs and environmental impacts from transporting material, aggregate should be located and permitted near the area of consumption. | Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources                                                                                                                                                                                                                                                                                                                                 |</p>
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<tbody>
<tr>
<td>G-3</td>
<td>Information from the San Diego Region Aggregate Study should be considered when developing the regional plan (benefits of local supplies, including GHG reduction).</td>
<td>Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources; Section 4.8 GHG</td>
</tr>
<tr>
<td>G-4</td>
<td>Regional planning efforts should consider the location of high quality aggregate resources as well as the long term demand for these materials.</td>
<td>Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources</td>
</tr>
<tr>
<td>G-5</td>
<td>Consider the existing permitted sources of construction aggregate and the regional demand for the resource within the needs of the proposed Plan and other infrastructure projects.</td>
<td>Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources</td>
</tr>
<tr>
<td>G-6</td>
<td>Existing areas containing high quality aggregate should be conserved for future extraction to ensure existing and future demand.</td>
<td>Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources</td>
</tr>
<tr>
<td>G-7</td>
<td>To solve construction aggregate shortage regional planning efforts must balance the planned need/demand for the resource with existing supplies.</td>
<td>Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources</td>
</tr>
<tr>
<td>G-8</td>
<td>Regional planning efforts should not eliminate future sources of aggregate by allowing development on these high quality lands (esp MRZ-2 lands).</td>
<td>Chapter 4.0, Section 4.7 Geology, Soils, and Mineral Resources</td>
</tr>
<tr>
<td>G-9</td>
<td>Please include an industry representative in the planning process.</td>
<td>This comment does not pertain to the environmental impacts of the proposed Plan, so it is not addressed in this EIR.</td>
</tr>
</tbody>
</table>

**Private Citizen – Jim Varnadore**

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>H-1</td>
<td>City of SD Council Policy 600-19 should be incorporated into the RTP/SCS as a meaningful policy to meet the requirement for equity in political government decisions.</td>
<td>The Policy of “Fostering of Balanced Community Development for the City of San Diego.“ is not related to a physical impact of the proposed Plan, and is therefore not addressed in this EIR.</td>
</tr>
<tr>
<td>H-2</td>
<td>Areas for human habitation / use (schools, play area, homes) should be separated from industrial or heavy commercial areas and from areas where pollution is heavy (freeways).</td>
<td>Chapter 4.0, Section 4.3, Air Quality, Section 4.11 Land Use, Section 4.13 Population and Housing</td>
</tr>
<tr>
<td>H-3</td>
<td>Noise levels in open recreation areas should be set at 68-72dBa (the City is currently changing its current threshold).</td>
<td>Chapter 4.0, Section 4.12 Noise and Vibration address California noise levels and land use compatibility guidelines, which are adopted or modified by each jurisdiction in their general plan and ordinance.</td>
</tr>
<tr>
<td>H-4</td>
<td>Recommendations about non-motorized transport should be solicited from community planning groups and SANDAG should not rely on advice of special interest groups.</td>
<td>This comment does not pertain to the environmental impacts of the proposed Plan, so it is not addressed in this EIR.</td>
</tr>
<tr>
<td>H-5</td>
<td>RTP/SCS should advocate for historic preservation.</td>
<td>Chapter 4.0, Section 4.5 Cultural and Paleontological Resources</td>
</tr>
<tr>
<td>H-6</td>
<td>RTP/SCS should require utility underground throughout the region. Utility connection boxes and transformers should also be underground in areas with visual assets which need preservation.</td>
<td>Chapter 4.0, Section 4.1 Aesthetics</td>
</tr>
</tbody>
</table>
## Move San Diego

<table>
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</thead>
<tbody>
<tr>
<td>I-1</td>
<td>SANDAG should take a fresh look at environmental impacts and not feel constrained by analysis of the preexisting plan.</td>
<td>This comment is noted; the EIR analyzes the significant environmental impacts of the proposed Plan, and does take a “fresh look” at these impacts.</td>
</tr>
<tr>
<td>I-2</td>
<td>Identify measures that will reduce GHG emissions and ensure consistency with AB32 and EO S-3-05. Measures that are already being implemented or measures that would be implemented regardless of the plan should not be counted.</td>
<td>Section 4.8 Greenhouse Gas Emissions includes additional potentially feasible mitigation measures not already included in the proposed Plan or otherwise required for further reducing GHG emissions to achieve a 2050 regional reference point based on EO S-3_05.</td>
</tr>
<tr>
<td>I-3</td>
<td>EIR must analyze conformity with SB 375 – EIR is opportunity to resolve any doubts that SANDAG is fully committed to SB 375 compliance.</td>
<td>Consistency with SB 375 is analyzed in Section 4.8 Greenhouse Gas Emissions.</td>
</tr>
<tr>
<td>I-4</td>
<td>EIR should minimize or eliminate deferral to local agencies of analysis or implementation of mitigation measures.</td>
<td>Chapter 4.0, Introduction. The EIR includes both regional mitigation measures that SANDAG can directly implement, and project-level second-tier mitigation measures to be applied to future second-tier projects, many of which would not be implemented by SANDAG.</td>
</tr>
<tr>
<td>I-5</td>
<td>Regional Plan will evaluate new land use scenarios to reduce long term GHG emissions; the EIR should carefully consider and disclose whether the regional plans assumptions are inconsistent with local agency regulations such as general plans and zoning ordinances.</td>
<td>Chapter 2.0 Project Description, Section 4.1 land use.</td>
</tr>
<tr>
<td>I-6</td>
<td>The EIR should disclose to SANDAG Board Members whether the regional plan can actually be implemented.</td>
<td>Under CEQA case law, EIRs may assume that a proposed project will be implemented as described.</td>
</tr>
<tr>
<td>I-7</td>
<td>EIR should provide additional in-depth analysis on planned and potential Smart Growth Opportunity Areas.</td>
<td>The EIR analyzes implementation of the proposed Plan, including the Sustainable Communities Strategy land use pattern which includes Smart Growth Opportunity Areas.</td>
</tr>
<tr>
<td>I-8</td>
<td>EIR should analyze to the extent projects increase Vehicle Miles Travelled, Air Quality, noise, and GHG.</td>
<td>Chapter 4.0, Section 4.15 Transportation, Section 4.3 AQ, Section 4.12 Noise, Section 4.8 GHG</td>
</tr>
<tr>
<td>I-9</td>
<td>EIR should consider indirect transportation impacts.</td>
<td>Chapter 4.0, Section 4.15 Transportation</td>
</tr>
<tr>
<td>I-10</td>
<td>Trip performance tables should be included in the EIR.</td>
<td>Chapter 4.0, Section 4.15 Transportation. See also proposed Plan, Appendix N.</td>
</tr>
<tr>
<td>I-11</td>
<td>For project and each alternative, indicate proportion of households that would be served by transit, proportion within a 30-minute walk, bike, transit, and vehicle commute from employment, and proportion within half-mile or 10-minute walk from transit.</td>
<td>Chapter 4.0, Section 4.15 Transportation and Chapter 6.0 Alternatives identify the transportation-related performance measures used in the EIR. See also proposed Plan, Appendix N.</td>
</tr>
<tr>
<td>I-12</td>
<td>EIR and technical analysis should use innovative transit models and tools that would accurately analyze environmental impacts.</td>
<td>See the response to comment E-1. See also proposed Plan, Appendix T.</td>
</tr>
<tr>
<td>I-13</td>
<td>EIR should analyze the effect of smart growth housing and active transportation on public health and childhood obesity.</td>
<td>Health impacts are analyzed in Section 4.3 Air Quality.</td>
</tr>
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</table>
### Appendix A: Notice of Preparation

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<tr>
<td>I-14</td>
<td>EIR should consider the work of CA Department of Public Health Epidemiologist Dr. Neal Maizlish.</td>
<td>Chapter 4.0, Section 4.3 Air Quality describes methodologies used for the EIR air quality impact analysis.</td>
</tr>
<tr>
<td>I-15</td>
<td>Provide the analysis to determine if the alternatives have made significant changes to communities already burdened with pollution. Disclose how the regional plan addresses air pollution impacts on communities impacted by air pollution.</td>
<td>A health risk analysis is included in Section 4.3. Alternatives are addressed in Chapter 6.0 Alternatives. CEQA does not require an Environmental Justice Analysis. Social equity issues are addressed in the proposed Plan. Also see proposed Plan Appendix H.</td>
</tr>
<tr>
<td>I-16</td>
<td>EIR should determine whether or not subpopulations may be particularly sensitive to increase in air pollution, and whether or not communities at their near capacity can bear additional pollution.</td>
<td>A health risk analysis is included in Section 4.3. CEQA does not require an Environmental Justice Analysis. Social equity issues are addressed in the proposed Plan. Also see Regional Plan Appendix H.</td>
</tr>
<tr>
<td>I-17</td>
<td>The alternatives identified in the NOP were exactly the same as those from the previous plan. This is a fresh opportunity for SANDAG to demonstrate commitment to sustainable region.</td>
<td>Chapter 6.0 Alternatives Analysis. The EIR includes additional alternatives beyond those described in the NOP.</td>
</tr>
<tr>
<td>I-18</td>
<td>Include an Unconstrained Revenue Alternative which would include the construction of all housing infrastructure projects without regard as to their economic feasibility. (For input on environmental impacts if funds were available for all desired projects, as a planning tool).</td>
<td>Chapter 6.0 Alternatives Analysis</td>
</tr>
</tbody>
</table>

### Native American Heritage Commission (NAHC)

<p>| J-1 | The NAHC advises a Sacred Lands File search of the NAHC. | Chapter 4.0, Section 4.5 Cultural and Paleontological Resources |
| J-2 | Careful planning with local tribes is advised. Early consultation will help avoid unanticipated discoveries. | Chapter 4.0, Section 4.5 Cultural and Paleontological Resources |
| J-3 | Urged to makes contact with the attached (to the NOP) list of Native American contacts to obtain their recommendations regarding the proposed project. | Chapter 4.0, Section 4.5 Cultural and Paleontological Resources |
| J-4 | Pursuant to PRC §5097.95 NAHC requests cooperation from other public agencies that NA consulting parties be provided pertinent project information, (including archaeological studies). | Chapter 4.0, Section 4.5 Cultural and Paleontological Resources |
| J-5 | The NAHC recommends avoidance as defined by CEQA §15370 (a) to pursuing a project that would damage or destroy cultural/archaeological resources. | Chapter 4.0, Section 4.5 Cultural and Paleontological Resources |
| J-6 | Consultation with tribes and interested Native American consulting parties should be conducted with the requirements of NEPA and Section 106 and 4(f) of NHPA, CEQ, as appropriate. | Chapter 4.0, Section 4.5 Cultural and Paleontological Resources. Please note that this EIR has been prepared to meet the requirements of CEQA, not NEPA. |
| J-7 | Confidentiality should be considered as protected by CA Government Code §6254(r) and may also be protected under Section 304 of NHPA or at Secretary of the Interior discretion if eligible for listing on NRHP. | Chapter 4.0, Section 4.5 Cultural and Paleontological Resources |</p>
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<tr>
<td>J-8</td>
<td>PRC Section 5097.98, CA Government Code §6254(r) and Health and Safety Code Section 7050.5 provide for provisions for an inadvertent discovery of human remains and mandate the process to be followed in the event of discovery other than in dedicated cemetery.</td>
<td>Chapter 4.0, Section 4.5 Cultural and Paleontological Resources</td>
</tr>
<tr>
<td>J-9</td>
<td>Consultation on specific projects must be the result of an ongoing relationship between tribes and lead agencies, and project proponents and their contractors. A relationship built around regular meetings and informal involvement with tribes will lead to more qualitative consultation tribe input on specific projects.</td>
<td>Chapter 4.0, Section 4.5 Cultural and Paleontological Resources</td>
</tr>
<tr>
<td>J-10</td>
<td>When cultural or burial sites are prevalent within project site, NAHC recommends avoidance of the site as referenced by CEQA Section 15370(a).</td>
<td>Chapter 4.0, Section 4.5 Cultural and Paleontological Resources</td>
</tr>
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</table>

**Unified Port of San Diego**

<p>| K-1 | District staff urges SANDAG to work closely with the district to gather information for preparation of the 2050 Plan and associated EIR. | Chapter 4.0, Section 4.11 Land Use; Section 4.14 Public Services and Utilities; Section 4.1 Aesthetics |
| K-2 | It is important for SANDAG staff to work collaboratively with District staff to accurately determine land and water use designations, transportation routes, recreational resources, and visual resources within the coastal zone in SD, National City, Chula Vista, Coronado, Imperial Beach&gt;. | Chapter 4.0, Section 4.11 Land Use; Section 4.14 Public Services and Utilities; Section 4.1 Aesthetics |
| K-3 | Necessary information related to maritime operations should be provided by District staff to ensure adequate and up to date information. | Chapter 2.0, Project Description, Chapter 5.0 Cumulative Analysis. |
| K-4 | District staff requests that the following sections be included in the EIR: aesthetics, agriculture and forestry, biological resources, geology and soils, GHG, hazards and hazardous materials, hydrology and water quality, land use and planning, minerals, noise, population and housing, public services, recreation, transportation and traffic, and utilities. | Chapter 4.0 Environmental Impact Analysis, Section 4.1 Aesthetics, Section 4.2 Agricultural Resources, Section 4.4 Biological Resources, Section 4.7 Geology, Soils, and Minerals, Section 4.8 GHG, Section 4.9 Hazards and Hazardous Materials, Section 4.10 Hydrology and Water Quality, Section 4.11 Land Use, Section 4.12 Noise, Section 4.13 Population and Housing, Section 4.14 Public Services and Utilities (recreation), and Section 4.15 Transportation. |
| K-5 | District staff requests that the EIR include a comprehensive analysis of the RTP. It is the expectation that the environmental analysis for District infrastructure and goods movement projects could potentially be tiered from the 2050 RTP EIR. | Goods movement is specifically discussed in the proposed Plan and in Chapter 2.0 Project Description, of the draft EIR. Chapter 4.0 discusses the approach analysis and methodology. |</p>
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<tr>
<td>SD 350.org</td>
<td>We see the need to address climate change in a strong and forceful manner in the 2050 Regional Plan, through both climate change mitigation and adaptation strategies. Climate change cannot be ignored in our regional planning efforts.</td>
<td>Chapter 4.0, Section 4.8 GHG and EIR Appendix F: Climate Change Impacts and Adaptation</td>
</tr>
<tr>
<td>L-1</td>
<td>Climate change needs to be seriously addressed by SANDAG in this Regional Plan.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0 Project Description</td>
</tr>
<tr>
<td>L-2</td>
<td>The methods used to draft the RTP should not be used again for the Regional Plan - real and comprehensive considerations for climate change and emissions reductions must be included.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Also, the past litigation mentioned in the comment concerned the adequacy of the EIR, not the adequacy of the 2011 RTP/SCS. Chapter 2.0 Project Description</td>
</tr>
<tr>
<td>L-3</td>
<td>GHG reductions should follow what is scientifically accepted and outlined in S-3-05: a reduction of GHG emissions to 80% below 1990 levels annually by 2050.</td>
<td>Chapter 4.0, Section 4.8 GHG</td>
</tr>
<tr>
<td>L-4</td>
<td>The Regional Plan should not be a plan of freeway expansion.</td>
<td>Chapter 2.0, Project Description. The proposed Plan has a heavy emphasis on transit, and active transportation.</td>
</tr>
<tr>
<td>L-5</td>
<td>SANDAG must implement policies that will reduce driving, increase energy conservation, and promote alternative transportation. The scenario displayed in Figure 1 should not occur in San Diego. *Note: Figure 1 is included in original comment letter and is included in Appendix A.</td>
<td>Chapter 2.0, Project Description Chapter 4.0, Section 4.8 GHG; Section 4.15 Transportation Chapter 6.0, Alternatives</td>
</tr>
<tr>
<td>L-6</td>
<td>SANDAG will have to assure compliance to evaluate a projects effect ‘on the physical environment.’ This needs to include a thorough analysis of the effects of climate change. SANDAG should use these legal requirements as proxies for evaluating significance under CEQA. Other agencies have determined these to be acceptable thresholds, and SANDAG should do the same.</td>
<td>Chapter 4.0, Section 4.8 GHG, and EIR Appendix F: Climate Change Impacts and Adaption.</td>
</tr>
<tr>
<td>L-7</td>
<td>Passage of a rigorous 2050 Regional Plan is very important because it is likely that additional regional plans will use the 2050 Regional Plan as a base model for land use and transportation emissions reductions.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0 Project Description and proposed Plan Appendix N</td>
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<tr>
<td>L-9</td>
<td>Smart growth policies should be implemented immediately to promote a sustainability which aligns with the San Diego lifestyle.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0, Project Description Chapter 4.0, Section 4.11 Land Use, and proposed Plan Appendix N</td>
</tr>
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</table>
| L-10| Specifically, we would like to see the following items included in the Regional Plan and implemented in our neighborhoods, which would both increase the livability of these areas and reduce greenhouse gas emissions:   
 a) Encourage infill or redevelopment, especially near transit centers, in existing city centers, and locate amenities nearby  
 b) Improve transit service for Trolley, Coaster, Sprinter, and develop more light rail and streetcars in urban areas  
 c) Provide transit to popular destinations such as Balboa Park, the beaches airport, universities  
 d) Preserve urban greenspaces, canyon linkages, limit developments around parks, encourage infill versus new development in suburban areas  
 e) Substantially increase bike lanes and facilities                                                                 | This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0, Project Description Chapter 4.0, Section 4.11 Land Use; Section 4.15 Transportation Chapter 6.0, Alternatives, and proposed Plan Appendix N |
| L-11| SANDAG should and must take responsibility for driving land use and transportation in the region, including mass transit.                                                                                         | This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0 Project Description and proposed Plan Appendix N                                                                 |
| L-12| As Mayor Filner declared in his state of the City address, “I will soon mandate that all municipal public buildings be equipped with solar power and urge all government agencies and businesses to do the same.” It is our hope that SANDAG will share in and encourage the Mayor’s vision. | This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan.                                                                 |
| L-13| Additional emissions reductions measures that should be included in the Regional Plan are:  
 a) Enact a public awareness campaign to encourage use of mass transit, energy conservation, and promote sustainable living in San Diego  
 b) Install solar panels where possible and feasible and cover parking                                                                 | This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0, Chapter 4.0, Section 4.6, Energy; Section 4.8 GHG, and proposed Plan Appendix N |
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<tr>
<td></td>
<td>lots with solar panels</td>
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<td></td>
<td>c) Should improve electric vehicle infrastructure, including installation of electric charging stations where appropriate</td>
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<td></td>
<td>d) Encourage alternative transportation through implementation of measures that discourage driving, such as increasing parking fees in urban areas and create preferred parking for electric vehicles</td>
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<td></td>
<td>e) Support policies and measures needed to implement a CCA</td>
<td></td>
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<tr>
<td>L-14</td>
<td>Approval of an Implementation and Monitoring Plan as part of the Regional Plan will be key to ensuring success of the GHG reductions measures, and compliance with statewide goals set by SB 375.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 5 of the proposed Plan describes plan implementation and monitoring. Section 4.8 GHG, and proposed Plan Appendix N</td>
</tr>
<tr>
<td>L-15</td>
<td>The Regional Plan should include a discussion of actions that will reduce emissions and their implementation dates. Certain items should be prioritized that either a) take longer to implement, or b) are important for guiding future development or regional planning</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0, Project Description Chapter 4.0, Section 4.8 GHG, and proposed Plan Appendix N</td>
</tr>
<tr>
<td>L-16</td>
<td>Measures to improve mass transit and increase smart growth need to be implemented in the near future (e.g. within the first five years of the plan), not until the end of the lifetime of the 2050 Regional Plan</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0, Project Description Chapter 6.0 Alternatives Analysis, and proposed Plan Appendix N</td>
</tr>
<tr>
<td>L-17</td>
<td>Implementation and success of these strategies should be trackable and enforceable.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 5 of the proposed Plan describes plan implementation and monitoring. EIR mitigation measure monitoring will be addressed in the EIR Mitigation Monitoring and Reporting Program. Appendix N of proposed Plan</td>
</tr>
<tr>
<td>L-18</td>
<td>The Regional Plan should not rely on voluntary strategies or federal or state actions to reduce greenhouse gas emissions. Concrete, feasible goals need to be coherently outlined, along with funding mechanisms.</td>
<td>Chapter 2.0, Project Description Chapter 4.0, Section 4.8 GHG, and proposed Plan Appendix F.</td>
</tr>
<tr>
<td>L-19</td>
<td>Adaptation to climate change will need to be considered in the 2050 Regional Plan.</td>
<td>EIR Appendix F Climate Change Impacts and Adaptation</td>
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<td>L-20</td>
<td>This will include consideration of climate change impacts in planning efforts, such as rising tide and increasing wildfires.</td>
<td>Section 4.9 Hazards (Wildland Fires), Section 4.10 Hydrology and Water Quality</td>
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<td>EIR Appendix F: Climate Change Impacts and Adaptation</td>
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<tr>
<td>L-21</td>
<td>It will also be critical for adaptation strategies to be identified for target public groups identified in the Public Involvement Plan, including minorities, disabled persons, the elderly.</td>
<td>EIR Appendix F: Climate Change Impacts and Adaptation</td>
</tr>
<tr>
<td>L-22</td>
<td>Specific identification of adaptation measures that address these groups is needed.</td>
<td>EIR Appendix F: Climate Change Impacts and Adaptation</td>
</tr>
<tr>
<td>L-23</td>
<td>Adaptation should also include measures to conserve open space areas, particularly in urban areas.</td>
<td>EIR Appendix F: Climate Change Impacts and Adaptation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Metrolink</td>
</tr>
<tr>
<td>M-1</td>
<td>Station enhancements to provide better transfers between Coaster, Metrolink, and Sprinter at the Oceanside Station.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0, Project Description</td>
</tr>
<tr>
<td>M-2</td>
<td>Flexibility and improvements to the train schedules to provide better connectivity to all modes of transportation in and out of Oceanside Station providing better opportunities for passengers to move between San Diego and points north.</td>
<td>This comment does not directly address the scope of the EIR, but rather the contents of the proposed Plan. SANDAG will consider this type of NOP comment as it formulates the proposed Plan. Chapter 2.0, Project Description</td>
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<td></td>
<td></td>
<td>City of San Marcos - Susan Vandrew Rodriguez, Associate Planner</td>
</tr>
<tr>
<td>N-1</td>
<td>The City is requesting an opportunity to provide comments to the Regional Plan and related environmental impact issues during preparation of the EIR in advance of the document being released for public review.</td>
<td>As described in Section 1.5, consistent with CEQA, SANDAG contacted affected agencies, organizations, and individuals who may have an interest in the proposed Plan and EIR. This consultation assisted in defining the scope of this EIR as described in Section 1.2 of the draft EIR. Agencies, organizations, and individuals are invited to provide written comments on the Draft EIR during the public review period.</td>
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Appendix A-1

Notice of Preparation of a Program Environmental Impact Report for SANDAG 2050 Regional Plan
December 14, 2012

TO: Interested Agencies, Organizations, and Individuals

FROM: SANDAG Staff

SUBJECT: Notice of Preparation of a Programmatic Environmental Impact Report for the 2050 Regional Plan

Notice of Preparation

The San Diego Association of Governments (SANDAG), as lead agency, will prepare a Program Environmental Impact Report (EIR) for the 2050 Regional Plan in accordance with the California Environmental Quality Act (CEQA). Pursuant to CEQA Section 21080.4(a) and Section 15082 of the State CEQA Guidelines, responsible and trustee agencies and members of the public are asked to provide written comments regarding the scope and content of the Programmatic EIR; therefore, SANDAG is interested in the views of members of the public as to the scope and content of the environmental information in the draft EIR. The preliminary project description, location, and probable environmental effects are contained in the attached material. An initial study was not prepared for this project.

Scoping Meeting

A public scoping meeting will be held on Thursday, January 10, 2013, at 12 noon (immediately preceding the Regional Planning Technical Working Group meeting). The meeting will be held at SANDAG, 401 B Street, Suite 800, San Diego, California 92101.

Public input will be taken at this meeting. In addition, public input can be provided in writing at the meeting or can be submitted to SANDAG. Contact information is provided below.

Time limits mandated by state law require that responsible agencies and trustee agencies provide comments no later than 30 days after receipt of this notice. However, SANDAG is providing a 60-day comment period to public agencies, interested organizations, and members of the public. As such, your response must be sent at the earliest possible date, but no later than February 15, 2013.
SANDAG Contact Information

Please send your response to:

Rob Rundle, Principal Regional Planner
401 B Street, Suite 800
San Diego, CA 92101
E-mail: Rob.Rundle@sandag.org
Phone: (619) 699-6949
Fax: (619) 699-1905

Please include your name and contact information or the name of a contact person in your organization or agency, if appropriate.

Lead Agency: San Diego Association of Governments (SANDAG)

Project Title: Programmatic Environmental Impact Report for the 2050 Regional Plan

Project Location: All 18 municipalities and the unincorporated areas within the County of San Diego

Date: December 14, 2012

RRU/dsn

Attachment: Project Information and Scope of Environmental Analysis

Prepared By:

[Signature]

Rob Rundle, Principal Regional Planner
Notice of Preparation – Programmatic Environmental Impact Report
Project Information and Scope of Environmental Analysis
2050 Regional Plan
December 14, 2012

Background and Project Overview

The San Diego Association of Governments (SANDAG) is the lead agency under the California Environmental Quality Act (CEQA) and will prepare a Programmatic Environmental Impact Report (EIR) for the 2050 Regional Plan. The EIR will be prepared pursuant to the CEQA. The 2050 Regional Plan will include the merging of the Regional Transportation Plan (RTP), the Sustainable Communities Strategy (SCS), and the Regional Comprehensive Plan (RCP) in order to provide an easily accessible document that includes an overall vision for the San Diego region.

The regional plan will address the region's housing, economic, environmental, transportation, and other related needs in the context of long-term sustainability.

SANDAG will start the planning process for the regional plan by establishing a framework of goals, policy objectives, and performance measures to guide development. This is a key first step, as it is the policy foundation for the regional plan and identifies the “big picture” of what the region can achieve.

Project Location

The regional plan focuses on both the land use and growth, and the movement of people and goods within the San Diego region. The regional plan also considers crossborder and interregional travel patterns with neighboring counties and Mexico. The geographic extent of the 2050 Regional Plan includes the Cities of Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, El Cajon, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and the unincorporated County of San Diego.

Senate Bill 375

Pursuant to Senate Bill 375 (Steinberg, 2008) (SB 375), the SCS will be designed to achieve, to the extent feasible, regional greenhouse gas (GHG) emission targets, that will be established by the California Air Resources Board (CARB), through development patterns, infrastructure investments, and transportation measures or policies. Additionally, the SCS will identify areas sufficient to address the region's future housing needs and address protection of sensitive resource areas. If the SCS is unable to achieve the GHG emission targets, an Alternative Planning Strategy (APS) must be developed to demonstrate how the targets could be achieved.

The regional plan environmental analysis will include GHG emissions baseline measurements and projections, as well as potential mitigation measures to reduce those emissions.
In accordance with state and federal guidelines, the RTP component of the regional plan is updated every four years. The region’s first RTP to be produced under SB 375 was adopted by the SANDAG Board in 2011. As such, the most recent comprehensive EIR on the RTP was conducted in 2011 for the 2050 RTP and its SCS. A new EIR for the regional plan is necessary to adequately evaluate potentially significant environmental effects of the regional plan and to indicate the manner in which such significant effects can be reduced, avoided, and/or mitigated. The regional plan is scheduled for adoption by the Board of Directors in summer of 2015.

This Notice of Preparation (NOP) is intended to alert regulatory and trustee agencies, interested agencies, organizations, and individuals of the preparation of the regional plan EIR. Comments regarding the scope of the EIR received during the 60-day NOP review period will be incorporated, as appropriate, in the environmental document.

**Issues Addressed in the Environmental Impact Report**

The EIR will analyze the impacts of the regional plan on the physical environment. The EIR will address the regional plan’s potential impacts to the following environmental resource areas:

1. Agricultural and Forest Resources
2. Air Quality and Health Risks
3. Biological Resources
4. Cultural Resources
5. Energy
6. Geology and Soils/Mineral Resources
7. Greenhouse Gas Emissions
8. Hazardous Materials
9. Hydrology/Water Quality
10. Land Use/Population and Housing
11. Noise
12. Public Services/Utilities
13. Recreation
14. Regional Water Supply
15. Socioeconomics/Environmental Justice
16. Transportation
17. Visual Resources

In addition, the EIR will address cumulative impacts, growth-inducing impacts, and other issues required by CEQA.

**Alternatives Analyzed in the Environmental Impact Report**

SANDAG will evaluate several alternatives to the project in the EIR. Each alternative will be compared to the proposed project for its potential to achieve the goals of the regional plan, while reducing significant environmental impacts. In addition to the project, which will assume a land use base adapted from the region’s general plans and a transportation
network and transportation policies that are developed from a revenue-constrained funding scenario, the following alternatives also will be evaluated.

1. No Project Alternative – The No Project Alternative is required by CEQA. For this EIR, the No Project Alternative is defined as a land use base comprised of existing land use plans and a transportation network comprised of committed transportation projects.

2. Intensified Land Use Distribution Alternative – The Intensified Land Use Distribution Alternative will analyze a land use pattern that further concentrates the same forecasted population and employment growth along existing and planned transportation corridors. The transportation network would be modified to accommodate this projected concentration of future growth.

3. Modified Transit Network Alternative – The Modified Transit Network Alternative will evaluate additional transit investments and/or transit system improvements that would further implement the region’s goals.

Although these alternatives have been preliminarily identified, SANDAG is seeking input on the alternatives during the NOP process that could result in modifications to the number of alternatives analyzed in the EIR, or modifications to the alternatives identified above. In addition, the EIR will identify other alternatives that were initially considered, but rejected for reasons including infeasibility or inability for a particular alternative to meet the project objectives or reduce significant environmental impacts of the project.
Appendix A-2

Notice of Preparation Comment Letters
February 15, 2013

Mr. Rob Rundle
San Diego Association of Governments
410 B Street, Suite 800
San Diego, California 92101

Subject: Comments on the Notice of Preparation for the Program Environmental Impact Report for the 2050 Regional Transportation Plan/Sustainable Communities Strategy, San Diego County, California, SCH No. 2010041061

Dear Mr. Rundle:

The California Department of Fish and Wildlife (Department) has reviewed the above referenced Notice of Preparation (NOP) for the Program Environmental Impact Report (PEIR) for the 2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), dated December 14, 2012. The Department previously commented on the NOP for the PEIR (letter dated May 17, 2010) and a draft PEIR for the 2050 RTP/SCS, dated June 2011. The comments provided herein are based on the information provided in the 2050 NOP (dated December 14, 2012), our knowledge of sensitive and declining vegetation communities, and our participation in regional conservation planning efforts.

The following statements and comments have been prepared pursuant to the Department’s authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code §2050 et seq.) and Fish and Game Code Section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program. The 2050 RTP/SCS is located within planning areas for a number of NCCP plans within San Diego County, including the Multiple Species Conservation Program (MSCP) and Multiple Habitat Conservation Program (MHCP).

The 2050 RTP/SCS is the blueprint for a regional transportation system that further enhances quality of life, promotes sustainability, and offers more mobility options for people and goods. The 2050 RTP/SCS envisions environmentally sustainable communities that are more conducive to walking and bicycling. There would be more access to public transit in areas such as Chula Vista, downtown San Diego, Kearny Mesa, Mission Valley, University Town Center, Sorrento Mesa, and Mira Mesa. Additionally, the Trolley or SPRINTER could be used to attend universities or the new SPRINTER Express could be used to commute between Oceanside and Escondido. Carpoolers, high-tech buses, and solo drivers who pay a fee could share new express lanes on our major freeways. Building on the current transportation system with funding anticipated over the next 40 years, the 2050 RTP/SCS outlines projects for transit, rail and bus services, express or managed lanes, highways, local streets, bicycling, and walking. The result would be an integrated, multimodal transportation system by mid-century. Proposed projects and suggested project start dates may be found in Tables 6.1 and 6.2, and pages 6-4 and 6-16, respectively, of the NOP for the 2050 RTP/SCS.
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 2050 RTP/SCS 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/Habitat Conservation Plans (HCP) efforts are not undermined. We believe the 2050 RTP/SCS provides a unique opportunity to develop and refine the San Diego Association of Governments (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 (County) and City of San Diego’s approved MSCP) and the in-process North County MSCP. 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.

The Department offers the following comments and recommendations to assist SANDAG in avoiding or minimizing potential project impacts on biological resources.

Specific Comment:

In the final PEIR (October 2011) for the 2050 RTP/SCS, the State Route 241 toll road from Interstate 5 to Orange County is mentioned in tables A.1, A.2, A.3, A.4, A.9, A.11, 5.1, 6.3, and 6.4, and briefly mentioned in text on pages B-7, 5-4. However, the proposed road alignment is not identified on any of the regional maps in the 2050 RTP/SCS. The Department continues to have concerns about this road segment based on habitat fragmentation of the last intact watershed in San Diego County and other sensitive species impacts, including Pacific pocket mouse (Perognathus longimembris) and arroyo toad (Bufo californicus). Therefore, please include proposed road alignments or maps, if known, and a description of past significant concerns to this roadway in the draft update to the 2050 RTP/SCS PEIR.

General Comments:

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be “no net loss” of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the
Program Environmental Impact Report (PEIR) and must compensate for the loss of function and value of a wildlife corridor.

a) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the PEIR. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by the Department. Please note that some wetland and riparian habitats subject to the Department’s authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

b) The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or “entity”) must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department’s issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction’s (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

2. The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subs. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the

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2 A notification package for a LSA may be obtained by accessing the Department’s web site at www.wildlife.ca.gov/habcon/1600.
Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend the following information be included in the PEIR.

   a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

   b) A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

**Biological Resources within the Project's Area of Potential Effect**

4. The NOP generally characterizes the surrounding land use. Subsequent documents should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. The PEIR should include the following information.

   a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.

   b) A thorough assessment of rare plants and rare natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see: http://www.wildlife.ca.gov/habcon/plant/) (hard copy available on request).

   c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 322-2493 or www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

   d) An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures
should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the PEIR.

a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the PEIR.

c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The PEIR should include measures to fully avoid and otherwise protect Rare Natural Communities (Attachment) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

7. The PEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

8. For proposed preservation and/or restoration, the PEIR should include measures to
perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. In order to avoid impacts to nesting birds, the PEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer shall be a minimum width of 300 feet (500 feet for raptors), shall be delineated by temporary fencing, and shall remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project.

10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the NOP for this project and to assist SANDAG in further minimizing and mitigation project impacts to biological resources. If you have questions or comments regarding this letter, please contact Bryand Duke at (858) 637-5511, Bryand.Duke@Wildlife.ca.gov or Tim Dillingham at (858)467-4250, Tim.Dillingham@Wildlife.ca.gov

Sincerely,

Marilyn Fluhart
Acting Environmental Program Manager
South Coast Region
Enclosure
  Sensitivity of Top Priority Rare Natural Communities in Southern California

c: State Clearinghouse, Sacramento
Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.
S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

<table>
<thead>
<tr>
<th>Rank</th>
<th>Community Name</th>
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<tbody>
<tr>
<td>S1.1</td>
<td>Mojave Riparian Forest</td>
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<td></td>
<td>Sonoran Cottonwood Willow Riparian</td>
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<td></td>
<td>Mesquite Bosque</td>
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<td></td>
<td>Elephant Tree Woodland</td>
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<td></td>
<td>Crucifixon Thorn Woodland</td>
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<td>Althorn Woodland</td>
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<td>Arizonian Woodland</td>
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<td></td>
<td>Southern California Walnut Forest</td>
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<td>Mainland Cherry Forest</td>
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<td>Southern Bishop Pine Forest</td>
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<td>Torrey Pine Forest</td>
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<td>Desert Mountain White Fir Forest</td>
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<td>Southern Dune Scrub</td>
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<td></td>
<td>Southern Coastal Bluff Scrub</td>
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<td></td>
<td>Maritime Succulent Scrub</td>
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<tr>
<td></td>
<td>Riversidean Alluvial Fan Sage Scrub</td>
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<tr>
<td></td>
<td>Southern Maritime Chaparral</td>
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<td></td>
<td>Valley Needlegrass Grassland</td>
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<td></td>
<td>Great Basin Grassland</td>
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<td></td>
<td>Mojave Desert Grassland</td>
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<td>Pebble Plains</td>
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<tr>
<td></td>
<td>Southern Sedge Bog</td>
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<td></td>
<td>Cismontane Alkali Marsh</td>
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<td>S1.2</td>
<td>Southern Foredunes</td>
</tr>
<tr>
<td></td>
<td>Mono Pumice Flat</td>
</tr>
<tr>
<td></td>
<td>Southern Interior Basalt Flow Vernal Pool</td>
</tr>
</tbody>
</table>
S2.1

Venturan Coastal Sage Scrub
Diegan Coastal Sage Scrub
Riversidean Upland Coastal Sage Scrub
Riversidean Desert Sage Scrub
Sagebrush Steppe
Desert Sink Scrub
Mafic Southern Mixed Chaparral
San Diego Mesa Hardpan Vernal Pool
San Diego Mesa Claypan Vernal Pool
Alkali Meadow
Southern Coastal Salt Marsh
Coastal Brackish Marsh
Transmontane Alkali Marsh
Coastal and Valley Freshwater Marsh
Southern Arroyo Willow Riparian Forest
Southern Willow Scrub
Modoc-Great Basin Cottonwood Willow Riparian
Modoc-Great Basin Riparian Scrub
Mojave Desert Wash Scrub
Engelmann Oak Woodland
Open Engelmann Oak Woodland
Closed Engelmann Oak Woodland
Island Oak Woodland
California Walnut Woodland
Island Ironwood Forest
Island Cherry Forest
Southern Interior Cypress Forest
Bigcone Spruce-Canyon Oak Forest

S2.2

Active Coastal Dunes
Active Desert Dunes
Stabilized and Partially Stabilized Desert Dunes
Stabilized and Partially Stabilized Desert Sandfield
Mojave Mixed Steppe
Transmontane Freshwater Marsh
Coulter Pine Forest
Southern California Fellfield
White Mountains Fellfield

S2.3

Bristlecone Pine Forest
Limber Pine Forest
February 14, 2013

Rob Rundle, Principal Regional Planner
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

RE: Programmatic Environmental Impact Report for the 2050 Regional Plan
SCH# 2010041061

Dear Mr. Rundle,

Thank you for the opportunity to comment on the Notice of Preparation for the 2050 Regional Transportation Plan/Sustainable Communities Strategies Programmatic EIR draft Environmental Impact Report. California State Parks (CSP) is responsible for a large percentage of the land in San Diego County (County). We are pleased to be a part of envisioning a future in which quality recreation will be accessible by hiking/biking trails and public transportation, while natural and cultural resources of the public lands are protected.

Rail and road projects will increase noise and vibration in park lands. Additional traffic and hardscape, combined with the removal of landscaping, may significantly increase noise in areas important to wildlife. Habitat loss must be avoided and connectivity between core areas preserved. Noise and vibration will also impact the serenity of cultural areas, as in Old Town State Historic Park.

Viewsheds are a key amenity of both natural and cultural landscapes. Future development projects may contribute to a cumulative significant impact on important public viewsheds like from the Torrey Pines Lodge, the plaza in Old Town San Diego and natural areas like Torrey Pines State Natural Reserve.

CSP is concerned with hydrological changes in the vicinity of wetlands. Impermeable surfaces reduce infiltration rates and increase the volume and velocity of fresh water down stream. This additional fresh water flow can displace salt water and dramatically reduce rare salt water-dependent habitats. Project design guidelines or mitigation measures must be implemented to reduce the amount of sediment and freshwater flows to downstream estuarine systems; such techniques include the use of open-graded concrete and other permeable surface treatments. There are a number of projects within San Diego Coast District State Parks that could be incorporated in to regional restoration or mitigation programs. State Parks is enthusiastic about partnering with SANDAG to support improvement of our watersheds and coastal estuarine systems.

CSP would like the plan to consider the local and regional implications of habitat restoration and mitigation efforts. For example, the plan should recognize that loss of functions and values in a particular watershed may not be replaceable in another watershed. A regional approach to mitigation must only be considered after full analysis of mitigation opportunities and constraints within the immediate watershed for each element of the plan.
Transportation corridors support invasive plant species and provide pathways for their movement between important biological reserves. Disturbance and movement of equipment and materials will exacerbate the problem. CSP and other local reserve management entities currently expend great effort controlling many of the species found in the County. This effort is currently unsustainable as long as there are unmanaged invasive plant populations adjacent to biological open space. An integrated invasive plant control plan should be designed and implemented on a regional scale to adequately address this problem. Potential solutions may include creating management zones that would either provide barriers to invasive plant spread (for example hardscape or high productivity plantings) from reserve to reserve or provide more effective maintenance of native habitat areas with dedicated funding to reduce or eliminate invasive plant populations. Included within this plan would be enforceable protocols for maintenance, construction, and emergency activities to follow when working within and moving between important habitat areas.

CSP appreciates being involved in the decision-making process. We look forward to working with SANDAG to further develop strategies that accomplish the needs for improved transportation and recreation without reducing the quality or sustainability of our lands.

The current South Carlsbad land swap between the City of Carlsbad and CSP is an example of an excellent improvement of a transportation corridor that also enhances public access and enjoyment of the beach. The project may need supplemental funding and would benefit from being included within the framework of the 2050 Regional Plan.

Please feel free to contact staff Environmental Scientist Darren Smith (619-952-3895) for further discussion of our concerns about the plan, and potential partnership opportunities.

Sincerely,

Clayton A. Phillips, San Diego Coast District Superintendent

Cc:
Richard Dennison, South Sector Superintendent
Chris Peregrin, Acting Reserve Manager Tijuana National Estuarine Research Reserve
Robin Greene, North Sector Superintendent
Darren Smith, Acting District Services Manager
Reading File
February 15, 2013

Rob Rundle, Principal Regional Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

VIA EMAIL TO: Rob.Rundle@sandag.org

Subject: CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF PREPARATION OF A PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT FOR THE 2050 REGIONAL PLAN

The City of San Diego ("City") has received and reviewed the Notice of Preparation ("NOP") for the Programmatic Environmental Impact Report (EIR) for the 2050 Regional Plan Project and appreciates this opportunity to provide comments to the SANDAG. In response to the NOP, the City has identified potential issues that may result in a significant impact to the environment. Continued coordinated planning between the City, SANDAG, and other local, regional, state, and federal agencies will be essential.

Staff from the Development Services Departments have the following comments regarding the content of the NOP:

Development Services Department, Transportation Development Section: Ann Gonsalves, PE (619) 446-5294

We have reviewed the Notice of Preparation- Programmatic Environmental Impact Report for the 2050 Regional Plan, and have the following comments:

1. The transportation impact analysis prepared for the Programmatic Environmental Impact Report should follow the guidelines of the City of San Diego Traffic Impact Study Manual, for all roadway facilities within the City of San Diego evaluated.

2. The transportation impact analysis prepared for the Programmatic EIR should apply the City of San Diego Significance Determination Thresholds, for all roadway facilities within the City of San Diego evaluated.
3. The transportation impact analysis for the Programmatic EIR should evaluate the San Ysidro/Otay Mesa border transportation system and include efforts to improve access to border crossings for transit passengers, pedestrians, and vehicles.

4. The transportation impact analysis for the Programmatic EIR should evaluate regional truck facilities to minimize impacts on local streets and arterials.

5. The transportation impact analysis for the Programmatic EIR should evaluate policies to improve bicycling and to recommend a system of safe, convenient, regionally significant bicycle facilities.

6. The transportation impact analysis should evaluate the provision of regional freeway-to-freeway connectors to minimize impact of regional trips on local street networks.

7. The transportation impact analysis prepared for the Programmatic EIR should discuss and evaluate any loss of on-street parking, its effects on the supply of on-street residential parking, and whether the loss of parking would severely impede the accessibility of a public facility.

8. The environmental document should include alternatives that avoid or lessen expected transportation impacts, including at least one alternative that would avoid significant impacts to the City of San Diego’s streets and transit systems.

**Development Services Department, Environmental Analysis Section, Martha Blake, (619) 446-5375**

1. The environmental document should consider the City of San Diego’s Significance Determination Thresholds and General Plan Policies when evaluating potential impacts to resources within the City of San Diego boundaries. Appropriate mitigation should be proposed consistent with all applicable City of San Diego Guidelines (including but not limited to Biology, Acoustical, and Historical). Staff from EAS would be happy to provide copies of any documents or links to the City website where those documents can be located.

Please contact the appropriate above-named individual(s) if you have any questions on the submitted comments. The City respectfully requests that you please address the above comments in the EIR.

Sincerely,

[Signature]

Martha Blake
Senior Planner
Development Services Department

cc: Ann French Gonsalves, Senior Traffic Engineer, Development Services Department
In response to your request for comment on the Programmatic Environmental Impact Report for the 2050 Regional Plan our group has several areas of concern within the Descanso Planning Group area. These concerns fall into several categories of the issues addressed in the list on page 4 of the document you sent our group.

Our areas of concern include:
1. Improving transportation and safety by improving the Camp Oliver bridge on Riverside Drive. The bridge is very narrow and large vehicles cannot pass one another safely. It needs a pedestrian walkway added because if vehicles and pedestrians are on this narrow bridge at the same time the pedestrian has no place to go.
2. Improving recreation with a safe walking pathway around Descanso. Presently pedestrians must walk in the road much of the time in areas where vehicles are traveling 35-55 miles per hour.
3. Further improving recreation by continuing to improve the facilities at the Descanso Elementary joint use facility which serves as the community's only park.
4. Improving public service and utilities by increasing cell phone coverage and internet access in our area. It is currently very limited especially cell service in the valley areas. This becomes a serious safety issue especially when the power is out and regular phone service is not available for emergencies.
5. We are very concerned about the areas of regional water supply and hydrology/water quality. We are a groundwater dependent community. Our water comes from wells even if we are connected to the water district. The quantity and quality of water have been major concerns in our area. In times of drought many wells in our community have gone dry. Water quality in many areas, while safe to drink, leaves much to be desired.

Thank you for giving the Descanso Planning Group an opportunity for input. If you have any questions or want clarification please contact Claudia White through email Wamma43@yahoo.com.
February 15, 2013

Via Electronic Mail

Rob Rundle
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Re: Notice of Preparation of a Programmatic Environmental Impact Report for the 2050 Regional Plan

We would like to thank SANDAG for the opportunity they have provided to comment on the Scope and Content of the Programmatic Environmental Impact Report. Please consider the following comments when analyzing the new 2050 EIR.

- Modeling Assumptions: The Regional Plan will fail unless (a) all modeling assumptions are disclosed publicly early in the process; and (b) all such assumptions are based upon substantial evidence that is also disclosed to the public early in the process.

- Alternatives: The EIR should contain an alternative considering the implications of a full integration of land use and transportation planning. While SANDAG has historically considered land use the exclusive purview of its member agencies, it is quite clear that these cannot exist as “chicken and egg” or “horse and cart.” Rather, policies and goals need to be established whereby public transit and other non-automobile based modes work in tandem with land use development policies (density, zoning, and infrastructure) that will result in success – defined as livable, sustainable communities.

  - Alternatives should stem from a baseline of density placed where density exists, and transit is/will be planned. New growth in the region should be contemplated solely within true urban centers, and not pursuant to a nearly arbitrary “smart growth map.”
The Urban Area Transit Strategy produced to comply with our earlier CNFF v. SANDAG settlement must be given further consideration beyond its treatment in the RTP 2050 process.

- Specifically, certain areas have already been identified that could achieve much higher transit mode share. Alternatives should be developed to take advantage of such areas, where land is already designated with high density mixed-use zoning.

- Project Description: The project description and purpose should be clarified to include reduction of emissions of greenhouse gases to sustainable levels as determined by AB32 and S-3-05.

The importance of the content in this EIR cannot be overstated. The current EIR, for example, is under a legal cloud for having failed to achieve the standards set forth by the state of California. The essence of this failure was a land use transportation plan that in effect increased emissions over the life of the plan. At CNFF we hope that the forthcoming EIR will address and solve these concerns.

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1 https://docs.google.com/file/d/0BxdvAym6vsI7bHlqRnhGUKd0NGc/edit
2 http://www.transitsandiego.org/transitsandiego/images/total_emission_graph.jpg
February 15, 2013

Rob Rundle
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Via email to rob.rundle@sandag.org

COMMENTS ON THE NOTICE OF PREPARATION OF A PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT FOR THE 2050 REGIONAL PLAN

Dear Mr. Rundle:

The County of San Diego (County) has received and reviewed the Notice of Preparation (NOP) of a Programmatic Environmental Impact Report (PEIR) for the 2050 Regional Plan dated December 14, 2012. The County appreciates SANDAG’s efforts to merge the Regional Transportation Plan, the Sustainable Communities Strategy, and the Regional Comprehensive Plan in order to provide an easily accessible document that includes an overall vision for the San Diego region.

The NOP indicates that the PEIR will analyze potential impacts associated with 17 environmental topics, as well as potential cumulative and growth-inducing impacts. In addition, at least two alternative Plans will be evaluated in the PEIR. The PEIR should take into consideration the County’s recently updated General Plan and Mobility Element. When the 2050 Regional Plan addresses the transportation needs of the region, the County’s Mobility Element should be used as a primary resource in determining the needs of the unincorporated area.
Mr. Rundle  
February 15, 2013  
Page 2 of 2  

The County appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request.

Sincerely,

[Signature]

JEFF MURPHY, Chief  
Planning & Development Services

e-mail cc:

Megan Jones, Group Program Manager, LUEG  
Julia Quinn, Environmental Planning Manager, Department of Public Works  
Richard Chin, Associate Transportation Specialist, Department of Public Works  
LeAnn Carmichael, Group Program Manager, Department of Public Works  
Mindy Fogg, Land Use Environmental Planner, Planning & Development Services
February 13, 2013

Rob Rundle, Principal Regional Planner
401 B Street, Suite 800
San Diego, CA, 92101

RE: Comments for the Programmatic Environmental Impact Report for the 2050 Regional Plan

Dear Mr. Rundle:

EnviroMINE, Inc., a San Diego based company that specializes in providing services to the construction aggregates industry would like to provide the following comments on the proposed 2050 Regional Plan. It is our understanding that the Regional Transportation Plan, Sustainable Communities Strategy and Regional Comprehensive Plan will be combined into one document and will be referred to as the Regional Plan.

It has been well documented by SANDAG and the California Department of Conservation that San Diego County is experiencing a shortage of permitted construction aggregate resources. Local producers are unable to satisfy demand, resulting in materials being imported from surrounding counties. The shortage has caused increased truck traffic, higher prices for construction materials, increased greenhouse gas emissions and other environmental impacts that could be avoided if materials were permitted locally.

EnviroMINE would like to emphasize the importance of including construction aggregate resources in regional planning efforts. Construction aggregate is the sand, gravel and crushed rock used in all infrastructure projects. To minimize the transportation costs and environmental impacts from transporting the material, it is essential that aggregate resources are located and permitted near the area of consumption. The benefits of local supplies was well documented in SANDAG’s January 2011 report the "San Diego Region Aggregate Supply Study." (SANDAG Aggregate Study) In this document, it clearly measured the significant reductions in green house gases (Figure 4-3, page4-13) from permitting local sources. Information from this report should be considered when developing the Regional Plan.

Regional planning efforts should consider the location of high quality aggregate resources as well as the long term demand for these materials. By considering both, the County can move closer to permitting enough reserves to satisfy demand and avoid long distance imports. Senate Bill 375 requires that construction aggregate resources be considered within the Sustainable Communities Strategy:
SEC. 4. Section 65080 (b)(2) (B) Each metropolitan planning organization shall prepare a sustainable communities strategy,...The sustainable communities strategy shall (a) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivision (a) and (b) of Section 65080.01

SEC. 5. Section 65080.01 (a) "Resource areas include...(4)...areas of the state designated by the State Mining and Geology Board as areas of statewide or regional significance...

Areas of statewide or regional significance are referred to as Mineral Resource Zone 2 (MRZ2) and were discussed in the SANDAG Aggregate Study on pages 2-9, 2-10 and were mapped on page 2-11. (Attached)

EnviroMINE is asking SANDAG to consider the existing permitted sources of construction aggregate, and the regional demand for the resource within the needs of the proposed Regional Transportation Plan and other infrastructure projects. In addition, the existing areas containing high quality aggregate resources should be conserved for future extraction to ensure existing and future demand for the resource is satisfied by local sources. To solve the construction aggregate shortage, regional planning efforts must balance the planned need/demand for the resource with existing supplies. Regional planning efforts should not eliminate future sources of aggregate by allowing development on these high quality resources (Specifically on MRZ2 lands).

In additional to considering the location and source of construction aggregate materials, we encourage SANDAG to include an industry representative in the planning process. Construction aggregate production is a key industry for implementing the Regional Plan and we would like to be involved in the planning process. Please contact Crystal Howard with EnviroMINE for future correspondence @ 619-284-8515 or email: crystal@enviroMINEinc.com.

Thank you for considering our comments. We look forward to working with you.

Sincerely,
EnviroMINE, Inc.

[Signature]
Crystal Howard

Attachments
An invaluable building resource for: Homes
Schools
Hospitals
Reservoirs
Office buildings
Commercial centers
Freeways
Railways
You name it
SMARA Section 2762(a) states:

"Within 12 months of receiving mineral information, and also within 12 months of designation of an area of statewide or regional significance within its jurisdiction, every lead agency shall, in accordance with state policy, establish mineral resource management policies, to be incorporated in its general plan." \(^{13}\)

In order to protect the future supply of aggregate: (1) lands containing construction aggregate quality resources need to be identified by the California Geological Survey and the State Mining and Geology Board; and (2) the lead agency, through its mineral resource management policies in its general plan, needs to manage the land uses within and surrounding areas of statewide and regional significance to restrict the encroachment of incompatible land uses.

**MINERAL LAND CLASSIFICATION**

SMARA requires the state geologist to classify lands based on the known or inferred mineral resource potential of that land. Lands are classified on the basis solely of geologic factors and without regard to existing land use and ownership, as one of the following:

- Areas containing little or no mineral deposits
- Areas containing significant mineral deposits
- Areas containing mineral deposits, the significance of which requires further evaluation

The State Mining and Geology Board subsequently defined these categories into mineral resource zones (MRZs). The mineral land classification process identifies lands that contain economically significant mineral deposits. The primary objective of the classification and designation processes is to ensure, through appropriate lead agency policies and procedures, that mineral deposits of statewide or regional significance are available when needed.

The MRZs are established by the California Geologic Survey based on guidelines adopted by the California State Mining and Geology Board and under authority granted by SMARA of 1975. Lands in Western San Diego Production-Consumption (P-C) Region\(^{14}\) were initially classified in 1982 and subsequently designated by the State Mining and Geology Board in 1985. Additional classified lands were included in a 1996 update and by petition after 1996.

\(^{13}\) Public Resources Code, Division 2, Chapter 9, Article 4 State Policy of the Reclamation of Minced Lands, Section 2762(a).

\(^{14}\) The San Diego Production-Consumption boundary was determined by the California Division of Mines and Geology in 1982 to encompass the entire metropolitan area of San Diego County (urbanized areas); areas expected to urbanize within the next 10-30 years (urbanizing areas); and any resource areas which provided or were expected to provide aggregate material to these areas in the future.
Figure 2-3 illustrates the MRZs in the San Diego region. The definition of each zone is listed below:

MRZ-1: Areas where adequate geologic information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence.

MRZ-2: Areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present. A typical MRZ-2 area would include an operating mine or an area where extensive sampling has indicated the presence of a significant mineral deposit.

MRZ-3: Areas containing known mineral deposits that may qualify as mineral resources. Further exploration work within these areas could result in the reclassification of specific localities into other MRZ categories.

MRZ-4: Areas where the geologic information does not rule out either the presence or absence of mineral resources. (Additional information regarding mineral occurrence is needed.)

Mineral land classification of aggregate for the Western San Diego P-C Region was initiated in November 1980 by the state geologist. All major metropolitan portions of San Diego County (urbanized areas); areas that were expected to urbanize within the next 10 to 30 years (urbanizing areas); and any resource areas which currently provided or were expected to provide aggregate in the future were classified in this effort. The region was assigned a high priority because it was undergoing rapid urbanization.

The emphasis in this classification was placed on PCC aggregate. Sand, gravel, and crushed rock are classed as "construction materials" and provide bulk and strength to PCC. The material specifications for PCC aggregate are more restrictive than for other aggregate types; fewer sand and gravel deposits satisfy these specifications, therefore, they are considered scarce resources.\(^{15}\)

The MRZs are classified on the basis of an aggregate resource appraisal, which includes an analysis of geologic reports and maps, field investigations, an examination of active sand and gravel mining operations, analyses of drill-hole data, interpretation of aerial photographs, and evaluation of private company data. The physical and chemical rock material specifications, as determined by laboratory testing, must be known before any specific geologic deposit is assigned an MRZ-2 classification.\(^{16}\)


\(^{16}\) Ibid.
Figure 2-3
Mineral Resource Zones in the San Diego Region

Mineral Resource Zone (MRZ) Classification
- MRZ-1: Resource Not Present
- MRZ-2: Resource Present
- MRZ-3: Resource Potentially Present
- MRZ-4: Inconclusive
### Table 4-6
Fuel Consumption for San Diego Supply Scenarios
19 Million Ton Average Annual Estimated Demand 2010 to 2030

<table>
<thead>
<tr>
<th>Supply Option</th>
<th>Total Fuel Consumption (million gallons)</th>
<th>Fuel Consumption Outside Region</th>
<th>Fuel Consumption Within Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. All aggregate supplied by local mines via truck</td>
<td>5.6</td>
<td>WA</td>
<td>5.6</td>
</tr>
<tr>
<td>B. Local mines supply 9 million tons, balance of 10 million tons imported via truck</td>
<td>14.0</td>
<td>5.1</td>
<td>8.9</td>
</tr>
<tr>
<td>C. Local mines supply 16 million tons via rail and 2 million tons via ship</td>
<td>8.3</td>
<td>2.7</td>
<td>5.6</td>
</tr>
<tr>
<td>D. Local mines supply 9 million tons, 7 million tons imported via truck, 1 million tons via rail and 2 million tons via ship</td>
<td>14.2</td>
<td>6.3</td>
<td>7.9</td>
</tr>
<tr>
<td>E. All aggregate imported: 16 million tons by truck, 1 million tons via rail and 2 million tons via ship</td>
<td>21.8</td>
<td>10.9</td>
<td>10.9</td>
</tr>
</tbody>
</table>

### Figure 4-3
San Diego Supply Scenarios With Quantity of Fuel Consumed Attributable to Each Transport Mode
The city of San Diego's Council Policy 600-19 should be incorporated into the 2050 RTP/SCS as a meaningful policy to meet the requirement for equity in political and governmental decisions.
NAME: Jim Varvados
ADDRESS: City Heights
PHONE: 619-543-6100
EMAIL: jim.varvados@yahoo.com

☐ Please email me project updates in the future (email address required above)

COMMENT:
Noise levels in open recreation areas generated from adjacent streets should be set at 65-70 dBa. The City of San Diego is updating a policy to its Green Plans to adopt that threshold. It is a sustainable level for open space recreation.

Sincerely,

[Signature]

Please share your comments below. Please note that SANDAG documents are public records and may be disclosed to the public upon request. Comments also may be submitted to Rob Bundle, Principal Regional Planner, SANDAG, 401 B Street, Suite 600, San Diego, CA 92101 or rru@sandag.org. Thank you.

NAME: Jim Varvados
ADDRESS: City Heights
PHONE: 619-543-6100
EMAIL: jim.varvados@yahoo.com

☐ Please email me project updates in the future (email address required above)

COMMENT:
Review and recommendations about non-motorized transportation should be solicited from the city of San Diego's community planning groups, and studies should not rely on the advice of special interest groups in respect for planning non-motorized transportation.

Sincerely,

[Signature]
Please share your comments below. Please note that SANDAG documents are public records and may be disclosed to the public upon request. Comments also may be submitted to Rob Rundle, Principal Regional Planner, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101 or rru@sandag.org. Thank you.

NAME: Jim Urtasun
ADDRESS: City Heights
PHONE: 777-7777
EMAIL: jurtasun@email.com

☐ Please email me project updates in the future (email address required above).

COMMENT:

The 2030 RTP/SCS should advocate for historic preservation. Need not be detailed, but should be included.

SIGNATURE: [Signature]
February 15, 2013

VIA E-MAIL AND HAND DELIVERY

Rob Rundle, Principal Regional Planner

SANDAG
401 B Street, Suite 800
San Diego, CA 92101
E-Mail: rob.rundle@sandag.org

Re: Notice of Preparation for the Programmatic Environmental Impact Report for the 2050 Regional Plan

Dear Mr. Rundle:

We appreciate the opportunity to respond to the Notice of Preparation of a Programmatic Environmental Impact Report for the 2050 Regional Plan project (dated December 14, 2012). The Notice of Preparation (“NOP”) announces that SANDAG will be the lead agency for preparation of an Environmental Impact Report (“EIR”) in connection with the 2050 Regional Plan (“Project”). The EIR is intended to satisfy the requirements of the California Environmental Quality Act (“CEQA”).

Move San Diego is a non-profit organization devoted to advocating sustainable transportation and land use policies. As such, we support SANDAG’s efforts to integrate land uses, housing, transportation systems, infrastructure needs, and public investment strategies within a regional smart growth framework. We submit this letter with the aim of providing SANDAG with useful comments to ensure that preparation of the EIR reflects SANDAG’s goal to plan for long term sustainability in the region and that it fully complies with CEQA. We look forward to continuing this constructive dialogue with SANDAG throughout the preparation of the EIR.

Foremost among our requests is that in determining the EIR’s scope and content, SANDAG take a fresh look at the environmental impacts from implementing the Regional Plan and not feel constrained by the analysis of preexisting plans such as the 2050 RTP. Move San Diego firmly believes
this is an opportunity to move away from the perceived errors of the past and build a new consensus around sustainable regional planning.

A. Air Quality and Greenhouse Gas Emissions

We are confident that SANDAG will analyze the Regional Plan’s consistency with Assembly Bill 32, the California Global Warming Solutions Act of 2005 as well as Executive Order S-3-05. Less certain is whether the EIR will find that compliance with these landmark GHG laws will be feasible. Please make every effort to identify measures that will reduce GHG emissions and ensure consistency with these laws. Measures that are already being implemented, or which would have been implemented regardless of whether the Regional Plan gets approved, should not be counted.

B. Land Use/Population & Housing

Additionally, the EIR must analyze conformity with California’s landmark planning law, Senate Bill 375. As you know, SANDAG was the first metropolitan planning organization to prepare a regional transportation plan with a Sustainable Communities Strategy. So understandably there were some bumps in the road during preparation of the 2050 RTP. Please take the Regional Plan EIR as an opportunity to resolve any doubts that SANDAG is fully committed to SB 375 compliance. The SCS is important because it will show how transportation planning and development patterns interact to reduce GHG emissions. Therefore, the EIR should minimize or eliminate deferral to local agencies of analysis or implementation of mitigation measures. The Regional Plan will evaluate new Land Use Scenarios in order to reduce long term GhG emissions. The EIR should carefully consider and disclose whether the Regional Plan’s planning assumptions are inconsistent with local agency regulations such as general plans and zoning ordinances. As the regional MPO, this is SANDAG’s responsibility, not just the local agencies’. The EIR should disclose to SANDAG’s board members whether the Regional Plan can actually be implemented.

The EIR should provide additional in depth analysis on the planned and potential Smart Growth Opportunity Areas called for in the Regional Plan, as these are the area’s most likely to be developed with higher densities, with an emphasis on multi modal transportation and are the areas that will likely afford the most new opportunities for jobs/housing fit.

C. Transportation

Major transportation projects should be focused on locations that support smart growth, and the EIR should analyze to what extent transportation projects increase VMT, air quality impacts, noise, and GHG emissions. Please also ensure that the EIR consider indirect transportation impacts. One example is the potential of managed freeway lane projects to induce growth in distant areas, which would result in increased VMT and associated environmental impacts.

To ensure a complete and accurate assessment of environmental impacts, please include trip performance tables in the EIR. For the Project and each alternative, please indicate the
proportion of households would be served by transit, the proportion of households within a 30-minute walk, bike, transit and vehicular commute from employment, and the proportion of households within a half-mile, or ten minute walk from transit stops.

We request that the EIR and its technical analyses use innovative transit models and tools that would accurately analyze the RTP’s environmental impacts. For example, few transit models account for the traffic benefits of increased biking and pedestrian mode share, and few models account for market demand when determining how mode decisions are made.

Also, the EIR should analyze the effect of smart growth housing and active transportation on public health in order to provide documentation about the impacts of funding policy decisions. Childhood obesity is approaching epidemic proportions in San Diego County. The 2050 RTP notes in 2007, 33 percent of county residents were overweight and nearly 22 percent were obese. Staying the course and planning mostly for automobile-dependent modes could potentially increase obesity, diabetes respiratory disease. The EIR should consider the work of California Department of Public Health Epidemiologist Dr. Neal Maizlish "Health co-benefits and transportation-related reductions in greenhouse gas emissions in the San Francisco Bay Area", which appears in the February 14, 2013 online issue of the American Journal of Public Health, http://ajph.aphapublications.org/doi/pdf/10.2105/AJPH.2012.300939.

D. Environmental Justice

We request the EIR for the combined Regional Plan provide the analysis to determine if the Project Alternatives have made significant changes to communities already burdened with pollution. It will be critical to disclose how the Regional Plan addresses air pollution impacts on communities already severely impacted by air pollution. The AG specifically recommends the EIR as the place to determine whether or not subpopulations may be particularly sensitive to increase in air pollution, and whether or not these communities at near their capacity to bear any additional pollution burden.

E. Alternatives

The NOP indicates that there will be three project alternatives: 1) No Project Alternative; 2) Intensified Land Use Distribution Alternative; and 3) Modified Transit Network Alternative. Other than the elimination of the Transportation Demand Management/System Management Alternative, the alternatives listed in the NOP are identical to those analyzed in the 2050 RTP EIR. We hope this is not an example of recycling old analysis and limiting the conclusions of this EIR based on the 2050 RTP EIR. Move San Diego emphasizes its belief that this is a fresh opportunity for SANDAG to demonstrate its commitment to a sustainable region.

In addition to the alternatives listed above, please analyze an Unconstrained Revenue Alternative which would include the construction of all housing infrastructure projects without regard as to their economic feasibility. We believe it is important for SANDAG decisionmakers as well as the public to know what the environmental impacts would be if the funds were available for all desired projects. Although this alternative would not meet the Project’s
objectives, because it would be infeasible, it would be useful as a planning tool and would enhance the EIR. Perhaps it would even be the impetus to identify additional funding for aspects of the Regional Plan.

F. Conclusion

We appreciate the opportunity to comment on the NOP and we respectfully request that you thoroughly review each of these comments and incorporate them in the EIR. As you proceed with the Regional Plan’s environmental review process, we look forward to discussing these issues with you further. Please do not hesitate to contact us if you require more information regarding these comments.

Sincerely,

Elyse Lowe

for MOVE SAN DIEGO

SMRH:408058555.1
December 18, 2012

Mr. Ron Rundle, Principal Regional Planner
San Diego Association of Governments (SANDAG)
401 "B" Street, Suite 800
San Diego, CA 92101

Re: SCH#2010041061 CEQA Notice of Preparation (NOP); draft Programmatic Environmental Impact Report (DEIR) for the “2050 Regional Transportation Plan Sustainable Communities PEIR Project;” located in San Diego County, California

Dear Mr. Rundle:

The California Native American Heritage Commission (NAHC) is the State of California ‘trustee agency’ for the preservation and protection of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as ‘consulting parties’ under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendment s effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a ‘significant effect’ requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as ‘a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance.” In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the ‘area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the ‘area of potential effect’ or APE previously. The NAHC is aware that San Diego County has numerous Native American cultural resources; therefore, careful planning with local tribes is advised.

The NAHC ‘Sacred Sites,’ as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.
Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seq. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interiors Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's Standards include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254( r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.
Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends ‘avoidance’ of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List
Native American Contacts
San Diego County
December 18, 2012

Barona Group of the Capitan Grande
Edwin Romero, Chairperson
1095 Barona Road , Diegueno
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sue@barona-nsn.gov
(619) 443-6612
619-443-0681

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 , Diegueno
Valley Center, CA 92082
allenl@sanpasqualband.com
(760) 749-3200
(760) 749-3876 Fax

Ewilaapaayp Tribal Office
Robert Pinto Sr., Chairperson
4054 Willows Road, Diegueno/Kumeyaay
Alpine, CA 91901
wmicklin@leasingrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

lipay Nation of Santa Ysabel
Virgil Perez, Spokesman
PO Box 130 , Diegueno
Santa Ysabel, CA 92070
brandietaylor@yahoo.com
(760) 765-0845
(760) 765-0320 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 , Diegueno/Kumeyaay
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gparada@lapostacasino.
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619-478-2125

Sycuan Band of the Kumeyaay Nation
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619 445-2613
619 445-1927 Fax

Manzanita Band of Kumeyaay Nation
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(619) 766-4957 Fax

Viejas Band of Kumeyaay Indians
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Alpine, CA 91903
jrothauff@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010041061: CEQA Notice of Preparation (NOP); Draft Programmatic Environmental Impact Report (DEIR) for the 2050 Regional Transportation Plan Sustainable Communities Strategic Programmatic EIR; San Diego County, California.
Native American Contacts
San Diego County
December 18, 2012

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road, Alpine, CA 92001
(619) 445-0385

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270, Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1, Campo, CA 91906
chairoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

Pala Band of Mission Indians
Historic Preservation Office/Shasta Gaughen
35008 Pala Temecula Road, Pala, CA 92059
PMB 50
(760) 891-3515
sgaughen@palatribe.com
(760) 742-3189 Fax

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612, Jamul, CA 91935
jamulrez@sctdv.net
(619) 669-4785
(619) 669-48178 Fax

Pauma & Yuima Reservation
Randall Majel, Chairperson
P.O. Box 369, Pauma Valley, CA 92061
paumareservation@aol.com
(760) 742-1289
(760) 742-3422 Fax

Los Coyotes Band of Mission Indians
Shane Chapparosa, Chairman
P.O. Box 189, Warner, CA 92086
(760) 782-0711
(760) 782-2701 FAX

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477, Temecula, CA 92593
(951) 770-8100
pmacarro@pechanga-nsn.gov
(951) 506-9491 Fax

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010041051; CEQA Notice of Preparation (NOP); Draft Programmatic Environmental Impact Report (DPEIR) for the 2050 Regional Transportation Plan Sustainable Communities Strategic Programmatic EIR; San Diego County, California.
Native American Contacts
San Diego County
December 18, 2012

Rincon Band of Mission Indians
Vincent Whipple, Tribal Historic Preationv. Officer
P.O. Box 68   Luiseno
Valley Center, CA 92082
jmurphy@rincontribe.org
(760) 297-2635
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Kumeyaay Cultural Repatriation Committee
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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH/2010041061; CEQA Notice of Preparation (NOP); Draft Programmatic Environmental Impact Report (DEIR) for the 2050 Regional Transportation Plan Sustainable Communities Strategic Programmatic EIR; San Diego County, California.
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San Diego County
December 18, 2012

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Native American Contacts
San Diego County
December 18, 2012

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(KCRC is a Coalition of 12
Kumeyaay Governments

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SCH#2010041081; CEQA Notice of Preparation (NOP); Draft Programmatic Environmental Impact Report DPEIR) for the 2050 Regional Transportation Plan Sustainable Communities Strategic Programmatic EIR; San Diego County, California.
March 26, 2013

Mr. Rob Rundle
SANDAG
401 B Street, Suite 800
San Diego, California 92101

Re: Comment Letter for 2050 Regional Plan Programmatic Environmental Impact Report

Dear Mr. Rundle:

Thank you for the opportunity to comment on the Programmatic Environmental Impact Report (EIR) being prepared for the San Diego Association of Governments’ (SANDAG) 2050 Regional Plan. Staff from the San Diego Unified Port District’s (District) Environmental and Land Use Management Department reviewed the Notice of Preparation (NOP) and attended SANDAG’s public scoping meeting held on Thursday, January 10, 2013. Based on review of the NOP and attendance at the public scoping meeting, District staff has the following comments:

At the public scoping meeting, SANDAG staff explained the scheduling and sequencing of the 2050 Regional Plan and associated EIR. District staff understood that the 2050 Regional Plan has not yet been prepared, so the “project” that will be analyzed in the EIR has not yet been defined. For this reason, District staff urges SANDAG staff to work closely with the District to gather necessary information for the preparation of the forthcoming 2050 Regional Plan and associated EIR. Due to the complexity of the District’s jurisdictional boundaries throughout the cities of San Diego, National City, Chula Vista, Coronado, and Imperial Beach, it is important for SANDAG staff to work collaboratively with District staff to accurately determine land and water use designations, transportation routes, recreational resources, and visual resources within the coastal zone in the cities listed above. Also, necessary information related to District maritime operations (i.e., cruise ship and cargo terminal operations) should be provided by District staff to ensure accurate and up-to-date information. A copy the District’s Port Master Plan can be found online at http://www.portofsandiego.org/about-us.html.

SANDAG staff also explained that the 2050 Regional Plan will incorporate an update to SANDAG’s Regional Transportation Plan (RTP). The current RTP was prepared with extensive input from District staff related to infrastructure and goods movement projects on District tidelands. In order to ensure that current and future infrastructure needs and goods movement projects are considered in SANDAG’s updated RTP, District staff is currently participating in SANDAG’s Freight Stakeholders Working Group. The District would like to continue working closely with SANDAG to ensure that current and future infrastructure and goods movement
projects on District tidelands are accurately captured and represented in the 2050 Regional Plan, which will include the updated RTP.

With regards to the EIR, District staff requests that the following sections be included and adequately analyzed in the EIR for the forthcoming 2050 Regional Plan: aesthetics, agricultural and forestry resources, air quality, biological resources, geology and soils, greenhouse gas emissions/sea level rise, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities. District staff also requests that the EIR for the 2050 Regional Plan include a comprehensive analysis of the RTP. It is the District’s expectation that the environmental analysis for District infrastructure and goods movement projects could potentially be tiered from the 2050 Regional Plan EIR.

Finally, District staff would appreciate continued notification regarding the progress of the 2050 Regional Plan and associated EIR.

Please contact District staff at (619) 686-6283 with any questions regarding the information detailed above.

Sincerely,

[Signature]

Paul Fanfera
Acting Director
Environmental and Land Use Management
San Diego Unified Port District
February 15, 2013

Rob Rundle
401 B Street, Suite 800
San Diego, CA 92101

Subject: SanDiego350.org Comments on the Programmatic Environmental Impact Report for the 2050 Regional Plan

Dear Mr. Rundle:

SanDiego350.org would like to take this opportunity to submit comments on the Programmatic Environmental Impact Report (PEIR) for the 2050 Regional Plan. We see the need to address climate change in a strong and forceful manner in the 2050 Regional Plan, through both climate change mitigation and adaptation strategies. Climate change cannot be ignored in our regional planning efforts, and we must make the best effort to reduce our greenhouse gas (GHG) emissions and prepare for the effects of climate change, many of which we currently are facing.

Most significantly, the methodology and consideration of climate change in the previous Regional Transportation Plan was deemed inadequate by multiple sources. We hope that SANDAG does not continue to follow this path, and instead chooses to make a bold and important step towards addressing GHG emissions in San Diego County. This letter outlines five important points that we feel should be included in the upcoming 2050 Regional Plan.

1. Compliance with Existing Laws and Consideration of Climate Change

Climate change needs to be seriously addressed by SANDAG in this Regional Plan. As you should recall, several entities including Cleveland National Forest Foundation, Center for Biological Diversity and Sierra Club California filed a lawsuit against SANDAG because the Regional Transportation Plan (RTP) did not include adequate measures to reduce GHG emissions and address climate change. Attorney General Kamala Harris filed a motion to intervene in the lawsuit. The methods used to draft the RTP should not be used again for the Regional Plan - real and comprehensive considerations for climate change and emissions reductions must be included.

The primary source of greenhouse gas emissions in San Diego results from transportation and therefore a corresponding reduction in our GHG emissions should result from changes to our transportation system and land use policies. To underscore the importance of these policies, the City of San Diego Climate Mitigation and Adaptation Plan (CMAP) (draft, October 2012) states that “land use changes are cited by nearly every expert as the most important approach for meeting the 2050 target [of 80% reduction in GHG emissions below 2008 levels]” (p. 4-15). The Regional Plan should not be a plan of freeway
expansion. SB 375 mandates that regional transportation agencies significantly reduce GHG emissions through transportation and land use. GHG reductions should follow what is scientifically accepted and outlined in S-3-05: a reduction of GHG emissions to 80% below 1990 levels annually by 2050.

*Figure 1.*

[Image: The Total Emission Picture]

Figure 1, from the *October 28, 2011 SANDAG Meeting Materials: Slideshow Presentation on Large Majority of Californians Support Implementation of Climate Change Laws*, illustrates SANDAG’s projected emissions scenario. How does this keep in line with what is required by SB 375? The subject of the presentation was that a “Large Majority of Californians Support Implementation of Climate Change Laws.” SANDAG must implement policies that will reduce driving, increase energy conservation, and promote alternative transportation. The scenario displayed in Figure 1 should not occur in San Diego.

Under CEQA, SANDAG will have to assure compliance to evaluate a project’s effects “on the physical environment.” This needs to include a thorough analysis of the effects of climate change. SANDAG should therefore use these legal requirements, such as S-3-05, as proxies for evaluating significance under CEQA. Other agencies have determined for these to be acceptable thresholds, and SANDAG should do the same.

All jurisdictions within the State of California are required by AB 32 to submit a climate action plan, which details how the jurisdiction will achieve the mandated emissions reductions. The Draft City of San Diego CMAP relied on the RTP for almost all transit-related emissions reductions measures. Therefore, passage of a rigorous 2050 Regional Plan is very important because it is likely that additional regional plans will use the 2050 Regional Plan as a base model for land use and transportation emissions reductions. If the Regional Plan is not strong in emissions reductions, then how can other climate action plans achieve their targeted scenarios for transit?

### 2. Promote Sustainable Land Use

There is overwhelming public support for increasing transit and encouraging smart growth policies; it was found that 55% of San Diego County voters support the expansion of public transit and nearly 75% support smart land use practices. San Diegans want to live in walkable, bikeable communities. People come from all over California, the United States, and the world to live here, and they do not arrive to California with visions of traffic and suburban sprawl. We live in San Diego to be outside, at the beach, enjoying the activities that San Diego has to offer. Smart growth policies should be implemented
immediately to promote a sustainability which aligns with the San Diego lifestyle.

Specifically, we would like to see the following items included in the Regional Plan and implemented in our neighborhoods, which would both increase the livability of these areas and reduce greenhouse gas emissions:

a) Encourage infill or redevelopment, especially near transit centers, in existing city centers, and locate amenities nearby;

b) Improve transit service for Trolley, Coaster, Sprinter, and develop more light rail and streetcars in urban areas (e.g. through Hillcrest, North Park);

c) Provide transit to popular destinations such as Balboa Park, the beaches, airport, universities;

d) Preserve urban greenspaces, canyon linkages, limit developments around parks, encourage infill versus new development in suburban areas; and

e) Substantially increase bike lanes and facilities (e.g. bike lanes, lockers, bike boxes at stop lights).

SANDAG is the region’s transportation agency. It should and must take responsibility for driving land use and transportation in the region, including mass transit.

3. Implement Measures to Reduce Greenhouse Gas Emissions

We see that the aforementioned land use and transit measures, as well as others, will be critical in implementing a sustainable land use strategy that supports the lifestyles that we love in San Diego. The other critical part of this will be to substantially reduce greenhouse gas emissions. This should be accomplished through increased use of localized renewable energy, specifically distributed PV. As Mayor Filner declared in his State of the City Address, “I will soon mandate that all municipal public buildings be equipped with solar power and urge all government agencies and businesses to do the same.” It is our hope that SANDAG will share in and encourage the Mayor’s vision for San Diego. Estimates have identified approximately 7,000 MW of untapped rooftop solar potential in San Diego that should be utilized.

Additional emissions reductions measures that should be included in the Regional Plan are:

a) Enact a public awareness campaign to encourage use of mass transit, energy conservation, and promote sustainable living in San Diego;

b) Install solar panels where possible and feasible and cover parking lots with solar panels;

c) Should improve electric vehicle infrastructure, including installation of electric charging stations where appropriate;

d) Encourage alternative transportation through implementation of measures that discourage driving, such as increasing parking fees in urban areas and create preferred parking for electric vehicles; and

e) Support policies and measures needed to implement a CCA.

4. Implementation and Monitoring Plan

Approval of an Implementation and Monitoring Plan as part of the Regional Plan will be key to ensuring success of the GHG reductions measures, and compliance with statewide goals set by SB 375. The Regional Plan should include a discussion of actions that will reduce emissions and their implementation dates. Certain items should be prioritized that either a) take longer to implement, or b) are important for
guiding future development or regional planning. Measures to improve mass transit and increase smart growth need to be implemented in the near future (e.g. within the first five years of the plan), not until the end of the lifetime of the 2050 Regional Plan. Implementation and success of these strategies should be trackable and enforceable. Also, the Regional Plan should not rely on voluntary strategies or federal or state actions to reduce greenhouse gas emissions. Concrete, feasible goals need to be coherently outlined, along with funding mechanisms.

5. Adaptation

Finally, San Diegans are already feeling the impacts of climate change. Adaptation to climate change will need to be considered in the 2050 Regional Plan. This will include consideration of climate change impacts in planning efforts, such as rising tide and increasing wildfires. These measures will be extremely important. Within the last year we have seen the devastating impacts of severe weather (drought, heat wave, wildfires, strong storm surges) and the crippling effects on economy, lifestyle, and community. Communities in New York and New Jersey are still without electricity after Hurricane Sandy. We cannot stress enough the importance of thorough planning for worst-case scenarios. It will be easier to adapt now, instead of when it’s too late.

It will also be critical for adaptation strategies to be identified for target public groups identified in the Public Involvement Plan, including minorities, disabled persons, the elderly. Specific identification of adaptation measures that address these groups is needed. Adaptation should also include measures to conserve open space areas, particularly in urban areas. This would be considered a “no regrets” measure, as it would provide valuable habitat for wildlife, trap greenhouse gases, provide a buffer against the heat island effect, and provide shade and aesthetic values.

--

It is our hope that SANDAG has learned from its submittal of the RTP and the subsequent lawsuit. Climate change needs to be considered seriously in the 2050 Regional Plan. We appreciate the ability to comment on the Programmatic Environmental Impact Report for the 2050 Regional Plan. Thank you for considering our comments.

Sincerely,

Emily Wier
Steering Committee Member
SanDiego350.org
January 3, 2013

Mr. Rob Rundle
Principal Regional Planner
San Diego Association of Governments (SANDAG)
401 B Street, Suite 800
San Diego, CA 92101

RE: Notice of Preparation (NOP) of a Programmatic EIR for the 2050 Regional Plan

Dear Mr. Rundle:

The Southern California Regional Rail Authority (SCRRRA) has received the NOP for SANDAG’s Programmatic EIR for the 2050 Regional Plan. Thank you for the opportunity to comment on key issues relative to SCRRRA operations of the railroad into San Diego County and potential contributions to your long range regional plans. As background information, SCRRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink that provides transportation to commuters throughout six counties. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (METRO), San Bernardino Associated Governments (SANBAG), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC). We also serve San Diego County via commuter rail service into and out of the Oceanside station from the north.

SCRRRA would like to see addressed in EIR for the 2050 Regional Plan some improvements to the following areas:

1. Station enhancements to provide better transfers between Coaster, Metrolink and Sprinter at the Oceanside Station.
2. Flexibility and improvements to the train schedules to provide better connectivity to all modes of transportation in and out of Oceanside Station providing better opportunities for passengers to move between San Diego and points north.

Thank you again for cooperating with SCRRRA to help ensure the development of a successful Regional Plan. If you have any questions regarding these comments please contact me at (213) 452-0258 or via e-mail at depallom@scrrra.net.

Sincerely,

Michael P. DePallo
Chief Executive Officer

cc: Gray Cray
    Bill Doran
Notice of Preparation

December 14, 2012

To: Reviewing Agencies
Re: 2050 Regional Transportation Plan/Sustainable Communities Strategies Programmatic EIR
SCH# 2010041061

Attached for your review and comment is the Notice of Preparation (NOP) for the 2050 Regional Transportation Plan/Sustainable Communities Strategies Programmatic EIR draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Rob Rundle
San Diego Association of Governments (SANDAG)
401 B Street, Suite 800
San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency
The Regional Plan will include the merging of the Regional Transportation Plan (RTP), the Sustainable Communities Strategy (SCS), and the Regional Comprehensive Plan (RCP) in order to provide an easily accessible document that includes an overall vision for the San Diego region. The Regional Plan will address the region's housing, economic, environmental, and transportation and other related needs in the context of long-term sustainability.

Lead Agency Contact
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Agency: San Diego Association of Governments (SANDAG)
Phone: 619-699-6949
Address: 401 B Street, Suite 800
City: San Diego
State: CA
Zip: 92101

Project Location
County: San Diego
City:
Region:
Cross Streets:
Lat / Long:
Parcel No.:
Range:
Section:
Base:

Proximity to:
Highways: All in San Diego County
Airports: All in San Diego County
Railways: All in San Diego County
Waterways: All In San Diego County
Schools: All in San Diego County
Land Use:

Project Issues: Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies: Resources Agency; California Coastal Commission; Department of Parks and Recreation; Native American Heritage Commission; Office of Emergency Management Agency, California; Department of Fish and Game, Region 5; Public Utilities Commission; State Lands Commission; Caltrans, Division of Aeronautics; Caltrans, Division of Transportation Planning; California Highway Patrol; Department of Housing and Community Development; Caltrans, District 11; Air Resources Board, Transportation Projects; State Water Resources Control Board

Date Received: 12/14/2012
Start of Review: 12/14/2012
End of Review: 02/15/2013

Note: Blanks in data fields result from insufficient information provided by lead agency.
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<td>Caltrans, District 8</td>
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<tr>
<td>Dan Kopolsky</td>
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<td>Gayle Rosander</td>
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| Caltrans, District 1  |
| Rex Jackman           |
| Caltrans, District 2  |
| Marcelino Gonzalez    |
| Caltrans, District 3  |
| Gary Arnold           |
| Caltrans, District 4  |
| Erik Alm              |
| Caltrans, District 5  |
| David Murray          |
| Caltrans, District 6  |
| Michael Nevarro       |
| Caltrans, District 7  |
| Dianna Watson         |

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<tr>
<td>PHIL Crader</td>
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| Department of Pesticide Regulation   |
| CEQA Coordinator                     |

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<th>Other</th>
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**NOI Distribution List**

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<tr>
<th>Resources Agency</th>
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<tr>
<td>Nadell Gayou</td>
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<td>Elizabeth A. Fuchs</td>
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<th>Colorado River Board</th>
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<td>Gerald R. Zimmerman</td>
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<td>Elizabeth Carpenter</td>
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<tr>
<td>Eric Knight</td>
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| Cal Fire                      |
| Dan Foster                   |
|                               |

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<th>Central Valley Flood Program</th>
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<td>James Horita</td>
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<td>Ron Parsons</td>
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<td>Environmental Stewardship</td>
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| California Department of     |
| Resources, Recycling &       |
| Recovery                     |
| Sue O'Leary                   |
|                               |

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<tr>
<th>S.F. Bay Conservation &amp; Dev't Comm.</th>
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<td>Steve McAdam</td>
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<tr>
<td>Delta Protection Commission</td>
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<tr>
<td>Michael Machado</td>
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<tr>
<td>Cal EMA (Emergency Management Agency)</td>
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<tr>
<td>Dennis Castro</td>
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<tr>
<td>Governor's Office of Planning &amp; Research</td>
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<td>State Clearinghouse</td>
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<tr>
<td>Native American Heritage Comm.</td>
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<td>Debbie Treadway</td>
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Last Updated 6/26/2012
Memorandum

Date: January 2, 2013
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 2010041061
2050 Regional Transportation Plan/Sustainable Communities Strategies Programmatic EIR

On December 14, 2012, the State Clearinghouse submitted the above Notice of Preparation to your agency for review. Please note that the project title referenced on the Acknowledgement letter and document details was incorrect.

The correct project title is:

2050 Regional Plan Programmatic EIR

We apologize for this error and request that you note the above information for your files. All other project information remains the same.

cc: Rob Rundle
San Diego Association of Governments (SANDAG)
401 B Street, Suite 800
San Diego, CA 92101
NOI Distribution List

Resources Agency
- Resources Agency
  - Nadell Gayou
- Dept. of Boating & Waterways
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  - Elizabeth A. Fuchs
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  - James Herota
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  - Environmental Stewardship
  - Section
- California Department of Resources, Recycling & Recovery
  - Sue O'Leary
  - Steve McAdam
- Dept. of Water Resources
  - Resources Agency
    - Nadell Gayou
- Conservancy

Fish and Game
- Dept. of Fish & Game
  - Scott Flint
  - Environmental Services Division
- Fish & Game Region 1
  - Donald Koch

Other Departments
- Food & Agriculture
  - Steve Shaffer
  - Dept. of Food and Agriculture
- Depart. of General Services
  - Public School Construction
- Dept. of General Services
  - Anna Garbeff
  - Environmental Services Section
- Dept. of Public Health
  - Bridgette Binning
  - Dept. of Health/Drinking Water

Independent Commissions, Boards
- Delta Protection Commission
  - Michael Machado
- Cal EMA (Emergency Management Agency)
  - Dennis Castirillo
- Governor's Office of Planning & Research
  - State Clearinghouse
- Native American Heritage Comm.
  - Debbie Treadway

County: SAN DIEGO

Public Utilities Commission
- Leo Wong
State Lands Commission
- Marina Brand
Tahoe Regional Planning Agency (TRPA)
- Cherry Jacques

Caltrans - Division of Aeronautics
- Philip Crimmins
Caltrans - Planning
- Terri Pencovich
California Highway Patrol
- Suzann Ikeuchi
  - Office of Special Projects
Housing & Community Development
- CEQA Coordinator
  - Doug Itto
  - Housing Policy Division

Cal EPA

Air Resources Board
- Jim Lerner
- Transportation Projects
  - Doug Itto
- Industrial Projects
  - Mike Tolsstrup

State Water Resources Control Board
- Regional Programs Unit
  - Division of Financial Assistance
State Water Resources Control Board
- Student Intern, 401 Water Quality Certification Unit
  - Division of Water Quality
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  - Dept. of Toxic Substances Control
  - CEQA Tracking Center

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- CEQA Coordinator

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Caltrans, District 10
- Tom Dumas
Caltrans, District 11
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Caltrans, District 12
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Caltrans, District 12
- Marlon Regisford

Regional Water Quality Control Board (RWQCB)
- RWQCB 1
  - Cathleen Hudson
  - North Coast Region (1)
- RWQCB 2
  - Environmental Document Coordinator
  - San Francisco Bay Region (2)
- RWQCB 3
  - Central Coast Region (3)
- RWQCB 4
  - Teresa Rodgers
  - Los Angeles Region (4)
- RWQCB 5
  - Central Valley Region (5)
- RWQCB 5F
  - Central Valley Region (5)
  - Fresno Branch Office
- RWQCB 5R
  - Central Valley Region (5)
  - Redding Branch Office
- RWQCB 6
  - Lahontan Region (6)
- RWQCB 6V
  - Lahontan Region (6)
  - Victorville Branch Office
- RWQCB 7
  - Colorado River Basin Region (7)
- RWQCB 8
  - Santa Ana Region (8)
- RWQCB 9
  - San Diego Region (9)

Other

SCH# 2010041061

Last Updated 6/26/2012
Rob:

Thank you for the opportunity to respond to the Notice of Preparation for the SANDAG 2050 Regional Plan Programmatic EIR ("EIR"). Given that the draft 2050 Regional Plan is not yet available for consideration, the City is requesting an opportunity to provide comments to the Regional Plan and related environmental impact review issues during the preparation of the EIR in advance of the document release for public review. Thank you in advance for your consideration of this request.

Cordially,

Susan Vandrew Rodriguez
Associate Planner
City of San Marcos
760-744-1050 ext. 3237
svandrew@san-marcos.net
www.ci.san-marcos.ca.us