

Attachment C: Public Participation

Table of Contents

Introduction	3
Responses	3
Memorandum to the Board of Directors	10
Public Hearing Transcript	14
Web, Workshop and Email Comments.....	46
Letters	60
Reference.....	135

Public Participation

Introduction

In September 2022, the San Diego Association of Governments (SANDAG) Board directed staff to prepare an amendment to the 2021 Regional Plan (Amendment). The proposed Amendment was available for public review and comment from June 13, 2023, through August 8, 2023, to solicit public input on the proposed Amendment. During the public review period, four public meetings were held: a public hearing on June 23, 2023, and three virtual workshops on July 18, July 31, and August 8, 2023.

SANDAG also received comments on the proposed Amendment through an online comment response form; and via e-mail. A total of 56 public comments were received that commented on the proposed Amendment via the online comment response form, email, or letter, which are included in this document.

Responses

The following section provides SANDAG responses to the comments received organized by the following topic areas:

- Opposition to the Regional RUC
- Support for the Regional RUC
- Requesting Clarification on the Impacts of Removing the Regional RUC
- Social Equity
- Land Uses, Specific Transportation Network Elements, and Electric Vehicle Concerns
- Opposition to SANDAG
- Public Outreach Efforts
- Revenues and Costs

SANDAG also responded to selected questions received during the June 23, 2023, public hearing in a July 13, 2023, memorandum to the Board of Directors. The public hearing transcript and memorandum are included in this Attachment C.

Opposition to the Regional RUC

SANDAG received multiple comments expressing opposition to the regional RUC. Most of these comments opposed any additional fees associated with driving and several expressed concern over the potential financial hardship of a regional RUC. Some commentors also expressed concerns over tracking people's movements and the regional RUC limiting mobility and creating "15-minute cities."

SANDAG appreciates the feedback received on concerns about additional costs. At the direction of the SANDAG Board of Directors, the 2030 implementation of the regional RUC is proposed to be removed from the 2021 Regional Plan, and so these concerns are addressed by the Amendment itself.

In response to comments received about tracking people's movements, any program or policy with the potential for privacy impacts would need to satisfy California's extensive privacy laws and regulations. However, because this Amendment proposes to remove the regional RUC from the 2021 Regional Plan, these concerns are addressed by the Amendment

itself. Similarly, neither the 2021 Regional Plan nor the regional RUC were intended to confine residents to a limited geographical area. While 15-minute cities are a planning concept for creating convenient access to resources within a walkable or bikeable range of 15 minutes to expand access to resources, SANDAG did not use the 15-minute city concept in developing either the 2021 Regional Plan or the Amendment.

Support for the Regional RUC

SANDAG also received multiple comments in support of the regional RUC. These comments expressed concern over the VMT, GHG, and air quality implications of removing the regional RUC and that the Amendment was setting the region back in achieving GHG and air quality goals and creating future environmental and financial risks for our region. Other commentors expressed concern over how removing the regional RUC could limit the expansion of transit options in our region. Additional comments expressed support for a modified regional RUC that applied to electric vehicles but not gas-powered vehicles or for a means-based regional RUC that integrated personal privacy protections.

SANDAG appreciates the feedback received on concerns about the adverse environmental impacts of removing the regional RUC; these are disclosed in the SEIR that SANDAG has prepared for the proposed Amendment, and will be considered by the Board of Directors prior to their taking action on the proposed Amendment. As discussed in Section 4 of the Amendment, the removal of the regional RUC would decrease the cost to operate an automobile, resulting in an increase in single occupancy drivers. Consequently, the Amendment would result in an increase in VMT, GHG emissions, and air pollutants from tailpipe emissions compared to the adopted 2021 Regional Plan. Similarly, while the air quality impacts of removing the regional RUC do not rise to a level of regional significance, there are greater emissions of criteria pollutants and new or substantially more severe significant air quality impacts under the Amendment than under the 2021 Regional Plan. The Amendment would expose new receptors to substantial concentrations of toxic air contaminant emissions and increase the incremental area of threshold exceedance for new land uses. Although the Amendment has greater GHG and air quality impacts than the 2021 Regional Plan, the Amendment does still meet SB 375 regional GHG emissions reduction targets, and state and federal air quality standards. The SANDAG Board of Directors has proposed that the regional RUC be removed from the 2021 Regional Plan. However, there are many policies and programs to reduce VMT, GHG, and improve regional air quality, and SANDAG is committed to identifying the best policies for our region that will meet required state and federal standards in the 2025 Regional Plan. SANDAG will be holding multiple public outreach events throughout the County to ensure that interested members of the public can understand and provide feedback on the development of the 2025 Regional Plan.

Requesting Clarification on the Impacts of Removing the Regional RUC

SANDAG received comments requesting clarification about the impact of removing the regional RUC on implementation of the proposed state RUC, on funding opportunities for the region, and how removing the regional RUC impacts the 2025 Regional Plan.

SANDAG appreciates the feedback received requesting clarification on the impacts of removing the regional RUC. The proposed state RUC is entirely separate from the regional RUC. The proposed Amendment would remove the regional RUC from the 2021 Regional Plan but has no impact on the proposed state RUC, which is outside of SANDAG's authority. The adopted 2021 Regional Plan assumes the San Diego region will receive future revenues

resulting from a state RUC, which is still in the pilot program phase. Discussion of the state RUC remains unchanged from the adopted 2021 Regional Plan. The proposed Amendment assumes a state RUC of 0.7 cents (\$2020) starting in 2030 and increasing to 1.2 cents by 2050 to cover the funding gap created as fuel taxes diminish over time due to greater fuel efficiency and a shift to zero emission vehicles. The State has not released a start date for the state RUC; however, 2030 is consistent with the assumption made by other California MPOs.. More information on the status of the state RUC can be found here: [California Road Charge program](#).

At present, SANDAG is not aware of any risks to local or regional state and federal funding eligibility resulting from removing the regional RUC. Adequate funding sources have been identified to implement the adopted 2021 Regional Plan without funding from a regional RUC.

The 2025 Regional Plan is SANDAG's next major update of the region's long range transportation planning document and is separate from the Amendment to the 2021 Regional Plan. SANDAG will be holding multiple public outreach events throughout the County to ensure that interested members of the public can provide feedback on the development of the 2025 Regional Plan. A concept for the 2025 Regional Plan without the regional RUC will be presented later this year.

Social Equity

Comments were received expressing concerns over the broad social equity impacts of removing the regional RUC, the impacts associated with PM 2.5 emissions on disadvantaged communities specifically and San Diego residents generally, and the need to develop and fund affordable and accessible public transit.

SANDAG appreciates the feedback shared over the social equity impacts of removing the regional RUC. As discussed in Attachment 1 to the Errata: Amendment Social Equity Analysis, the proposed Amendment would not result in either a disparate impact or disproportionate effect on disadvantaged communities in the San Diego region. Additionally, the proposed Amendment would result in a less than 2 percent change in all social equity performance measures compared to the adopted 2021 Regional Plan. Specific to PM 2.5 emissions, there is less than a 1 percent change between the adopted 2021 Regional Plan and the Amendment (Attachment 1 to the Errata: Amendment Social Equity Analysis, Table SE4-20). The adopted 2021 Regional Plan also identified specific transportation strategies to reduce pollution exposure in disadvantaged communities, which are included in Appendix H: Social Equity: Engagement and Analysis of the adopted 2021 Regional Plan. These strategies remain unchanged with the Amendment.

As to suggestions for future transit projects, the 2025 Regional Plan is SANDAG's next major update of the region's long range transportation planning document and is separate from the Amendment to the 2021 Regional Plan. SANDAG will be holding multiple public outreach events throughout the County to ensure that interested members of the public can provide feedback on the development of the 2025 Regional Plan. There will be opportunities for the public to suggest measures for SANDAG and transit agencies to consider that would increase opportunities for affordable and accessible public transit.

Land Uses, Specific Transportation Network Elements, and Electric Vehicle Concerns

SANDAG received several comments on various planning assumptions, including land uses, regional housing issues, the need to provide greater funding for transit generally and for specific transportation network elements, and concern over potential risks associated with e-bikes and electric vehicle batteries.

SANDAG appreciates the feedback shared on land use, regional housing, potential transit investments, specific transportation network concerns, and e-bike and electric vehicle concerns as part of the Amendment public comment process. At the direction of the SANDAG Board of Directors, the Amendment is narrowly focused on removing the regional RUC while meeting state and federal requirements. The Amendment includes no other change to land use or to the transportation projects, programs, and policies identified in the 2021 Regional Plan. The 2025 Regional Plan is SANDAG's next major update of the region's long range transportation planning document and is separate from the Amendment to the 2021 Regional Plan. SANDAG will be holding multiple public outreach events throughout the County to ensure that interested members of the public can provide feedback on the development of the 2025 Regional Plan. There will be opportunities for the public to suggest changes to the adopted 2021 Regional Plan to address concerns that are outside the scope of the proposed Amendment.

Opposition to SANDAG

SANDAG received multiple comments expressing dislike for SANDAG generally as an agency, disapproval of the weighted vote, and dissatisfaction with SANDAG leadership. Other comments accused SANDAG of using the regional RUC specifically, and the regional planning process generally, to implement a United Nations-driven "globalist" agenda with the goal of restricting mobility, eliminating cars, and enslaving San Diego residents.

SANDAG is aware that there are multiple views in our community on the work SANDAG does and appreciates the public interest in providing feedback, regardless of whether it is supportive or critical.

SANDAG strives to optimize internal procedures with a goal of increased efficiency, transparency, and accuracy. These efforts have focused on our workforce (our people), along with the processes and technology used to complete agency work. SANDAG regularly undergoes required audits administered by our federal and state funding agencies. These audits are conducted in accordance with federal and state laws and often result in necessary process changes and improvements to ensure the agency meets our fiduciary responsibilities.

SANDAG's weighted voting process is the result of a state legislative reform under Assembly Bill (AB) 805, which was signed into law by Governor Jerry Brown in 2017. AB 805 modified SANDAG's weighted voting process for the 21-member board, which granted proportionally more votes for the most populated jurisdictions in the SANDAG region (California Legislative Information, 2017).

SANDAG does not act at the direction of the United Nations or the World Economic Forum or implement measures developed by these organizations. SANDAG, acting as both a metropolitan planning organization (MPO) and a council of governments, is required to comply with federal and state laws. Under federal law, SANDAG is mandated to develop and implement a long-range Regional Transportation Plan/Sustainable Communities Strategy

(RTP/SCS) every four years. That RTP/SCS process must be completed, including a demonstration that the RTP/SCS meets federal air quality standards and a federal social equity analysis, so that the San Diego region will remain eligible to receive federal transportation funding. Under state law, SANDAG is required to comply with Assembly Bill (AB) 805 and Senate Bill (SB) 375, both of which require RTP/SCSs to address GHG emissions reduction targets set by CARB and to include strategies that provide for mode shift to public transportation. The goal of the RTP/SCS is not to “price people out of their cars” or make it impossible for individuals to drive, it is to comply with state and federal requirements while also making our transportation system more convenient, safe, healthy, and equitable with various options for all users to travel to their destinations.

Public Outreach Efforts

SANDAG received comments requesting that meetings be scheduled at times when the public can attend. SANDAG appreciates the feedback received on the public outreach for the proposed Amendment. Several public meetings were held for the public to provide comments on the proposed Amendment. A public hearing was held on June 23, 2023, at 9:00 am during the Board meeting; Board meetings are regularly held on the 2nd and 4th Fridays of every month. The full year meeting schedule for the Board, Policy Advisory Committees, and Working Groups is published in advance on the SANDAG website. Committee meetings are recorded and published for public viewing on the SANDAG Meetings YouTube channel.

In addition, three virtual workshops were also held on July 18 at 12:30 pm, July 31 at 5:15 pm, and August 3 8:30 am. The virtual workshops were held via Zoom at different times of the day to accommodate the general public. Meeting-related resources including the presentation, meeting videos, and agenda are available to the public on the SANDAG website.

Revenues and Costs

SANDAG received comments related to the revenue estimates used to develop the proposed Amendment and implement transportation infrastructure throughout the region. Commentors expressed confusion over how the Amendment would fully implement the 2021 Regional Plan without regional RUC funds, and criticism of the explanation of revenues in the Amendment and the absence of updated project costs. SANDAG also received comments objecting to the cost to prepare the Amendment itself.

SANDAG appreciates the feedback shared on revenues and costs. The regional RUC was not intended to be implemented until 2030, and as such was only a revenue source for the final 20 years of the 2021 Regional Plan. The regional RUC was projected to generate \$14.2 billion in revenues between 2030 and 2050 under the 2021 Regional Plan and was anticipated to support transportation expenditures between 2030 and 2050, in combination with several other revenue sources. These regional RUC revenues have been excluded from the revenue projections in the Amendment.

In updating revenue assumptions for the proposed Amendment, adequate funding sources have been identified to implement the adopted 2021 Regional Plan without funding from a regional RUC. SANDAG included funding from the Infrastructure Investment and Jobs Act (IIJA, also known as the Bipartisan Infrastructure Law), which was signed into law in November 2021. The Infrastructure Investment and Jobs Act (IIJA) authorized \$1.2 trillion for transportation and infrastructure spending with \$550 billion of that figure going toward “new” investments and programs. The historic level of infrastructure investment from the

federal and state government in the early phase years of the 2021 Regional Plan was unknown and underestimated. The federal and state discretionary programs near-term estimates have been updated to assume the amount of federal and state dollars the region will receive for each local TransNet dollar based on prior years. The total estimate of near-term State and Federal Discretionary Programs resulting from IJJA is \$6.35 billion.

Additionally, SANDAG has already received \$650 million above what was anticipated between Fiscal Years 2021-2023 in the Amendment. The Amendment assumed \$950 million in discretionary funding revenue (\$507 million in state funding and \$441 million in federal funding) between Fiscal Years 2021-2023. During that same period SANDAG has received \$1.6 billion in discretionary funding revenue (\$876 million in state funding and \$766 million in federal funding).

Concern was expressed specifically over the assumptions for future New Starts/Small Starts projects. Those assumptions are based on SANDAG's historical success in receiving New Starts funding and on the pipeline of eligible projects over the 30-year planning period. Assumptions around New Starts/Small Starts projects were not revised in the Amendment.

Some commentors asked how SANDAG could be assured of funding for the 2021 Regional Plan and how projects would be prioritized for funding if there are funding shortfalls. Federal regulations require that SANDAG provide estimates of costs and revenues that are reasonably expected to be available, and may also include recommendations on new financing strategies and funding sources.¹ The revenue assumptions were updated to remove the regional RUC and because federal regulations require an amendment to reflect revenue sources that are subsequently removed or substantially reduced.² This also included the projected sales tax measure in the 2021 Regional Plan. These revenues were replaced by funding sources as described above.

Project prioritization under the Amendment remains unchanged from the 2021 Regional Plan. While funding shortfalls are not anticipated, it is worth noting that there will be more unknowns for revenues and costs in the outer years of the Regional Plan. SANDAG is typically required to update the Regional Plan every four years to account for the changes in funding outlooks, priorities, and planning assumptions, and will update priorities, costs, and revenues as part of the 2025 Regional Plan.

As to costs, these are reflected in 2020 and year of expenditure dollars in Attachment 1 to the Amendment: Errata to the 2021 Regional Plan. Generally, planning assumptions must be updated at least every five years according to FHWA Guidance for the Use of Latest Planning Assumptions in Transportation Conformity Determinations.³ Consistent with the transportation conformity rules and regulations, SANDAG consulted with federal agencies early in the Amendment development process, and the latest planning assumptions have been used for the Amendment. The cost information from the 2021 Regional Plan was the latest available at the time SANDAG began its transportation conformity analysis for the Amendment.

¹ 23 CFR 450.324(f)(11)

² 23 CFR 450.324(f)(11)(viii)

³ EPA420-B-08-901

Project prioritization under the Amendment remains unchanged from the 2021 Regional Plan. It is worth noting that there will be more unknowns for revenues and costs in the outer years of the Regional Plan. SANDAG is typically required to update the Regional Plan every four years to account for the changes in funding outlooks, priorities, and planning assumptions, and will update priorities, costs, and revenues as part of the 2025 Regional Plan.

Related to the cost of preparing the Amendment, itself, certain technical work requiring consultant support was necessary for the Supplemental Environmental Impact Report. However, much of the remaining work was completed with existing in-house staff and resources to minimize the net cost to prepare the Amendment.

Memorandum to the Board of Directors



7/13/2023

File Number: 3102008

Memo to: SANDAG Board of Directors
From: Hasan Ikhata, SANDAG Chief Executive Officer
Subject: Follow up from June 23 Meeting

On June 23, 2023, the SANDAG Board of Directors discussed the proposed Amendment to the 2021 Regional Plan. This memorandum is in response to several questions that arose during the meeting.

1. What can SANDAG take credit for to meet the CARB greenhouse gas (GHG) emission reductions target?

SANDAG can take credit for local and regional programs beyond State programs that reduce GHG emissions, such as development and implementation of regional transportation demand management programs (TDM), and regional EV charger and zero emission vehicle incentive programs.

SB 375 does not allow Metropolitan Planning Organizations (MPOs) to take credit for State programs that improve vehicle emissions standards, changes in fuel composition, and other State measures that reduce GHG emissions to demonstrate target achievement. (See [Government Code Section 65080\(b\)\(2\)\(iii\)](#)).

2. Is a reduction target set for vehicle miles traveled (VMT) as well as GHG, and what will be required under the CARB updated 2022 Scoping Plan?

There is currently no target for VMT reductions. SANDAG's current target, established in 2018, is a 19% reduction in per capita passenger vehicle GHG emissions relative to a 2005 baseline. Under SB 375, CARB is tasked to update the regional targets every eight years, with the option of revising them every four years. Under the current timeline, we expect CARB to set SANDAG's new target in 2026, which would apply to the 2029 Regional Plan.

On December 15, 2022, CARB approved its final [2022 Scoping Plan](#) for achieving carbon neutrality concluding that *"the pace of change to reduce VMT must be accelerated."* The Scoping Plan outlines a strategy that includes *"VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045."* However, the Scoping Plan does not set a regional target for VMT. (See 2022 Scoping Plan, p. 193).

How this will translate into future targets established by CARB for MPOs is uncertain at this time, but it is likely that a new VMT target and a higher GHG reduction target for MPOs will occur in the future.



3. How was the GHG emission reduction under the proposed Amendment determined, how does it compare to the 2021 Regional Plan, and where can the model that was used be found?

The GHG emission reductions under the proposed Amendment was determined using SANDAG’s activity-based model (ABM 2+) and the State’s Emission Factor (EMFAC) model. Detailed documentation describing the ABM2+ used in the 2021 Regional Plan is included as Appendix S of the 2021 Regional Plan and also publicly available at SANDAG’s GitHub repository and wiki site: github.com/SANDAG/ABM/wiki. The methodology was rigorously peer-reviewed and approved by CARB early in the development of the 2021 Regional Plan and the same methodology was used for the proposed Amendment.

As discussed in Section 2 of the proposed Amendment and the Introduction to Attachment A, Errata to the 2021 Regional Plan, the proposed Amendment was run on an updated ABM 2+ model which accounted for low traffic counts at some large employment sites, slight changes in employment and population distribution figures, changes to cross-border fleet mix, and more accurate traffic volumes on State Route 11.

The 2021 Regional Plan that was submitted in December 2021 had a 20.4% GHG per capita reduction from 2005. The proposed Amendment, which was based on the updated version of ABM 2+ and the removal of the regional road usage charge (RUC), results in a total reduction of 18.6%.

Comparison of SB 375 Results			
	2021 Regional Plan (ABM2+ with RUC)	2021 Regional Plan (Updated ABM2+ with RUC)	Proposed Amendment (Updated ABM2+ without RUC)
Population	3,620,349	3,620,349	3,620,349
SB 375 VMT	79,725,710	80,166,669	81,418,476
SB 375 VMT/Person	22.0	22.1	22.5
GHG Per Capita Reduction from 2005	-20.4%	-19.9%	-18.6
	Approved Plan	Due to ABM2+ Update	Due to Removal of Regional RUC
Difference in GHG per Capita Reduction from 2005 compared to adopted 2021 Regional Plan	0.0	0.5	1.3

4. Does the model consider number of cars and not just vehicle miles traveled (VMT)?

Yes. ABM2+ simulates people's travel behavior. In addition to VMT and mode share, it also tracks traffic volumes (i.e., passenger vehicle trips, and medium and heavy-duty trucks) on the roads through simulated travel. These numbers are not reported as part of the Regional Plan primary or supporting performance metrics but are made available through the SANDAG’s Transportation Forecast Information Center (TFIC) website after the adoption of the Regional Plan.

5. What are the amounts of the state and regional RUC assumed in the 2021 Regional Plan and what is the status of the state RUC?

There is no regional RUC in the proposed Amendment to the 2021 Regional Plan. The proposed Amendment assumes a state RUC of 0.7 cents (\$2020) starting in 2030 and increasing to 1.2 cents by 2050 to cover the funding gap created as fuel taxes diminish over time due to greater fuel efficiency and a shift to zero emission vehicles. The State has not released a start date; however, 2030 is consistent with the assumption made by other California MPOs.

California was first authorized to study a road charge pilot in 2014, which was ultimately funded through federal grant programs, to research the possibility of a state RUC as a sustainable and equitable gas tax replacement. More information on the status of this effort can be found here: [California Road Charge program](#).

6. Does the Amendment show Revenues in year of expenditure dollars?

Yes, Appendix V Table V-4 (p. 34) of the proposed Amendment [Errata](#) shows the changes in the Major Revenue sources in year of expenditure dollars.

Public Hearing Transcript

Chairwoman Nora Vargas:

Moving on to item number 16. This is a time and place set for public hearing on the draft amendment for the 2021 Regional Plan. Thank you to all the team that was here for all the other items. Appreciate that. So we're going to have a staff presentation that is going to be provided to all of us. And then we're going to have public comment. After public comment, we're going to hear comments from the Board. So if you have comments remember use your clicker, and then we're going to close the public hearing.

I want to just emphasize two things. This is the 2021 Regional Plan not the 2025 Regional Plan. There is no action to be taken today, and it's just an opportunity for us to be able to have comments and discussion to focus on the draft amendment in front of us. We're going to continue our conversation on workshops for the 2025 Regional Plan at our next board meeting. And then also a reminder for those of you who want to speak to submit your slips to the clerk of the board and raise your hand online before the end of the press staff presentation. And so with that I'll turn it over to Keith. Thank you.

Keith Greer:

Thank you, Chair, and good morning board. My name is Keith Greer. I'm one of the Regional Planning managers, and we have a very short presentation. So, last September, the board discussed options to remove the regional road user charge, otherwise known as the RUC, that would've gone in effect in 2030 from the '21 Regional Plan. The board selected option two, to prepare a focused amendment to the '21 Regional Plan without the regional road user charge and prepared a supplemental California Environmental Quality Act analysis.

As discussed at the board meeting, option two included the removal of the regional RUC, updated revenue assumptions resulting from the removal of the RUC, and other changes since the adoption of the '21 Regional Plan. And also, no changes to the transportation network, no changes in land use, and no changes to any of the programs, policies, or projects included in the Regional Plan itself.

The proposed amendment and supporting documents are completed and they've been posted to the SANDAG website for review. The amendment includes a 14-page narrative, in both English and Spanish, that describes removal of the road user charge and its effects on meeting our greenhouse gas targets, our revenues, our network transportation performance and transportation conformity.

Supporting documents and information includes a 37-page Errata, which shows in a knockout underlying all the changes that need to be made in the '21 Regional Plan to remove the regional road user charge, and updated 19-page social equity analysis, and a 52-page air quality conformity analysis. The amendment is available for public review through August 8th, as well as supporting materials.

Moving forward onto the greenhouse gas targets and what happens when you remove the regional road user charge. So, the Sustainable Communities and Climate Protection Act better known as SB 375, is a state law that requires CARB to set greenhouse gas reduction targets for each MPO. For SANDAG, as the MPO for this region, our carbon-established target as 19% reductions of GHG per capita as measured against the 2005 baseline.

The '21 Regional Plan exceeded that target and achieved a 20.4% reduction. The removal of the RUC results in an increase of 1.3 million vehicle miles traveled per day, and the amendment result in 18.6% reduction. So the Regional Plan was higher, the amendment is lower. But when rounded up per CARB's own guidelines, it meets the 19% reduction target. In addition to the reduction target, CARB will look at the policy commitments made in the plan itself.

SANDAG staff have been keeping our CARB contacts up to date on the status of the amendment it proceeds, and to date, we have heard nothing that indicates that the CARB will not approve the amendment as proposed. According to revenues, we have both reductions in revenues and also increases in revenues, coming from, since last time the point when Regional Plan was adopted. For reductions, the removal of the regional road usage charge will result in \$14.3 billion reduction in revenues.

In addition, local revenues from a sales tax measure envisioned to be occurring in 2023, in the Regional Plan, have been delayed to 2025. Increases includes TransNet. TransNet has been revised to reflect the board's own adopted April 22nd estimates, based upon higher than anticipated sales tax revenues. And the last two items are dealing with state and federal discretionary programs.

So since the adoption of the Regional Plan, there's been a tremendous increase in infrastructure funding coming out of Washington and Sacramento, coming from the infrastructure investment in Jobs Act or IJA and other state sources that were not known at the time that the Regional Plan was adopted. The net result of all these increases in reductions is a \$17.9 billion reductions in revenues for the amendment.

I should note that all these dollars are in 2020 dollars and are consistent with the '21 Regional Plan and reflect the revenues assumptions at the time the board direct us to move forward with the removal of the RUC. Revenues in the proposed plan would decrease by 7.9 billion, as I mentioned, to 165 billion. This is still sufficient to cover the 163 billion-dollar cost of projects and programs included in the Regional Plan as envisioned, with a \$2.4 billion buffer.

There are few other considerations to the board should consider. The amendment to Regional Plan would be consistent with the ozone budgets established for the regions. In addition, the amendment result in minor changes to network performance measures established in the '21 Regional Plan, with differences being less than 1%. The amendment would not result in a disparity impact or disproportionate effect on disadvantaged communities.

Finally, moving to the timelines and next steps. The amendment and supporting information has been released for public review, which will end on August 8th. A supplemental EIR will be released in July for a 45-day public review. In addition today's public hearing, staff will be hosting outreach events in July and August to get more feedback on the amendment and the supplemental EIR.

In September, the amendment and supplemental EIR will be revised based on comments received from the public and finalized for board consideration. All comments received will be addressed in writing and provided to the board, along with a final amendment and final supplemental EIR for your consideration. We'd hope to get back to the board in September, but the air quality modeling required for the supplemental EIR has taken longer. Based upon the number, timing, and complexity of the comments that we receive, it's estimated the final amendment and supplemental EIR will be brought back to the board business meeting in October.

If the board approves the amendment, it would be submitted to federal and state agencies for approval and the transportation conformity determination, and for CARB's approval, the Sustainable Communities Strategy. CARB's approval of the Sustainable Communities Strategy, which includes that 19% reduction target, takes several months to complete and may involve back-and-forth questions between the staff. That concludes staff's presentation. We'd be happy to answer any questions. Thank you.

Chairwoman Nora Vargas:

Thank you for your presentation. We're going to turn it over to Francesca for a public comment. Then I'll just remind my colleagues if you want to speak on this item, feel free to click your clicker I guess.

Francesca Webb, Clerk to the Board:

Thank you Chairwoman. We have a total of 12 public comments on this item. We'll start with Consuelo and then go to Mary Davis.

Mary Davis:

Thank... There is a... any roads charge... want to impose them elsewhere. Did you hear the first part or could I start again?

Speaker 5:

Start her time.

Mary Davis:

Can you start where-

Speaker 5:

Start her time.

Mary Davis:

Okay. Thank you, I'll start again. Mary Davis here. First, no to any road usage charge, road charge, mile tax, whatever you want to call it, no, no, no. And no to any tolls or new fees or charges. You're openly advocating to retire the State Route 125 South Bay Expressway toll early, yet hypocritically, want to impose them elsewhere. So no to that. And we reject most of all the paradigm shift that both SANDAG and the state of California are trying to implement.

Going from a public benefit model of funding our roads to infrastructure to a user pay system, which inevitably will involve telematics and tracking, regardless of whether the government does it or it goes to some third-party platform. At its very core, the concept of tracking people's movements is antithetical to both our national and our state constitutions, as well as the core American principles of individual autonomy and privacy. Thank you.

Francesca Webb, Clerk to the Board:

Our next speaker will be Alan C., who will be followed by Paul Henkin.

Alan C.:

Hello. Being a Navy guy, I always show up early. I was downstairs about 7:00 this morning. I saw your caterer holding the truck downstairs. Now imagine if she has to pay a road use tax. How much more would them pastries cost me as a taxpayer to serve you guys your free donuts? How much more would that taco shop I mentioned last... couple weeks ago, now is \$12 for a breakfast burrito. How well would his overhead be with the price of electricity, price everything else, price of gas, and now the delivery trucks to deliver the groceries, goods he needs to prepare that breakfast burrito.

No, the road use tax. And as he mentioned, you don't need the road use tax, it covers it. Now it meets your climate footprint, as the electric car takes over, that will meet your climate agenda, what do you want to call it, because nobody's going to take your empty bus. Just look out your window, empty bus, empty bus, empty bus. You put more empty bus, that idiot on the telephone said, "We need a bus every 10 minutes." How many more empty bus you going to put out there? What's the climate footprint of all them empty buses not transporting people, when my right to actually drive from my home to Costco, anywhere I need to go, I can do that. How many on board here took the bus? Nobody, huh? And yet, you're going to push buses? I yield back.

Francesca Webb, Clerk to the Board:

Our next speaker is Paul Henkin, who will be followed by Truth.

Paul Henkin:

This so-called amendment has no mandatory language, like add or delete. SANDAG is assuming it will get \$165 billion in federal money from the Infrastructure Investments and Jobs Act, signed into law in November, 2021 from page four there. It's hard... and it still has a few other revenue sources. Since the plan needs 163 billion, it doesn't seem to need any kind of VMT or RUC.

It looks like SANDAG has been playing with us since 2021, claiming it needs some kind of tax, road user charge, or VMT, another reason not to trust it. Then it plans to disrupt our schools to put this agenda, saying reach out to families through K to 12 school functions or tap into local high schools and colleges, universities to involve youth, either directly or through awarded-

Francesca Webb, Clerk to the Board:

Time has expired.

Paul Henkin:

... [inaudible] tax and programs.

Francesca Webb, Clerk to the Board:

Our next speaker is Truth.

Paul Henkin:

Disband SANDAG. And-

Francesca Webb, Clerk to the Board:

Your time has expired. After Truth will be Dr. Timothy Bilash.

Truth:

Oh. All right. The fact that it costs \$1.5 million just to amend this horrible Regional Plan is ridiculous. I demand a people's refund of the whole thing, especially since the 3.3 cents per mile road user charge was fraudulently suggested as necessary, but no matter what factor is used to tax people off the roads, whether it's hours traveled, distance traveled, per ride, or restricted vehicles, hours or zones, it's all to implement the totalitarian 15-minute city plan that just happens to be popping up all over the world at the same time.

Even this item says, "Percentage of residents that can access retail and parks within 15 minutes." And just as the World Economic Forum wrote in their Sustainable Road Transport and Pricing whitepaper, "As prices increase for road use, individuals will be forced to choose alternative paths or times, or walking and biking. Personal car usage and even public transport could quickly become for the elite few." And voting on charges with the vote center model corruption, forget compromising or voting. I just say no to all Regional Plans. Thank you.

Francesca Webb, Clerk to the Board:

Our next speaker is Dr. Timothy Bilash, who will be followed by Mark.

Dr. Timothy Bilash:

Good morning, Board. I will try to make this brief. I have two slides to share, if you could remote me. We're not doing enough. Kudos to the committee, to SANDAG for again taking the impossible and doing what was asked. But we're doing less, not more and what it was before is not enough, and so, I have two slides to share. To just to bring this, I'm a physician, OB-GYN, women's doctor, for 32 years, and a scientist. And I should do something?

Speaker 5:

Read his time.

Dr. Timothy Bilash:

Is my screen being shared? Yes. So a new paper, pulled it this morning. I'm sorry and this is the problem, the complexity of science, joint effect of ambient particle matter 2.5 micron exposure with vitamin B12 during pregnancy. And the slide I offer and I sent the link to the board this morning, shows a two to three times risk of diabetes in pregnancy when you combine particulate matter 2.5 with a vitamin B12 deficiency. Particulate matter comes from the tires in your car. You have to replace them every few years? Well, that goes into the air and that goes into our lungs and it goes into the babies. Thank you for listening.

Francesca Webb, Clerk to the Board:

Our next speaker will be Mark, who will be followed by Andres Wong.

Mark:

Mark. In this video, Katie explains what's happening in Oxford right now. Are they limiting people's movement? There's no excuse for limiting people's movement. It's literally a totalitarian gesture to enslave people. And when you've got people who are disarmed, like we are here in California, whose gun would be lucky to shoot accurately across the street at their neighbor's door, not that anyone would want to do that, and they can't travel freely, you can do anything to them, anything at all.

And they are in the UK. That's why the people revolted. You people need to see these videos. This is on BitChute. This one, you can just Google. Oxfordshire, and see on the city council's website what they're planning for you. Next, what they're doing there, right next to London. This is a worldwide movement. You need to see these videos. Rosa Corey is a Democrat. I'm not Democrat or Republican. Both sides screw us in different ways. They take turns. This one is about how they're replacing our government with unelected council-

Francesca Webb, Clerk to the Board:

Time has expired. Our next speaker is Andres Wong, who will be followed by The Original Dra.

Andres Wong:

Good morning. Thank you all for being here and thank you for this chance to hear my voice. I am from the supposedly beautiful city of Chula Vista and I speak now about the RUC, originally named mileage tax, because it is a tax. For the Union Tribune, earlier this week after the \$4.50 we pay at the pump, \$1.19 already goes to taxes and fees. We are already taxed to the hilt. I therefore ask all of you to remove and trash the RUC. This morning, there's obviously animosity towards all of you, please think why. I pray to our Lord Jesus that you listen to your constituents. Thank you.

Francesca Webb, Clerk to the Board:

And we're going to move on to Zoom where we have four remaining speakers. The first will be The Original Dra, followed by Carolina Martinez.

The Original Dra:

Amen brother. Yeah, so I love how you guys think that taking \$14.3 billion from the people that are already in dire straights could ever have been a good idea. You have to be brainwashed to believe that, because if you just divide that by the amount of people in the county, that's \$4,230 every year, which is \$353 extra a month. That's if every person had a car, which isn't true. So that means those would be astronomical charges to people that can't even afford to buy food, to live in a house, to do all the things that you guys are forcing them into.

This is so ridiculous. And then you want to spend 1.5 million to amend this? You guys act... Man, it's so sad. You never listen to the people. You're listening to these globalists and you're pushing this down the pipe, and it's all to push us into a 15-minute city. It's clear as day. If you cared about the people, you would look at that astronomical amount and be like, "Oh, my gosh, we can't do this to the people." You better never do it to the people.

Francesca Webb, Clerk to the Board:

Our next speaker will be Carolina Martinez, followed by Mike Bullock.

Carolina Martinez:

Good morning. My name is Carolina Martinez, with the Environmental Health Coalition. Thank you for the report and all the flexibility. We're here to request trainings for concepts like the road user charge for our community members in Barrio Logan, National City, and City Heights. To be able to understand these concepts, they're very complicated and we want to ensure misinformation is not used against them when making decisions.

I support residents in Barrio Logan, National City, and City Heights in understanding policies that are impacting their transportation. And I've conducted at least five different workshops on the road user charge. I explained to them that folks with less fuel-efficient vehicles are the ones that are paying the most when it comes to the gas tax. So we request that both SANDAG and the state dedicate capacity to support our community members in understanding this concept so that information is not used against them. Thank you.

Francesca Webb, Clerk to the Board:

Your time has expired. Our next speaker will be Mike Bullock, who will be followed by Blair Beekman.

Mike Bullock:

Yeah, thank you very much, Board, and thank you, Board, for all the work that you do. It is very unfortunate that we went down this path, because this road use charge was not going to take place until 2030. And of course, there's the 2025 Regional Transportation Plan, which you're working on right now. And the Regional Transportation Plan could get this right. And admittedly, it was not done right in the 2021 Regional Transportation Plan.

It should be obvious to all of us now that the state gasoline tax should be replaced by a means-based road use charge that does protect our privacy. And that can happen. That's one thing Democrats, Republicans agree on that we don't want to live in a police state. We respect our privacy and that can be done. I say that as a retired satellite systems engineer, Lockheed and-

Francesca Webb, Clerk to the Board:

Your time has expired. Our final speaker on this item will be Blair Beekman. You can go ahead.

Blair Beekman:

Hi, Blair Beekman here. To note that we, public comment, we are headed towards a future where there's going to be a lot of biometric technology used on our buses and I think we have to be ready for that with really open, accountable, clear policies and not be afraid to have those conversations openly. I mean, obviously, they're creating a lot of fear and angst and worry, and we need to learn how to be open in those conversations and it's open public policies that can allow that good conversation to take place and decisions to be made.

I also, with the ideas around many more buses, it's just an idea to increase ridership. Good luck how to do that. And I wanted to offer that the electric bus issue really looked to the VTA for ideas on the future of electric buses. And good luck on housing to really consider low-income housing development as a very viable option. Don't be afraid to talk about that either. Thank you.

Francesca Webb, Clerk to the Board:

Chair, that concludes the public comments on this item.

Chairwoman Nora Vargas:

Hey, thank you. We have a couple of members who have comments. I'm going to turn it over to Councilmember Shu.

Councilmember Jack Shu:

Thank you. Keith, I'd like to ask you a few questions first before I make my comments. Keith, you mentioned that this amendment will reduce our ability to reduce greenhouse gas emissions, from 20 to 18 point something, about almost 2%. What's the current CARB scoping plans targets with regards to reducing greenhouse gas emissions?

Keith Greer:

CARB hasn't set targets for MPOs yet, so the current target for SANDAG is 19%.

Councilmember Jack Shu:

You didn't answer my question. What is the current CARB scoping plan, just passed in November or December of last year, with regards to greenhouse gas reductions?

Keith Greer:

So there's two things happening here. The CARB scoping plan, which is a guidelines for how much overall state needs to reduce greenhouse gas, overall state, 25%. The current SANDAG target established by CARB is 19%.

Councilmember Jack Shu:

Isn't that 25% by 2030? Five years early?

Keith Greer:

25% by 2030. That's correct.

Councilmember Jack Shu:

Correct. Do you think the CARB will set a target for MPOs that is going to be higher or less than 19% in the future?

Keith Greer:

I do not have a crystal ball. The trend is going up. It's going to be harder to get our greenhouse gas targets at 19%. More likely it's going to go up from that.

Councilmember Jack Shu:

Can you say that again? Do you think it's going to go higher than 19% in the future?

Keith Greer:

All signs are it's going to go higher. It's going to be harder to reach your target.

Councilmember Jack Shu:

So, just to be clear, by passing this amendment, we're going in the opposite direction than what we might have in the future.

Keith Greer:

So, I think there's two ways to look at this. Right now, your target is 19%. Pursuant to the CARB's guidelines, you're meeting that target. You will have a choice as a board in the future, as part of the '25 plan and future Regional Plans, for how you choose to meet future targets. But for right now, you are meeting CARB's targets pursuant to their guidelines.

Councilmember Jack Shu:

Thank you. So, as most of you know on board, I've been against making this amendment to the '21 Regional Plan for a variety of reasons. There are many states, many regions of this country, and others, that have looked into road use charge. In fact, the state of California did with a pilot program which showed that people who use the road use charge found it much better than the current road use charge, which is a gas tax. 75% favored it.

We know the gas tax is regressive, that poor people pay more than rich people. So again, by putting this amendment forward, we're going against this body's own equity policies. SANDAG said we were going to try to deal with equity issues, because we know the poor suffered more, not only in terms of pollution, but also in terms of not having adequate transportation options. So, to me, it was just a complete quandary for me why we would want to do something to punish the poor because of misinformation that this body was working with.

And I get information from other sources. A conservative body that deals with tax issues, the American Tax Foundation, have looked into road use charge. They favor it. They think we should move towards it sooner rather than later. And lastly, another piece of misinformation that the public has been working with is that this body has the ability to impose a tax. We don't. We can't do that. Even if all of us unanimously voted to impose a tax, we don't. We put it before the people.

By placing this item on the plan, it gives the people of this region the option to impose, it means to raise funding for transportation with a road use tax, with a road use charge. So, to me, by taking this out of the plan, we're taking the ability of our constituents to decide for themselves whether or not they want a road use charge to fund adequate transportation.

Keith Greer:

Thank you.

Councilmember Jack Shu:

So again, it's very undemocratic and we're being dictatorial by taking that option away from the people to make that choice. And lastly, by amending this plan to go backwards with regards to reducing greenhouse gas emissions, we're giving this burden to the next board, the next generation to have to come up with a plan to reduce greenhouse gas emissions even more. 25% reduction per capita by 2030 is the new goal. Not 19%, not 20% with our last plan. That's the science, and that many of you have told me that you believe in climate change. Well, if you believe in climate change, you have to believe in climate science and climate math.

So, to me, voting for this amendment going forward is just contradictory to what we need to be doing here at SANDAG. These are hard numbers. I don't like them. I don't like the idea that our transportation system is inadequate. There are means to deal with privacy issues, there are means to make sure that a road use charge is means-based, and that people who rely on transportation are able to continue to use it and to provide other subsidies or means to help those who need help financially.

We do that with other utility bills, we do that with a number of means and it's able to do that. Privacy issues can also be dealt with. And I get this from other studies that I've read with regards to how this can work well. Hawaii, Oregon, Washington, Pennsylvania, other states throughout the country are looking into it. California certainly looking into it. We should have the ability to go forward and think forward. So I hope all of you take that into consideration as we go forward on this issue. Thank you.

Chairwoman Nora Vargas:

Thank you. Councilmember Burkholder.

Councilmember Melanie Burkholder:

Thank you, Chair. In light of my colleague's comments, Mr. Greer, on the slide, I think it's number seven, where it talks about the result in disparate impact, can you please explain to the board how you came to that conclusion that removing the charge would not result in that?

Keith Greer:

So as part of our-

Councilmember Melanie Burkholder:

And I'm sorry, and then I have one comment and I'm done.

Keith Greer:

Sorry about that. And as part of our Regional Plan, we have to do a social equity analysis. So when the amendment comes along, we do look at the amendment and we have that same social equity analysis updated. So that's part of your attachments to Errata. It's attachment one. It's posted online. And what they look at in social equity analysis is disadvantaged populations and the difference between disadvantaged populations for both benefits and things that are not benefits against the non-discriminatory population. So it's comparison analysis.

Zero would mean there's no difference. For the majority of the items under the amendment, there is no difference. It affects both the disadvantaged populations and the non-disadvantaged populations the same. Some are actually a benefit to them. So, for example, a road use charge is a cost. So for disadvantaged population, that cost is a greater burden than for non-disadvantaged populations. So in that case, it's a more of a benefit for them not to have that. So it's a social equity analysis, it's attachment to the Errata and it's publicly online.

Councilmember Melanie Burkholder:

Thank you for that. And completely off of that topic, Carlsbad is very interested in partnering with SANDAG in the flexible fleet program, and I'm just asking staff to accelerate that program. Thank you.

Chairwoman Nora Vargas:

Thank you. Councilmember Gaasterland.

Councilmember Terry Gaasterland:

Great, thank you very much. Keith, thank you for the presentation. Could you bring up slide four, please?

Keith Greer:

[inaudible].

Councilmember Terry Gaasterland:

Okay, I'm going to assume that it's up there, because I can't see it from here. Oh, there we are. Okay, so I always check the math and when... This corresponds to table, ugh, I'm sorry, table 4.2, I think, in our report. On table 4.2, we are given the numbers 22.1 and 22.5 as the VMT projected, in the old versus the new. What we're not given is, at least I couldn't find it, maybe it's there, is the VMT in 2005 that we are comparing to.

So I do the math, and I take these percents, 20.4, and that means that the 22.1 is 79.67% of X. Calculate X, take it to three decimals and do the same with the 22.5, which is really 22.489 and the 22.1 is really 22.143. So you get a different X. And if I use the old X, so 22.1, and that number, and then ask what's the difference with the new projection? The number I get is 18.9598. So it's actually really, really close to that 19%.

So I bring this up, because we really are talking about two tenths of a percentage point difference here and there. Your numbers that are in the table come to a different X. My point being, we're really concerned about this VMT reduction and yet the math doesn't add up.

Keith Greer:

So, first of all, let me thank you for going through that math. I couldn't follow all of it, but we do have a program here where we do check our math and have a QA/QC process. It's part of our peer review process that Dr. Burke's in charge of. I can say that both the numbers shown up here are consistent with the report and there's also shown in the Errata. And Dr. Burke, would you like to add, adjust anything else?

Dr. Burke:

We do have Wu San online. He was unable to be here today. Wu, he was promoted panelist, if you want to explain anything quickly?

Dr. Wu Sun:

Sure. Can you hear me and see me okay?

Dr. Burke:

Yes we can. Thank you.

Dr. Wu Sun:

So I have to say there are a lot of numbers there. I don't follow hundred percent, but in terms of the to each difference, with and without RUC, is roughly 1.8. It's combination of the mode share change, which represented drive behavior change. So for example, driving alone for work trip increased by 0.3%, and also because driving is cheaper, the average trip events increase by 1% overall. So that's the combination of these two factors.

Councilmember Terry Gaasterland:

Okay. So I would urge all of us to really ask for accurate numbers. Precision to three decimal points isn't necessarily necessary, but I get 19% if I ignore the decimal points, and I'm going to tell you how I get it. 22.1 is the VMT number in the old. 22.5 is the VMT number in the amendment. If we take 22.1 and divide by 79.6%, we get the 2005 number, presumably. If we take 22.5 and divide by 81.46%, 0.4%, we get a different number. So that means that we're off a little bit. And my calculation of the off a little bit is 2/10 thousandths of a percentage point away from 19%. So I think by rounding, you're doing the calculation a slight disservice, that this is actually very, very, very close, a whisper close to 19%.

Dr. Burke:

If it would be acceptable, we'd be happy to follow up with you after this meeting to explain. We've done this consistently throughout, and we definitely want to do this to be compliant with CARB. So we'll definitely make sure that we can work through the numbers with you to explain how we've gotten there and we can return back to the board to let them know how that's worked out.

Councilmember Terry Gaasterland:

Yeah, that's good. That's fine.

Chairwoman Nora Vargas:

Thank you. The next person is Councilmember Duncan?

Councilmember John Duncan:

Thank you. I think my questions were answered by the other director's questions. The part of the point, though, is this, it's modeling, right? And all models are somewhat imperfect. We try to make them as perfect as possible, but I just wanted clarification. It seems to me that the two main factors that are going into the models that would lead to the conclusion of the greenhouse gas increase or not as much reduction are one, that the road user charge would have a suppressive effect on driving due to its cost, due to the increased cost.

And the other aspect appears to be that it may slow down some other mass transit or other projects that might lessen the desire to drive. I am interested in how heavily each of those factors weighed in the calculation. I know this may be too simplistic, but if you have any comments on that that may help me more, that would be great, but I appreciate the comments you've already made as well.

Keith Greer:

Just really quickly, I think Dr. Sun online explained it. So when you take out the road usage charge, it makes it cheaper to drive so people drive more and then drive further. And so, that's simplistically how it works.

Councilmember John Duncan:

Right. And that's what I just said. My question, I guess would be a little bit more specific, and if we don't have it right now, that's fine, would be the percentage impacts of those. I mean, if based on what you just said, if the change in the calculation for greenhouse gas reduction target would be based, based on what you just said, I believe 100% on the fact that there would be more driving, because it's not going to be increased the cost of it. But I think it was more complex also. It actually also included the other factor that I mentioned. I can look into it deeply separately. Thank you.

Chairwoman Nora Vargas:

Thank you, Mayor Jones?

Mayor Rebecca Jones:

Thank you, Chair. Okay, so I had a couple of comments and then a couple of questions. So, I have a little bit of heartburn about the \$1.5 million that we are spending on this, only because eight of the original cities that voted on this were my city, Carlsbad, Coronado, El Cajon, Oceanside, Poway, Santee, and Vista. We originally voted no, because we did know about the, how close the reduction was, enough to almost meet the goal and round up.

Many of the board members that were on at the time have actually said, "Oh, the RUC is already out of the plan." It's not, and we have found today that it's moving forward. October, we should have board approval and then moving forward to submit to CARB. That would happen in November. So again, still not taken out, not out of it. But I do have some questions. And oh, one other thing, the road user charge does not pay or is not in lieu of the actual gas tax, it's on top of the gas tax. It does not replace it.

So the metrics, I did ask a question on Wednesday. I did get a response last night. The ABM travel demand, I'm not going to go through all of that right now today, but can I have that sent to me where that's located, because I haven't been able to locate that. You don't have to do that right now, but I would like to talk about... Oh-

Chairwoman Nora Vargas:

We'll send it to everybody so everybody has a copy of it.

Mayor Rebecca Jones:

Perfect. On page 188, we're talking about the revenue assumptions and we still talk about them in 2020 dollars. Which again, I have a little bit of an issue with that, because we do have the year of expenditure numbers. The item number one, which is the removal of the road user charge is 14.2 billion over the life of the '21 plan. However, the year of expenditure is 24.47 billion, which is quite a bit of a difference. It's 10 billion more. I would like for us to start talking in the dollars and year of expenditure, because that's actually more of what we actually will be paying.

And then also, I do have this question on number three of that same revenue assumptions. The update in the TransNet, we're figuring that'll be about two billion more, and I don't think that we actually voted on reallocating the TransNet dollars from what our residents have actually agreed to pay for. So if I missed that and somehow we voted on that and I didn't realize that, I would like to know. And if not, when are we planning on actually moving forward with the reallocation of TransNet dollars to the new Regional Plan?

CEO Hasan Ihkrata:

Let me, if I may answer the question of the mayor. The TransNet allocation is totally different from this amendment. This amendment is based on a request by this board to remove the RUC from the plan and we're doing that. I said many times before, and I'm going to say it again to you, that the TransNet money right now in the account is enough to pay the debt. There is no additional TransNet money to reallocate. We could BS you until, "Yeah, we'll do that, we'll bring..." But between now and 2030, more than 85% of the TransNet money is going in paying the debt we borrowed to build the project.

So Mayor, with all due respect, when you say reallocate, you have to have money to reallocate. There is no money in the TransNet, at least between now and 2030, and that's a different process than the amendment. This board requested to remove the road user charge from the plan. We did it. We're going to release it for public review as the modeler said, it's 18.6 rounded to 19%, and we'll let the state decide how to do about that, to go about approving it or not approving it. But I just want to make sure we're clear. There is nothing to reallocate and the fact that somebody at one point told you we have all this money, it's double what's actually is, I'm sorry. I apologize that you are under the impression that TransNet has more money than it actually does.

Mayor Rebecca Jones:

I'm sorry Mr. Ihkrata, so you're saying between now and 2030, but this is a... this would happen in 2030 anyway.

CEO Hasan Ihkrata:

Correct.

Mayor Rebecca Jones:

So you said 85% of TransNet would go toward debt service, so there was-

CEO Hasan Ihkrata:

Yes.

Mayor Rebecca Jones:

... there's still 15%-

CEO Hasan Ihkrata:

Correct.

Mayor Rebecca Jones:

... at some point. Yeah.

CEO Hasan Ihkrata:

Yeah.

Mayor Rebecca Jones:

So the 15% we have not voted on reallocating that, correct?

CEO Hasan Ihkrata:

You did not prepare-

Mayor Rebecca Jones:

And the reason... Sorry, the reason I bring this up is because it's right here in the revenue assumptions on page 188 that we are counting TransNet dollars.

CEO Hasan Ihkrata:

Sure.

Mayor Rebecca Jones:

That's why I bring it up.

CEO Hasan Ihkrata:

Yeah. And the 15% has been allocated many times over to match the grant we're getting. So the bottom line is there is no money to reallocate. That's the honest answer. Now, if you want to go about debating why and how, that's fine.

Mayor Rebecca Jones:

No. No, I'm sorry. Maybe I'm not understanding, because we are counting income from TransNet to actually pay for this plan, which also bases on-

Chairwoman Nora Vargas:

[inaudible]

Mayor Rebecca Jones:

Okay.

Keith Greer:

We also have a chief financial officer here, but there's two things going on here. This is not about reallocation. The number in here is about an estimate in the future of what TransNet would bring in and it's updating that estimate based upon the board's own adopted 2022 estimate.

Mayor Rebecca Jones:

But if it's a revenue assumption to pay for the '21 plan, then it is being used for the '21 plan.

Keith Greer:

That same revenue assumption was built in the '21 plan, nothing's changed. All that's changed is the amount of the estimate in the future, based upon higher than anticipated sales tax.

Mayor Rebecca Jones:

Okay, but the TransNet was actually, sorry... Maybe I'm splitting hairs, but I want to understand this. I'm trying to get at it. I'm sure I'm probably not the only one. So when we're looking at TransNet, it was to pay for certain improvements, and what I'm trying to figure out is if it's paying for the new plan, where are those dollars actually going that are specific to the actual original plan? I'm sorry, the '21 plan?

Keith Greer:

Maybe Andre would be more helpful in this.

Coleen Clementson:

I can add something here, if I may.

Mayor Rebecca Jones:

Yeah.

Coleen Clementson:

So, remember that having a revenue scenario is a federal requirement to get this plan approved. And so, what we have to do is show the federal government that this is a possible way to pay for this plan. The only thing that's been done here is we've looked at the revenues and that was based on the board input. How much more do we think we're going to get from state and federal grants because there's a tremendous amount of money out there that we didn't anticipate? So we upped that piece.

Then we also looked at our latest revenue assumptions for TransNet and we built that up as well. That's what made up for the \$14 billion shortfall once you take the road usage charge out. The critical thing here is that that additional revenue is not attributed to any particular project. It's really just getting that math problem right so we can take this amended plan and give it to the federal government and ask them to approve it so that we can continue to get federal funding. So that's how it's done.

It's not that this 1.2 billion is going to this project or that project. It's overall to meet that hole in the plan that comes as a result of pulling out the road usage charge, and-

Mayor Rebecca Jones:

Thank you, Coleen.

Coleen Clementson:

... that's all there is to it.

Mayor Rebecca Jones:

Yeah, I think you're understanding what I'm asking.

Coleen Clementson:

Yes.

Mayor Rebecca Jones:

So we haven't actually allocated it, but we're using it as an assumption that we will reallocate it at some point in time and it will be used for the new plan. Great, thank you for that clarification. I'm sorry to be splitting hairs. I'm really not trying to waste our time. I just want to understand it completely. Thank you.

Chairwoman Nora Vargas:

All right, Mayor? Deputy Mayor Goble?

Deputy Mayor Steve Goble:

Thank you, Chair. I think the public might be a little confused why we're making revisions to a historical document rather than modifying a future document. Can you help me understand that?

Chairwoman Nora Vargas:

Go ahead.

Coleen Clementson:

Certainly. So these plans are required to be updated every four years. That's a federal law and a state law. So the most recent plan that the board of directors approved was in December of 2021. Your next plan, the 2025 plan is due in the fall of 2025 to the state and federal agencies. What the board had asked staff to do as, a result of a lot of public input, take that road usage charge out of the 2021 plan. That's what's before you today is a proposed amendment to the plan that the board adopted in December of 2021. We recognize that some of your discussion here is important for the 2025 plan and we've got a full workshop planned for you all on funding for the 2025 plan coming up.

Deputy Mayor Steve Goble:

Great. Thank you.

Coleen Clementson:

Thank you for the question, because I know that can be really confusing for the public, too.

Deputy Mayor Steve Goble:

Thank you. My next question has to do with the 19% reduction by 2035. Does that include the benefit of conversion from gas to electric cars? CARB says that we will have 2.9 million less gas engines sold by 2030 and 9.5 million less gas engines sold by 2035, implying they'll be electric by then. Does the 19% reduction include the benefit of that conversion from gas to electric?

Keith Greer:

So the number that CARB gives us, it's against the 2005 baseline and it's very specific what we can count and not count, and it's already built into the model, including things like fleet turnover, which is what you're getting at. So the number we've given you, that 18.6, has all the built-in assumptions as we know right now already built into it.

Deputy Mayor Steve Goble:

So it's, answer sounds like yes-

Keith Greer:

Does include.

Deputy Mayor Steve Goble:

... it does include the conversion, gas to electric, is what you're saying.

Keith Greer:

Correct.

Deputy Mayor Steve Goble:

I understand. Okay, thank you. My point-

Coleen Clementson:

I think one clarifying point there. So the laws that we have to comply with and the math problem that we have to use to get to that 19%, the law doesn't allow us to count electric vehicles, unless it goes above and beyond what the state is already expecting this region to accomplish. So the measurement that we have to use looks at vehicle miles traveled per person, how long the trips are, how many trips I take on an annual basis. That's what we have to use and that's the proxy to get to this greenhouse gas reduction. I know it's super complicated and in the weeds, but that's the law that the state has for us and for everybody in the state of California to have to meet. So even if every vehicle today was electric, we wouldn't see a big increase there. So that, I just wanted to clarify that point in the law that makes this really complicated.

Deputy Mayor Steve Goble:

If you said every car today was electric, we wouldn't beat the 19%?

Coleen Clementson:

We still would have to meet our vehicle miles traveled. So it doesn't... the vehicle miles traveled, you may still drive even if your car is electric. So we're all accumulating miles, you may actually drive more.

Deputy Mayor Steve Goble:

So, it's really more about miles driven than-

Coleen Clementson:

That's the math problem that we have-

Deputy Mayor Steve Goble:

... GHG reduction is what I'm hearing you say.

Coleen Clementson:

That's true.

Deputy Mayor Steve Goble:

So really-

Coleen Clementson:

That's the math problem.

Deputy Mayor Steve Goble:

Really, this is about getting-

Chairwoman Nora Vargas:

Excuse me, hold on one second.

Deputy Mayor Steve Goble:

... out of CARB rather than what kind of car we're driving?

Chairwoman Nora Vargas:

Can you hold on one second? Give me a second. The members of the audience, can you please refrain from making any comments or clapping or anything? That we need to have this discussion as a board, so we ask that you are respectful of our time. Go ahead, sir.

Deputy Mayor Steve Goble:

So am I right in hearing you saying it's less about the kind of car we're driving gas for electric and more about the number of miles that we're driving?

Chairwoman Nora Vargas:

I think the important thing to mention here is that there's rules and formulas and regulations that the state has directed us. And so it's not necessarily what she's saying or what we're saying, it is the regulations that we have to follow. And so that's where the math is where it's at, but happy to have a conversation in terms of some of the laws.

If you remember when we did the Regional Plan for 2025, we had a whole briefing about what were the factors that we had to take in place so that we as we're trying to reach our goals, that we really understood what those were. I think we can go back and check so that everybody understands for the 2021 plan what those were in case you have any specific questions on that.

Deputy Mayor Steve Goble:

Yeah, I think the public would say what's really driving the 19%, the conversion to electric or fewer miles traveled?

CEO Hasan Ihkrata:

Vehicles miles traveled.

Deputy Mayor Steve Goble:

That's what the public would ask. Yeah, yeah.

CEO Hasan Ihkrata:

Vehicles miles traveled.

Chairwoman Nora Vargas:

Mm-hmm.

Deputy Mayor Steve Goble:

My final question, we took out the 3.30 cent road user charge from the regional charge. Page three of the staff report says separate from the regional RUC, the 2021 Regional Plan also assumes revenues resulting from the state administered RUC. What's the amount per mile of that and how much is in the plan, in terms of billions of dollars?

Keith Greer:

Let's get back to you on that. We might have an answer online in one second. The actual state charge. I do not know it right now.

Deputy Mayor Steve Goble:

It would have been 3.30 cents, plus the state charge, is what the staff report is implying. And I'm trying to find out 3.30 cents plus 4 cents? And since we took out 14 billion, it assumes there are several billion still in there from state RUC. I'm trying to figure that out, too.

Keith Greer:

You're precise that this removes the regional road usage charge. It doesn't affect anything the state's doing. We're trying to get that number for you, but this does not affect the state's regional road usage charge.

Deputy Mayor Steve Goble:

I understand. I think a public would say, "What's the total nut we're trying to crack?"

Chairwoman Nora Vargas:

We can get that number for you. We can get that number for you. And I think it's important and the good news is that that's why we're here today to have a discussion and to be able to address any questions that you have. And you have to remember there are things that we can do based on our jurisdiction and then there are other things that we must comply with because of the state. And if there's anything that we need to change with the state, I think is

working directly with our state legislators to be able to modify some of that. Any other questions, sir? All right, Mayor Minto.

Mayor John Minto:

All right, this is kind of interesting. I'm hearing about all these numbers and everything, and you mentioned the, complying with the state of California. And bottom line is, we're also trying and comply with the federal law, and so it's all getting passed down to all the jurisdictions to make us the bad guy. I guess what we're really talking about is this concept of climate change and the reduction of our greenhouse emissions by 19%, and that's an attempt to help reduce the rise in temperature, not just in San Diego County but the state and maybe across the world.

So, if we were actually to implement this road user tax, I see what the number is for money, but how many cars would it actually take off the streets? I don't know if you have this information today, but you can get it to us. I think that's important, because it goes to what Deputy Mayor Goble was saying, is it's really not about just about getting cars off the street, doesn't matter what they are. So then, to one end, do we know what the temperature change would be in milestone years?

For instance in 2030, '35, '40, maybe even 2050, are we talking about reducing the rise in temperature? Are we talking about there would be a lowering of a temperature worldwide, or would there be no change, which means we just stay where we're at today? And even if it went up 1% in temperature change, what's the real effect of that worldwide and how is it that we are, by what we're doing here in San Diego County changing the world? Because I can tell you right now, in my opinion, we're not changing the world with what we're doing here.

Some will say, "But it's a start." Yeah, well, you know what? I can't afford to pay more for driving, like a lot of people. I'm retired. I'm on a fixed income now. Always wanted to say that. So I don't know if you have any of those answers. I doubt it, because we're too busy. Everybody's too busy talking about reducing the greenhouse gas effects and preventing the worldwide temperature rise, but nobody seems to know what that worldwide temperature rise will be in 40 years even, or 20 years even. And so, I don't know, I guess the question is how can you justify, how can we justify it? How can the state justify it or the federal government justify it if they don't know the answer? So I just thought I'd throw that out for fun, if nothing else.

Chairwoman Nora Vargas:

All right, thank you. Councilmember Shu.

Councilmember Jack Shu:

Sure I have a... Well, let me address what Council... I mean, Mayor Minto's thing real quick, and have a question for Mayor Jones. We're going to have breakfast about this Minto and I, but that's similar to someone that would say, "I shouldn't pay any-"

Chairwoman Nora Vargas:

Give me one second. It's not a Q&A. This is a board discussion. And in board discussion members are able to have conversations with each other. That's what this process is all about. So no, it's not a Q&A, it's, a comment was made by one of my colleagues. My other

colleague was already in the queue and so I gave him the power to be able to ask anything he can. He can ask anybody in this room any questions that he has. So just for clarification.

Councilmember Jack Shu:

So Mayor Minto, when that issue was brought up to me by another elected person, I say, "Well, that's like the federal government's already what, three, \$4 trillion in debt, how much is my little income tax to the federal government's going to make?" Wouldn't make any difference at all. Maybe I don't have to pay any taxes at all. Anyway, we'll leave that for our breakfast discussion. But Mayor Jones, you had mentioned that the road use charge would be in addition to the gas tax, not a replacement of the gas tax. I'm just wondering where did you get that from?

Mayor Rebecca Jones:

Councilmember Shu, right in the document, the funding document, it has the gas tax still in there, and then it also has the road user charge as not being able to be used for any road fixing or anything like that. It's on page V4 of the appendix, if you'd like to read that. Thank you.

Councilmember Jack Shu:

Sure.

Mayor Rebecca Jones:

And if you'd like to meet for coffee, I'd be happy to do that-

Councilmember Jack Shu:

I'd love it. I'll love it.

Mayor Rebecca Jones:

... anytime so we don't waste our board's time. Thank you.

Councilmember Jack Shu:

Thank you. That's really news to me, because all the documents I've read and information from the state and the other states, the road use charge is to replace the gas tax, which they believe is getting obsolete. We've had it for a hundred years and it's obsolete in the sense that I know you drive electric vehicle so you know your \$200 per registration fee, per year is a fraction of what others are paying with the gas tax. So-

Mayor Rebecca Jones:

Page V4 Councilmember.

Councilmember Jack Shu:

Coffee's on me. I'll look forward to that. Thank you.

Chairwoman Nora Vargas:

Thank you. Councilmember Melendez.

Councilmember Katie Melendez:

Thank you. Great discussion, everyone. And I'm glad that we're at this point where we're looking at alternatives to our previous plan, but regardless of a discussion around a regional road usage charge, the state RUC is coming, and from my understanding, we have yet to be given a confident timeline of when the gas tax will be abolished. It has become less profitable of a revenue stream over the past several decades as cars have become more fuel efficient.

And now with the change to laws with the sale of internal combustion vehicles, we know that it will be essentially obsolete, but we haven't been given a confident timeline from the state. And I really believe that we need to, in addition to our planning regionally, we need to put ourselves in a position of education and advocacy, and has this body taken a position of legislative advocacy to abolish the gas tax?

In the City of Vista, I brought forward a resolution to insist on just that and I really believe that for the benefit of the public and for the working people that are going to continue to use gas-powered vehicles, because that is all that they can afford, I want to have full confidence for them that at no point will members of the public be suffering from a doubles taxation. And I really believe we need to put ourselves in a position of legislative advocacy, regardless of a state or regional road usage charge. We have to have a clear definition of when the gas tax is going to be abolished.

Keith Greer:

Thank you. Deputy Mayor Molina?

Deputy Mayor Luz Molina:

Yes, thank you, Chair Vargas. I would like to expand on Councilmember Melendez's comments. And absolutely, I completely understand the confusion that is out there, the facts and the other facts that the public seems to be catching. Of course, these are extremely complicated figures and methods and mechanisms by how we arrived at these figures. I would like to call for SANDAG to provide us board members, so that we can then disseminate the information to our, the people that we represent, in a way that is understandable.

Regarding the road usage charge that is coming from the state, this would not be the one that SANDAG or whoever's going to go and put on a voter ballot, right? That's completely different. There's one from the state that's coming. The one here from SANDAG or for the regional transportation plan is getting taken off 2021. What does that mean? People are still going to see a road usage charge from the state of California? I mean, there's a lot that needs to be explained clearly.

And I would like to request a way for me to explain that information to the people that come and ask me, "Is the road usage charge going to be on top of the gas tax?" Here, we're hearing... At this table, we're hearing two different things. So what is it? I need to know that information so that I can explain it to the people that I'm speaking with. Thank you.

CEO Hasan Ikhata:

Hi, Mayor, Chairwoman. I think the councilwoman from National City is asking a great question and we are now getting into this philosophical discussion of it's a VMT or it's a greenhouse gas emission. Is it the temperature rising or falling? That's beside the point. We're a transportation agency. We have a state law and a federal law. The state law said that you have to meet certain targets. Don't ask us why this target, whether it's logical. We didn't

set those targets. If you want to change those target, like the chairwoman alluded to, talk to the legislators and change the law.

I think Councilmember Fisher was saying last time in the workshop, "Let's change the law." Change the law. But the law is this, in the regional transportation plan, and by the way, in every regional transportation plan in the state, there is the statewide assumption and that is either a gas tax or a replacement of the gas tax. We have nothing to do with that. That's a statewide assumption. On top of that, we assumed a road user charge. I think it's about two cents per mile and the board ask us to remove it and that's what we're doing. So let's not complicate these issues and make it philosophical discussion.

It's very simple, this board directed staff to take the road user charge on top of the statewide, which we have nothing to do with, out. We're taking it out. We're resubmitting the plan to the state. It's up to the state whether they're going to approve it or not, but we're following your direction. And look, you all smart people, but this is definitely beyond my pay scale to start solving the modeling problem here that require few PhDs that doing it right now, like Dr. Wu, to solve.

But this discussion is really about following your direction and taking the road user charge out and putting this for public review. There is no other discussion that been taken. There is no changes to the plan. We are following your direction and removing the road user charge. The statewide charge, we have nothing to do with it. And every plan in the state, San Francisco, Los Angeles, Sacramento, all the 18 MPOs have that statewide assumption. Now, the state now is doing a pilot to replace the gas tax with a different user charge. We don't know the result of that and we don't control it either, and I hope that answered your question.

Chairwoman Nora Vargas:

Yeah. But I do believe, Vice Mayor, that your request is not one that I don't know that necessarily is where you stand on the issue. What's you're asking is for a document with the facts. And I know that that's handy, because we have used the facts to have these conversations over and over again. I think there's absolutely an opportunity and that's why this discussion is so important. There are people who have very different perspectives and that's why we all run for office with our different perspectives, and our constituents elected into office and we all are sitting here having the discussion.

And there are going to be clear philosophical reasons of how we get to one place or another. Some of us may be leaning one way or another and that's okay. That's what this body is supposed to be doing. And in the retreat, all of you asked for opportunities to have further deep dives on some of these issues and that's what we're doing here today. It's taking this long because it's a process we have to follow. Because part of our responsibility and our job is to ensure that there is opportunities for public comment, et cetera, et cetera.

I know that it's been said, it has been since last December where the recommendation was done to take the road user charge out of this plan. I was on TV announcing that we were going to take it out. And then there was assumptions made that I said, "Oh, I'm taking it out." No, this is not the nor show. I never said that I was going to take it out. What I said is that that's the direction that the board gave us and that's the direction that we're going to be going under my leadership as chair, and that's what we're doing right now.

Could it happen faster? I wish government worked faster, I really do, every day of my life. And I've been a public servant for a couple of years now. It doesn't work that fast. But I think to

your point, it is extremely important that if it takes us longer to have these conversations, because if you have questions and you have access to all this data every day, imagine what the public is asking for. So, to respond to you, we will make sure that we have some sort of, I know that we have it already, because I've seen them, and we'll get that to you so that you can share with your colleagues and we'll get it to everyone else. All right, Councilmember?

Councilmember Andrea Cardenas:

Yeah. So first of all, I think the discussion is really great. I think part of what we're seeing right now, though, is there's two separate things that we're trying to get at. One of them being the item at hand, which is looking at the amendment that was requested from this board for something a previous board did. There are things that are just what we need to do to be in compliance, and please correct me at any point if I'm wrong, with both state and federal law, and that's the way that we must govern.

There is also a lot of discussion, though, on how we feel about those things and that's perfectly okay for us to have a conversation on. However, I genuinely believe that that's a conversation we must be having when we're talking about our legislative priorities and the things that we would like to change about the way that we must govern or we want to operate in here. I'm hearing, of course, it's not ideal that we're not taking into consideration several assumptions and whatnot, but we still have a formula that we need to input the data in that's going to give us the result, and that's the formula that's been handed to us.

That's a card that's been handed to us as what we must do until we are able to, either decide as a board we want to advocate as an agency to our state, federal legislators, that's perfectly fine. I just think that we're getting all of these things convoluted and that's why it gets so muddled in this conversation. They're two completely different conversations to have. One is, are we doing what we must do, per accordance with what our board is here to do? And the other is what do we want to see changed, right?

And I think we've had those conversations both at the retreat and in some of our workshops about, well, we just don't like that we have to do these things or we don't think that it's conducive to the work that we do in our region. And that's fair, but we must take that conversation on the action of what we can do about that policy rather than the overall of our philosophical or our ideas.

I do think we can be a stronger advocacy agency for the things that we believe don't work for our region. Because the reality is, our region is very unique in a lot of ways. We have not only the border but just, we are a very specific region that the needs that we have are different than other parts of the state or the country. And so, I just would like for us to, although I think this conversation is very great and fruitful, we must be able to differentiate that as we're moving forward, because if not, we get caught up in the, "Well, who's making us do this and why?"

And we need to be able to separate that in order for us to have some conclusion when we're trying to get, not just getting through the meeting, because of course, we want to hear what we all are thinking and what the public has to say, but that's when it gets also very confusing for the public, in my opinion, because there is that we're not differentiating between the legislative and policies that we would like to see changed and what we need to do as a board. And so, I just think that there is a lot of great conversation here. We just need to be able to direct it in an element where it makes sense.

Chairwoman Nora Vargas:

Mayor Kranz.

Mayor Tony Kranz:

Yes, thank you. I would point out that Mr. Irkhata's comments about this being a philosophical discussion. In reality what it is, writ large, is a political conversation and there's no question that for the last couple of years, this issue has been used as a tool to bludgeon this agency. And so, while the chair talks about government not being very fast, I'm reminded of the term government in action and depending on how you say that, I'm inclined to use the term inaction, because it has taken entirely too long to get to the point where we're able to consider this in a serious way. So I'm thankful that we're at that point.

I would also like to point out that we have a road usage charge. It is a gas tax that is as inequitable as you could possibly get. I office from home, I ride my bike to city hall. Unfortunately, I don't have a transportation system that allows me to come to these meetings by public transit or I would gladly do that. My son, a tradesman, works throughout the state, pays crazy money to drive his truck in order to transport his tools.

He recently had the opportunity with the company that he works with to get a company vehicle, with a company gas credit card, and it was like a huge pay increase for him. So while we have these conversations about the best way to pay for improvements to our transportation system, whether that's public transit, modes of public transit, modes of people getting from where they need to be to back home, et cetera, I think it is important that we remember that the impacts that these decisions have on the common man are pretty important. So I look forward to putting this to rest in the 2021 plan and actually relish the opportunity to have this conversation again with the 2025 plan.

Chairwoman Nora Vargas:

Thank you. Mayor Vasquez?

Mayor Racquel Vasquez:

I will make my comments very short and I hope sweet. I support a fact sheet regarding what a road use charge is, but also clarifying the difference between the state road use charge and SANDAG. I think that that would help to inform real people about what's going on here, and I think that would help to shore up what the future of transportation allocations of funding will look like.

Secondly, I'd like to say, wow, this is 2021. I'm really looking forward to working on the future Regional Plan and I am pleased to see that outlined in the key considerations that budgetary question, that budgetary shortfall has been met with the adjustments that are currently recommended in item number 16. So fact sheet number one regarding, and I'm talking about a one-page fact sheet, a nice and simple, provided to us that can be updated. And when updated, notifying us to let us know when it is updated, but also a one-page fact sheet regarding the upcoming Regional Plan. Thank you.

Chairwoman Nora Vargas:

Thank you, Mayor Vasquez. Mayor Jones?

Mayor Rebecca Jones:

Thank you so much, Chair. So we do have a fact sheet, though it's 26 pages, which is the funding for the Regional Plan. And it actually has out there, and actually, you had brought this up, Vice Mayor Molina. On V23, it has two billion dollars that is going to be... It's called city/county local gas taxes. So that, through 2050, is going to bring in revenue to pay for the Regional Plan. So anyway, I just want to bring that up, because we do actually have it. I read all these little details, I'm geeky like that. So anyway, thanks.

Chairwoman Nora Vargas:

No. I'm sure people are not saying that they haven't read it. I think what they're saying is how do we digest 26 pages into one document, so that the community who is not responsible for doing this work every day can actually absorb it. Right? I think that's what I'm hearing from my colleagues, but thank you for sharing that. Councilmember Duncan.

Councilmember John Duncan:

Thank you. So this matter is on the agenda today as a public hearing, correct? We're not taking action today? So-

Chairwoman Nora Vargas:

Nope. That's exactly what I said.

Councilmember John Duncan:

Yes, and that's exactly what I'm repeating rhetorically. The vast majority of the other directors' comments and questions, to me today, were totally appropriate with having a public hearing. So I felt that Mr. Ihkrata's comments about our conduct is inappropriate and very excessive in regard to chastising us for asking questions.

For me to ask a question about in the calculation of an increase in greenhouse gases based off of the amendment to the Regional Plan that we're having a public hearing about, and whether that's primarily about an increase in vehicle miles traveled, as whereas they may be suppressed if there's a road user charge, is exactly what I think we're here and we're supposed to do.

And I don't think that our CEO should chastise our fellow directors when they ask a question and want to try to understand something. I understand maybe he's frustrated with the fact that the road user charge is coming out or that it takes a long time or that it's been work to be done, and I appreciate that, but I don't appreciate being chastised publicly for doing what I think our job is.

Chairwoman Nora Vargas:

So Councilmember Duncan, I think we all take information differently, and as somebody who deals with microaggressions on a day-to-day basis in every hour, I can understand where people may have different interpretations of the information that is provided. I do believe that it's appropriate for executive director to try to guide us and to share with us where the different laws are in the state and the local level. His directiveness may not be something that you appreciate, but I don't think that, in my opinion. there was nothing that was chastising.

I do take your comment and I appreciate your comment, but I also think it's important that our CEO has an opportunity to be able to delineate where the rules are coming from and some of the feedback that he's getting. Which is why I also emphasized, with no intention of chastising anyone, that it was important to ensure. And I think Councilmember Cardenas, also Deputy Mayor Kat McGovern has also mentioned it, and a couple of other folks, that it's really about a lot of the discussions that are taking place are philosophical.

Because if you heard the passion the Councilmember Shu had around some of the goals, and Mayor Minto had a very different, separate discussion and I was, "Ah, okay, well climate change is real for me, but he's looking at it from a different lens." I think those are philosophical questions. And so, I apologize that you may be absorbing this information in a different way, but I do think it's important that our CEO has an opportunity to share information. We can work together to figure out how that information is shared and move forward. But I do think it's appropriate and I'm sorry that you took it a different way. Go ahead.

Councilmember John Duncan:

May I respond?

Chairwoman Nora Vargas:

Actually no, we'll keep moving. So go ahead. I mean, did you want to say, because I am happy to have a... If this is a personnel issue, we can have it separately, because I think it's important. I just wanted to address to you how I didn't see it that way, and I acknowledge that what you saw is your perspective and I think that's important. Is there anything else that you want to add?

Councilmember John Duncan:

Yeah, just very briefly. I think everything you said about what the CEO could do can be done by saying those things without the chastisement part, and we have spoken about that before. And the other just last comment I'll make is, when people make very lengthy comments about that they think that the meeting is taking too long, they don't seem to realize that they're very lengthy comments about the meeting taking too long is causing the meeting to last a lot longer and have people respond to those comments. Thank you.

Chairwoman Nora Vargas:

The meeting is going to take as long as we need it to happen and people can have their opinions. Go ahead, sir.

Caltrans Director Gustavo Dallarda:

Thank you Chair Vargas. I wanted to comment on two things quickly. One is on the importance of VMT reduction. And you may recall a year, but maybe it was two years ago, we had CARB here explaining why GHG and VMT reduction is important. And my recollection, and maybe if we can pull up that meeting and share the presentation with some of the new board members, was that even after the state has a very good program to change the fleet from gas or diesel-consuming vehicles to electric, and it's leading the rest of the nation and the world in that respect.

But even when those mandates come up, that's for new vehicles. And there's going to be many years where people don't change the vehicles every year and some people cannot afford to do that. Truckers sometimes they can't afford to buy a new truck overnight, so there's still going to be millions of gas and diesel-consuming vehicles and that's why it's important to continue looking at reducing VMT. So that was one comment.

The second comment was I want to echo what Mayor Kranz said, I'm not ashamed, but when I go to put gas in my car, I am paying a road user charge and we're all paying a different road user charge. If you're lucky enough to have an electric vehicle, you're not paying anything when you charge. None of the money when you charge is going to maintain and keep our transportation system in order. If you happen to have an old car that is not fuel efficient, you're paying a lot more than somebody that has a fuel efficient vehicle. That speaks to the inequality that Mayor Kranz talked about.

And with more zero-emission vehicles on the road, that means less revenue to be able to keep our transportation system in good order so that you can keep traveling on it. So that's why this state and many other states, and eventually the federal government, will have to look at a different way of collecting from people so that, because collecting at the pump is not going to yield enough money to be able to keep the system going. So I hope that that clarifies. Thank you, Mayor Kranz for bringing that up.

Chairwoman Nora Vargas:

Thank you. And there's a lot of discussions happening in the state about how we meet our goals, infrastructure needs funding. And I think the other piece of it is the amount of funding that's going to come from the federal government so that we can ensure. This is the first time that we're going to get that much funding for some of these initiatives and projects. And so, how do we make sure that that is being allocated to address some of these challenges that we have? Let me go ahead and Mayor... I mean, Councilmember... Yeah, yeah, White.

Mayor Dane White:

Thank you very much.

Chairwoman Nora Vargas:

Mm-hmm.

Mayor Dane White:

I just need some clarification on something that Mayor Jones had said, and that is the revenue collected from a road user charge cannot be put back into roads. Is that accurate? The region? Got it. So with that being said-

Chairwoman Nora Vargas:

Hold on, let me ask, can somebody respond to that question?

Keith Greer:

I'm not sure I can. So the revenue generated from RUC would go into implementing the Regional Plan.

Mayor Dane White:

Correct.

Keith Greer:

Yes.

Mayor Dane White:

Which is mostly public transportation.

Keith Greer:

It's all the policy projects and programs in there. It's a slew of things.

Mayor Dane White:

Okay.

Chairwoman Nora Vargas:

Where's our...

Mayor Dane White:

With that being said-

Chairwoman Nora Vargas:

Hold on one second. Hold on, hold on, because I'm hearing no over here. So, Coleen?

CEO Hasan Ihkrata:

No, it's not mostly public transportation, it's for the programs, right, Coleen?

Coleen Clementson:

Yeah. So the road usage charge, if there were a regional road usage charge which is being pulled out of this, it's pretty flexible and what it could be used for, because actually the people and the board would get to decide how to utilize that. So the state would set the rules for the state road usage charge. Any regional collection would really be up to the board and ultimately the people to decide how that money should be spent.

Mayor Dane White:

Understood. Can you clarify-

Mayor Rebecca Jones:

It says right on page V4 that the eligible uses are transit capital and ATP/programs. That's where the Xes are on that actual page. It has transit operations blank, highway capital blank, highway operations blank, local streets and roads blank, and then also debt service blank. It says specifically on that page, those two eligible uses, because that's what is called, eligible uses. [inaudible] source-

Chairwoman Nora Vargas:

Mayor Jones, I'm just going to ask you to use your clicker. I just want to be fair-

Mayor Rebecca Jones:

Sorry.

Chairwoman Nora Vargas:

... because there's other people-

Mayor Rebecca Jones:

Certainly he's fine. [inaudible]-

Chairwoman Nora Vargas:

... waiting in line.

Mayor Dane White:

It's okay. I asked her-

Chairwoman Nora Vargas:

I know. So if I can just ask, hold on one second. We need to have a process so that we are able to make sure that everybody who is asking to... When you get elected, you are happy to run this meeting. Okay. We're going to have a process and I want everybody to have discussion, but I have people waiting on the queue. If you have specific questions for anybody, we're going to have staff respond. If you have specific questions to a colleague, I'm going to ask the colleague to put yourself on the queue so we can follow a process. Is that cool with everybody?

Mayor Dane White:

That's fine. And moving forward-

Chairwoman Nora Vargas:

All right, fantastic. Go ahead and ask your question.

Mayor Dane White:

So my point is, with that being said, I represent the fourth-largest city in the county, where the average household income is \$30,000 below the county average. If my residents, in large part, are construction workers traveling throughout the county are being charged for every mile that they drive and that money cannot be used to be reinvested back into those roads, that seems pretty inequitable to me. So I just wanted to make that point and hope we can find something that works for all cities, not just a few.

Chairwoman Nora Vargas:

Okay. [inaudible]?

Vice Chair Sean Elo-Rivera:

Thank you, Chair. I just wanted to pivot back. I appreciated your comments. Recognizing exactly as you said the way that different comments can land with different folks. I also did not hear a chastising of the board and I think it's really important that staff can speak directly with the board about when we are and are not staying on track with what we have to do. And if we respond in a way that makes them feel like every time they are direct with us, there's going to be blow back.

We're going to have staff that's walking on eggshells, and we are dealing with highly technical issues, with legal requirements, and this whole thing's going to get screwed up. And so I think that there's a necessity for decorum and for respect amongst the board, amongst the board to staff, to staff to board. I also don't want to create a culture or environment of folks not feeling like they can say, "Look, we're going... It's an important road that you're traveling down, but it's not the road that we need to in order to end up at the destination that we have to for this particular conversation."

I think that staff has done a really good job of that. And I haven't been here for that long, but I was here last year, and as Mayor Kranz mentioned, this issue was used to bludgeon this agency over the better part of, we're going on almost two years now. And so I think that's important context for any response from staff or other board members when this conversation is happening. Because while your questions and comments might be on the up and up, the reality is that not all of them have been.

And there has been a lot of... I won't even go down the rest of that path. But I just want to add that context, I want to support the chair's comments, and I really, really hope that we can appreciate staff's responsibility to be direct with us when we are talking about technical issues and legal requirements. The last thing that I'll mention, it's important to note what Coleen had said there. Ultimately, we are the board and we will have policymaking authority to determine how equitable the way any revenue that we bring in is utilized. I'll conclude there, Chair. Thank you.

Chairwoman Nora Vargas:

Thank you. With that, we're going to go ahead and close the public hearing. Thank you everyone for your feedback. Continue to process this and then we're going to go ahead and move forward. We have a focus in how we're going to go and do the next steps.

Web, Workshop and Email Comments

Web Comments	
Shannon Biggs	Thank you for getting rid of the Road Use Tax. I was worried about the impact it would have on our blue collar workers who have to use vehicles transportation.
Carla Pekin	please announce meetings well in advance. Please hold meetings at a time when people can actually attend. Not work day hours.
Paul Lindsey	The amendment states, "result in a net decrease in revenues from \$173 billion identified in the 2021 Regional Plan to \$165 billion. This revenue would still be sufficient to fund the anticipated \$163 billion of planned transportation improvements included in the 2021 Regional Plan." If the income without the road usage charge was sufficient to pay for the 2021 Regional Plan without reductions, then why was the RUC even included? This calls into question the entire methodology used to calculate the funding requirements. Is SANDAG simply cooking the numbers to make it work?
Alejandro Ortega Jr	<p>Removing the RUC is necessary, it seems that the organization has not taken into account, nor reviewed, data on the cost of living and how many residents within San Diego County commute for employment. While San Diego is not Los Angeles in size, we are still a vast area. I, myself, commute from Oceanside to Miramar and the initially proposed RUC would've added a significant strain to my situation on top of already high gas prices (which have always been historically higher than the rest of the nation), high rent/mortgage prices and for any parents, high cost of daycare expenses. You cannot add additional costs to residents by saying that they now have to pay a per mile tax to just go to work and for daily lives, that is unethical. My proposal that has always been a lingering question is why aren't county officials researching public transportation systems that are on the east coast. It's understandable that we cannot have subways due to our regional geographical setup, but rail systems that are above ground work. When say in above ground, not cutting traffic off on regular roads, but above the roads.</p> <p>Yes, ANY project is going to cost money, but, and this may be a personal rant, officials need to understand and estimate that while initial costs may be high, the long term effect is providing a reliable and sustainable public transportation system that will allow more residents to use public transportation and reduce traffic congestion and our carbon footprint. Making it easier for residents to get from North County to South County without having to take 4 hours is something many have been asking for years.</p>

Web Comments

Morgen Ruby	Page 7, titled "The Challenges" - it is unclear if these infographics represent regional or national data, such as stated in the pedestrian fatalities statistic. Can you add either a footnote or embed in the text, for example "only 12% of residents ~in the region~ live within..." to help put the numbers into perspective?
Public advocate, retired	As a prior activist for environmental oversight, I see San Diego unelected board making decisions for bureaucrats who prepare today's imagining for the future. There will be no future as Los Angeles and San Francisco with San Diego following in their footsteps. Failed leadership abounds as we look at tomorrow's vision of creating division among the people with some bureaucrat's opinion of equity. Having San Diego to carry the burden of Mexico's open cesspools who pollute our beaches when they have a Trillion-dollar budget, but they come beg for help while our leadership falls for it every time a meeting is held at Tijuana River Valley Regional Park. Mexico has yet to set a Net Zero target, Mexico is the second-largest greenhouse gas (GHG) emitter in Latin America and the Caribbean. The reduction of fossil fuels when there is no alternative but an ancient grid. The infrastructure of our streets are in decay and held together with patch work that fails as it rains. The homeless programs and shelters fail at accountability. As a native San Diegan and a once democrat supporter, fix today's problems and not leave it for some bureaucrat in the future if there is any. It's all about money and following the tribe of destroy and rebuild, yet they never created anything themselves. So, what is our elected officials doing? But delegating their responsibilities to bureaucrats who are not held accountable of how they are destroying our once beautiful city piece by piece. They appear and disappear and deny during voting time.
Brooks Rogers	<p>I think the proposed RUC would have been hard to implement and can see why it had so much pushback. I do agree, however, that everyone who uses our roads should be paying to maintain them and that can not happen purely through a gas tax.</p> <p>My suggestion is to achieve this through the use of more tollways in the region. Tollways are especially useful in the SANDAG region because so much of our traffic is just passing through between LA and Mexico. The addition of more tollways would allow us to charge those who use SANDAG region roads in direct proportion to how much they use those roads. Like Delaware we would be collecting a lot of toll money from people who are just passing through and would not normally have to stop at our gas stations to pay gas tax or skip out on a RUC if it did exist.</p> <p>An added benefit of more toll roads is that it would encourage people to use other forms of transportation such as busses, trolleys, and bikes.</p>

Web Comments

Completely unrelated, lets remove the 163 through Balboa park and replace it with a trolley line that would connect all the way to Convoy Street! Would give us a trolley stop in Balboa Park, rid the park of the road noise and pollution, connect convoys to better public transit options as that area is built up with more residential units.

Peter Adams

I am opposed to the Road User's Tax. Especially as it doesn't appear to fund road maintenance and expansion. I am also opposed to unelected bureaucrats pushing new fees/taxes on tax payers. Sandag and Carb should be disbanded/eliminated/reorganized. Their mission should be facilitate efficient movement in and about the region, not to milk the citizens to accomplish their misguided goals.

Sharon

Instead of imposing a mileage tax SANDAG should be pressuring the local and state governments to drop gas taxes and let federal taxes be used for new types of transportation infrastructure. Toll roads are better and less invasive of personal liberties. Plus they are not conducive to being hacked as individual devices in each vehicle.

Marc Hobelman

While I understand that the RUC was largely unpopular with the public and with regional leadership, I am disappointed that it's being replaced by measures that only barely still meet the GHG emissions goals of the state. We had a strong, ambitious, sustainable direction in the original plan! But the compromise will add years and years of additional car dependency and auto-oriented development pattern to our region. There isn't a suggestion I have that can make this amendment work better from my perspective on San Diego's future. The only thing I can suggest is to not include the amendment at all.

I'm disturbed that the political pressure has resulted in this compromise where the projections now include more emissions, more VMT, worse air quality, worse transit ridership, and worse fiscal standing in the future. Those adjusted projections are explicit in the amendment, but they leave out crucial knock-on effects. Reducing VMT would not only make our region environmentally and economically more sustainable by the metrics listed here, but it would compound the benefits associated with less car dependency. Parking pressures, auto traffic, street noise, pedestrian safety, community connection, and local business foot traffic would all improve if we are bold enough to enact incentives to change travel mode behaviors.

We can't acquiesce to only do popular, incremental, half-measure at a time moves in a climate catastrophe. We have to do as much as we can as fast as we can. I thought it was bold and impressive

Web Comments

when the initial plan asked our fellow citizens to step up and work together to achieve big things. This amendment reveals that we might not be the world leaders our generation is demanding us to be.

James Anderson	I think sandag should be dissolved. I don't think city mayor's should be deciding regional projects or assessing taxes and fees to a region. Getting elected to an office doesn't make them smart. As far as a use tax , that's unrealistic for this region. How will visitors from out of state be charged? There is no fair way to implement this. Get rid of sandag now.
Charlotte Kingston	I am against the proposed amendment for a mileage tax. As a senior, my social and lifelong learning events require independence to travel the county. On a fixed income, we are already feeling the effects of higher fuel costs that include more taxes than in most other states. It is imperative that we are able to pursue our interests until we are no longer able without more taxation.
Jacob Finnell	<p>I oppose the removal of the road user charge. Adopting the charge will make San Diego a leader in</p> <ol style="list-style-type: none">1) Disincentivizing driving &2) Raising funds for transit projects <p>Both of which are critical for achieving our climate goals, as well as advancing mobility for all San Diegans.</p>
Nancy Goldstein	<p>I appreciate the opportunity to comment about the proposed driving/road tax. I have lived in San Diego for 45 years after relocating from New York. It's been a wonderful city and I'm very proud to live here! However, this initiative to tax people for our given right to drive on the roads we already pay taxes for is absolutely ludicrous. It's already an extremely expensive city to live in and many people are leaving San Diego and California due to the cost of living and won't be able to retire here either. I'm totally against the idea of taxing our citizens and hard working people for something we're already paying taxes for in several was with the high gas tax, toll roads, etc. Also, we should be able to drive our vehicles without being tracked, or paying extra money! Please do the right thing for the people of San Diego and of California by NOT allowing this absurd RUC proposal to be voted into law. Thank you</p>
Robert Scott	<p>Please include in your long-term plans a bike and pedestrian undercrossing along Carmel Valley Road at Interstate 5, connecting the Carmel Valley neighborhoods east of the freeway to the Los Penasquitos Lagoon and Torrey Pines reserve areas and beach west of the freeway.</p> <p>Without a direct connect from eastbound SR56 to northbound I-5, bicyclists and pedestrians effectively travel on a major highway between El Camino Real and the I-5, a very hazardous condition for the</p>

Web Comments

bicyclists and pedestrians alike. The walk to the beach would otherwise be lovely except for this area of pending motorist-pedestrian conflicts.

Kilroy was supposed to forward the design plans for an extension of the SR56 bike path under the I-5 as a condition of approval for the One Paseo project and I do not know the status or exact requirements of that condition.

Please don't miss this opportunity, it looks like it could have happened with the I-5 widening project (like the new paths in Solana Beach and Encinitas) so let's not let that happen again.

Thanks,

Respectfully,

Bob Scott, PhD

Alan Feingold

Cars are here to stay. Please stop pretending that people will give up their vehicles and take up biking. Not going to happen. To improve traffic flow, coordinate traffic signals. A red light at each intersection helps no one. Stop with the "road diets". Keep lanes the proper width. Roundabouts may be engineers dreams but drivers hate them. Stop taking away traffic lanes to add bike lanes. We have enough. Maybe too many. Enforce traffic laws for bikers. They regularly run red lights and pay no attention to cars or pedestrians. We need age minimums (16?) for e-bikes. Bikers must be licensed and bikes-both electric and not-need easily seen license plates. To replace revenue lost from electric vehicles, they need an annual road-use fee or a per-mile fee or both. Gas/diesel vehicles pay a road tax with every gallon of fuel. Electric vehicles are getting a free ride. They need to pay their fair share.

Carla Pekin

I do not in anyway approve of the road usage charge. It must be removed

G. King

Stop increasing our taxes during this recession / depression. NO Mileage Tax!!! People are struggling to pay bills as Feds print unbacked currency & steal from our devalued savings through 4 to 9% inflation. WE DON'T HAVE MONEY TO SPARE!

G. King

YOUR CEO IS STEALING TAXES BY LAVISH DINNERS & BOOZE BILLS.

Web Comments

G. King	<p>“Taxpayers Pony Up for Transit Systems They’ll Never Use, The median resident of Southern California takes zero transit trips annually, and only 2 percent of the region’s population frequently uses mass transit.” STEVEN GREENHUT reason.com 7.7.2023</p> <p>Lethal Danger from gangs, crazy homeless & aggressive dogs Unsanitary with homeless' & dogs' pee & poop Respiratory Viruses, TB, lice, Hepatitis, MRSA Strikes, walk-outs, & sick-outs by drivers & mechanics shut it down 20 minute drive becomes a 2 1/2 hr ordeal Need pre-purchased tickets or exact change "...Road diets' that increase congestion by reducing the number of traffic lanes in a silly quest to prod us into abandoning our cars. 'equity platforms' to promoting affordable housing. ...The Caltrans future blueprint is more about battling greenhouse-gas emissions than creating bus systems that arrive on time and freeways that are less congested. It's a long mish-mash of politically correct goals, bolstered by legislation that treats customer concerns as a side issue."</p>
G. King	<p>You broke your commitment to build more single car freeway lanes when we passed the last county tax increase for roads. YOU LIE TO OUR FACES.</p>
G. King	<p>When epidemics, terrorists, gangs, homeless crazies, get on the bus, train or trolley, then I want my car. YOU DON'T GET ON THOSE EITHER!!!</p>
G. King	<p>NO TAXATION WITHOUT REPRESENTATION! San Diego & Chula Vista unfairly dominate SANDAG. North County gets nothing. Disband SANDAG!</p>
G. King	<p>Mileage tax requires you track our movements like a creepy stalker. My privacy is not any of your business. NO MILEAGE TAX, it makes you look like communist dictators.</p>
Michael LaDouceur	<p>Comment 1: It is inappropriate and irresponsible to update future revenue (Updated revenue assumption 3 in particular) while failing to update future costs. Cost estimates were based on costs in 2020 dollars. It is unclear whether inflation was factored into the cost estimates provided in Appendix U. Inflation over the last 2 years has been historically high and could have a large impact on whether the cost estimates from 2020 are still reasonable. As such, it is inappropriate to compare updated Transnet revenue (updated with the most recent data) with outdated cost estimates. Therefore, it is unsupported and</p>

Web Comments

incorrect to state that revenues would exceed costs under the proposed amendment. It is also unsupported and incorrect to state that “no changes to projects listed in the 2021 Regional Plan would result from the proposed Amendment”, because no such analysis has been completed. SANDAG has the fiscal responsibility to update the 2020 cost estimates to ensure that both revenues and costs are using similar projections.

Comment 2: SANDAG has not provided reasonable justification for updating the State Discretionary Program estimates and Federal Discretionary Program estimates. SANDAG should provide justification for the estimates. Has SANDAG or other local or regional transit agencies received increased funding since the Bipartisan Infrastructure Law (BIL) was passed? Are there reasonably foreseeable dollars that will be coming from BIL and how is SANDAG certain of this? Appendix V of Attachment A to the Errata states that Federal funding “assumes one large New Starts eligible project and three Small Starts eligible projects per decade...”, but it is unclear how these assumptions were made and whether they are reasonable. These assumptions are critical to balancing revenues and cost and implementing all aspects of the 2021 Regional Plan. Future transportation plans could be significantly altered if these assumptions are incorrect, which would lead to other calculations being incorrect, such as the projected decrease in Green House Gasses.

Alex Wong

I commend SANDAG for removing the road user charge from the RTP. While I support SANDAG's continual quest to invest more on transit instead of on freeways, a road user charge could actually prematurely drum up NIMBY opposition against mass transit when road user charges are levied before massively improving San Diego's frankly low-frequency, inconvenient transit.

Consider this: Canadian cities like Vancouver and Calgary do not have VMT taxes or congestion pricing but have achieved over quadruple the per-capita transit ridership of San Diego. These cities realize that it's important to first optimize transit service to maximize ridership, to give motorists a great alternative to driving before levying road user charges.

I never expect transit to be profitable. I support sales taxes like Let's Go San Diego's initiative to raise funds for transit. These sales taxes, unlike road user charges, do not involve data/location privacy issues and therefore are much less controversial.

Web Comments

Stephanie Kaupp	<p>SANDAG's Regional Plan does not provide realistic options for decreasing the traffic to and from Coronado or the other military bases in San Diego. SANDAG needs to work more closely with City officials and the military to create more viable, cost effective transportation plans that include the health and safety of residents and our military personnel. One solution for Coronado would be for the Navy to provide additional single room housing units on base, at NASNI, the Amphibious Base and Training Center for active duty military personnel. The Navy currently provides shuttle services on base at NASNI, and could expand services between the other two bases in Coronado. This would help relieve at least a small percentage of the volume of traffic impacting Coronado and the lives of our military personnel, Additional options and better use of taxpayer funds would be to build several parking structures for all military personnel and contractors working at the shipyards and San Diego bases with continuous electric shuttle services to and from. And additional ferry services to NASNI and the shipyard from San Diego, and new services from Pt. Loma, Chula Vista and National City. The use of mobility hubs and MTS buses won't reduce the use of vehicles due to conflicts with schedules and requirements for the need of a personal vehicle. More than 100,000 cars every work day continue to cross the Coronado bridge with the majority of vehicles traveling to and from the military bases located in Coronado. And with the Navy's plans to increase the pier-side maintenance for three aircraft carriers being in port at the same time from 29 days per year to an "average" of 180 days per year the volume of traffic will increase exponentially. Coronado residents respect the work and demands placed on our military and also want to reduce the traffic gridlock, and protect the safety of drivers, bike riders and pedestrians sharing our streets. Additional options in the Regional Plan need to be explored, and foolish and dangerous options such as adding a bike lane on the Coronado bridge need to be removed from the Regional Plan. Health and safety must be the number one priority along with more realistic and creative ways to spend our taxpayer dollars on transportation plans that work with our current roadway systems, landmass restrictions, protect our environment, public health and welfare.</p>
Truth	<p>Getting rid of the Road User Charge Tax out of the SANDAG 2021 Regional Plan was great. But here's why the entire SANDAG Regional Plan is still horrible:</p> <ul style="list-style-type: none">• It cost \$1.5 million just to remove the Road User Charge.• The 3.3 cents Per Mile Road User Charge was fraudulently suggested as necessary, when it wasn't.• Even without the "Regional" Road User Charge, there is still a State Road User Charge coming.• There is No guaranteed funding for this plan, and SANDAG is already operating with over \$2.4 billion in Long-Term Debt.• The original 2021 Regional Plan met the California Air Resources Board's 19% GHG reduction target, but the SANDAG Board of Directors was told it didn't just because a select few didn't want to round up the

Web Comments

18.6%.

- There has never been discussion as to the details of why there is a GHG reduction goal. Is it to reduce warming temperatures? If so, by how much? If not, then is the goal cleaner air? If so, what is the measuring tool?
- The Real goal of this Regional Plan has always been about Controlling Mobility – it doesn't matter if it's a traditional car or a new expensive and combustible lithium-based electric car. The admitted goal of this Regional Plan, via the State of California and funded by the Federal Government, is to reduce Vehicle Miles Traveled.
- TransNet Taxes on drivers are being used towards bike lanes and pedestrian projects. That's taxation without representation.
- There are going to be 800 miles of Managed Toll Lanes.
- Hasan Ikhata admitted that there will not be any new highways or lanes when that's what would actually help trip times, congestion, and air quality.
- SANDAG talks about "Shorter Boarding Times, Faster Travel Times, and More Frequent Transit", but only 1-3% of people even use public transit! And according to SANDAG Deputy CEO Coleen Clementson, the trolley only goes 20MPH, and there's not even enough public transit drivers as it is!
- The 2021 Regional Plan approved on December 10, 2021 reads:
"[Smart Cities with]...a High Concentration of people...
...Microtransponder ownership of 100% by 2035.
Converting existing...lanes to Managed [Toll] Lanes. ... Substantially Increasing the Price of Parking [and] the Cost of Driving.
The system...[means no] No new highways or general...lanes.
More than 93% of housing...will be Multi-Family [stack-and-packs]...
Residential Parking Permit...
...[Our] GHG Reduction Goals will Require...Fundamental Transformations in the Economic, Social, Technological, and Political Fabric of Life in California and Beyond...
Government...Regulating Economic Activities and Personal Behaviors..."
- Based on that above information, there will still be microtransponders in everyone's cars to track their trips for "Vehicle Miles Traveled" fee or "Vehicle Hours Traveled Fees".
- Hasan Ikhata, who admitted to blocking the Audit, had a charge of over \$300 worth of taxpayer money on a dinner with Lorena Gonzalez and Nathan Fletcher at Donovan's Steakhouse, while getting paid over \$580,000 a year, and now finally resigning, is the one who pushed this Totalitarian Regional Plan, openly admitting that it's about "Behavior Change" – not saving the environment from GHGs.
- SANDAG is working to implement the Totalitarian United Nations' 2030 Agenda, as overtly expressed in the joint February meeting with SANDAG, Mexico, and UN Habitat. This agenda includes making sure people are stacked-and-packed into high-density Smart Cities away from suburban and rural areas,

Web Comments

discouraging what the UN calls “sprawl” and “human settlements”. Based on that joint meeting, there seems to be an idea to create a “Bi-National Association of Governments” in order to further Consolidate and Expand power over Americans’ and Mexicans’ lives.
These are a just a few reasons why this SANDAG 2021 Regional Plan – and the future 2025 Regional Plan – need to be disposed of into the hazardous waste bin. Short and sweet of it: Expensive, Unrealistic, Inequitable, Invasive, and Totalitarian.

Virtual Workshop July 18, 2023

Unknown I’m just wondering if this process has any effect on the planning for the 2025 Regional Plan.

Virtual Workshop July 31, 2023

Alex Wong Yeah, can you hear me? I would just like to make it clear that, I thought that the difference between the Draft 2021 RTP and the 2021 RTP final version was the purple line frequencies would increase from every 10 minutes to every 5 minutes during the peak hours. I just wanted to confirm if that was true, and if so, I would strongly recommend reverting back to 5 minute frequencies because I believe that the purple line, you know, put that there. I mean, we definitely need to. Hi everybody. I thought that the purple line now had a 10 minute frequency rather than a 5 minute frequency.

Original Dra I am curious to know if you guys are aware of the UN agenda plan to enslave the people in 15 minute cities?

Original Dra I find it interesting that you guys don't want to answer that question when Nora Vargas is going to the UN and getting awards for UN Habitat BS. And then you have Hasan who is going and getting awarded for attending some metropolis stuff. And they're all pushing this stuff in the community listening to globalists tell them what's best for the people in San Diego. And when I am asking you a question, that is not a comment. That's a question that you, if you're not aware of what you're pushing, you need to find out because there are 15 min cities coming down the pipe that they are pushing. And all of the things that you are going on with SANDAG and their whole, you know, push for al of this climate BS. Because you guys won't even look at stuff that is going on with the environment like you're sitting here claiming that you want to protect the environment and your plans and doing all these things. Yet at the end of the day, the things that you're pushing are actually not good for the environment and they aren't healthy for people. Like electric vehicles have these lithium batteries that are combustibile and can recombust just from fumes and they're not recyclable just to make them. They're totally toxic to the environment and the people and nobody wants to acknowledge that. That's why when you guys are

sitting here selling people that you're pushing some kind of plan. You need to be honest with the people and tell them what agenda this is, because it's the UN's agenda, the World Economic Forum agenda, all of these globalist elites who don't care about the people and are pushing them into 15 minute smart city enslavements. And it's all under the guise of like protecting the environment. And all we do is sit here and push that, but then it's like, we don't talk about the radiation that comes from these changing stations that are going to be set out to be everywhere. Or the vehicles that emit as well. SO as you're sitting here and you're telling me that you can't answer a question like that or that it's just a comment. It's not a joke. You should know what you are pushing. The people that you are letting push you to do these things. I mean, cause do, do you know that Nora got an award for engaging with the UN? I mean, and that's sad. So if you don't know that, you need to be doing your own due diligence and either listening to the people that come forward and tell you things that may seem crazy, but you need to look into. Because it's very serious, and this is a totalitarian takeover and you may think oh she's crazy and I don't really care because I'm here to blow the whistle and tell people what's really going on and not just like go along to get along. Because what's happening in this county is very, very disturbing. And people are so asleep. Because of what happened with COVID, they think that that's just it and you guys are coming in hot, you're taking away all of these freedoms that people have been acting like we're progressing when we're actually regressing and like going back in time. Because if we were like moving forward in the future, you know, it would be flying in cars. We wouldn't go back to walking and biking. And making sure that people are within a 15 min zone of everything, you know, just for the climate. We were building metropolises around all these areas and it's very sad that people don't see it and it's sad that you guys don't even know who you are engaging with, yet you're pushing this agenda. And then when somebody comes out and ask you if you know anything about it. You want to shut them up and be like, well, that's just a comment, and I can't answer. Well, you should be able to answer it. And if you don't know what I'm talking about, you need to go and do some research. Because the United Nations ain't no joke, you know the real. And what they have planned for the people ain't no joke either. And they're in bed with some really nefarious people. And so if you don't want to be under the same light, then you need to get out of that umbrella under them and start thinking on your own instead of pushing their agenda.

Alex Wong

Ridership reduce emissions and reduces traffic, and San Diego's airport needs the people mover on an airport trolley branch. Actually, between today and the little town at the bottom, that's both the green and blue line. NPS proposes to keep piggy backing on on their airport trolley branch and grant all protectors in the blue and green lines between Penn State and Middle Town. The problem is that [unintelligible] past the 20 minutes per hour. The blue and green lines need to have 8 trains per hour per directive or 15 trains combined with about 7.5 minute frequency. Within Valley and University City. These communities at least 15 trains per hours. Well, at least the airport trolley only 4 trolleys per hours can make that 15 minute frequency. There's the next slide. We need people movers like in the downtown that provide a 4 minute frequency. Travelers can be to the airport in 15 minutes. It's not what's supposed to happen in the airport trolley branch. Because operation costs for higher drivers and simple probably to use automated company for drivers. That's why we need to connect the airport and downtown with an automated people mover. By people mover I do not mean speculative technology. I mean proven, high tech that could carry over 300 people. Think the APM not that the airport peplemover, but just as in our system and in the system of light rail. My group is even for being perfectly a lot more people needed. And APM will run every 4 minutes versus calling every 15 [unintelligible]. And this one is a space for both pedestrians and the car. If you know, I would accept more only by taking that step up. First of all, APM would not disrupt existing airport service. Compared to the Poly, the aerial, and the APM would at least be built on much better operations. That's why I strongly support APM and recommend an aerial people mover only. It's the most cost effective option, it's the lowest cost per mile. And yes, there, of course, some people may, they complain that aerial structures block views. And poly will probably block even more views because they have directory systems and those or, usually [unintelligible] overhead wires.

Francisco Ortiz

How will the likely conversion of the state gas tax to a RUC mileage tax affect the region's decisions to remove the RUC from the Regional Plan? Could it impact the region and the local jurisdictions eligibility to see federal and state funding?

Email Comments

Debbie Bergquist

I would like to respond to the 2021 Regional Plan. I am not in agreement with the road tax. I do not feel we need huge improvements in mass transportation. We do not need four bike lanes and only one car lane per direction on a street. I do not feel safe on mass transportation. This is a car driven society and always will be. Think about improvements for the freeways and street improvements for traffic flow. We already increased taxes in Solana Beach for road improvements and pot holes. What has happened to that money? Why are there individuals at super markets trying to get individuals to sign a petition for repairs on pot holes when it is really for another new tax?

Steven Smith	I am on your email list and received an announcement about a virtual meeting regarding the regional plan. I am unable to attend but have some thoughts about how best to spend my tax money on transportation. First, I would like for you spend the money on projects already promised regarding freeway and highway improvements. I do not use public transportation, I do not want to use public transportation, I desire to be able to continue driving my own vehicle on roads that are maintained and improved to first class standards. I certainly don't think it is asking too much for you to construct the projects promised with revenues previously collected that will improve our streets and highways. Second, I have a problem getting my head around construction of more public transportation projects that do not pay for themselves with the fares charged users. I understand there are some State laws mandating certain efforts to address climate change but I don't think you should just roll over and figuratively "throw under the bus" those of us desiring to continue to use our own vehicles and force us onto public transportation. Finally, I absolutely reject any idea of a mileage tax for persons choosing to drive on existing roads and highways. That is one of the most preposterous proposals I've ever heard. Find some way for electric vehicle drivers to pay their fair share. They certainly are not paying gas tax. I most certainly pay gas tax. On some level it is unfair for EV drivers to avoid this cost of operating a vehicle on public roads funded with gas tax.
Steve, Chair of NPPC	Good morning, The North Park Planning Committee is in the process of updating its CIP priority list for North Park. We would love to work with sandag on this update to ensure we are aligned. If you could provide input or a point of contact to work with that would be outstanding.
John Wotzka	A recent look at fires in shipping of EVs from Far Eastern manufactures, should be looked at by the Port Authority and the consequences on insurance companies and training of firefighters in fires involving Li-ion batteries will also be an issue. Hydrogen fueled cars will need to be reviewed too.
John Wotzka	The new Navy headquarters looks good. There are a lot of new high rise buildings going up downtown and we should see how higher speed rail will feed into the Harbor Drive and high rise building culture in the downtown future too, which is in the long term planning. Mayor Todd Gloria is hoping for a new city hall too. Offshore wind is picking up some interest and we should see if there will be any of it south of the border or into the Bay Front area. These are all long term and will need to be planned into the new city look.
Dwight Worden, City Councilmember, City of Del Mar	I have reviewed the draft Amendment to the 2021 RTP and offer the following comments, speaking only for myself and not necessarily for my city or my council colleagues: 1. I believe it was and is a mistake to remove the Regional RUC from the RTP, but I also understand that its removal was the direction given by the SANDAG Board. In that context the staff and draft Amendment do a good job of backfilling the Regional RUC removal. The Regional RUC only accounts for a bit less than 9% of the total estimated RTP cost of \$163 billion and the Amendment shows how the Plan can still proceed.

2. I note that the RTP Amendment acknowledges that a state RUC is still in the works, and I hope that SANDAG will follow that process and that the Plan can be further adapted to accommodate a state RUC if one is enacted, or a resurrected Regional RUC.

3. I am attaching a copy of an op/ed I wrote in the U.T in December of 2022 explaining my reasons for supporting inclusion of the Regional RUC in the RTP. This is still my position

Mary Davis

1. NO TO *ANY* ROAD USAGE CHARGE, ROAD CHARGE, MILEAGE TAX, ETC. - EVER! Both SANDAG and the State of California need to find other mechanisms to fund our roads (i.e., vehicle registration surcharge, Point-of-Sale or Point-of-Charge system, etc.)

2. WE REJECT THE PARADIGM SHIFT THAT BOTH SANDAG AND THE STATE OF CALIFORNIA ARE TRYING TO IMPLEMENT - going from a Public Benefit model of funding our roads & infrastructure to a 'User Pays' system which inevitably will involve telematics and tracking (regardless of whether the government does it directly or uses a 3rd-party entity.) #PrivacyJustice

3. NO TO ANY TOLLS OR NEW FEES, CHARGES, ETC. You are openly advocating to retire the SR-125 Southbay Express toll early, yet hypocritically wanting to impose them elsewhere. NO NO NO to any tolls anywhere!

4. RESTRUCTURE/GET RID OF THE WEIGHTED VOTE. No matter how many Retreats you hold with feel-good exercises, the weighted vote is a cudgel to wield control. You can utilize your 'Thumbs up/Thumbs down/Thumbs sideways' gimmick all you want, but as long as you have & use the weighted vote, you're saving the covert but most telling gesture for last ... middle finger(s) up as you flip the bird to most of the other members.

5. FIRE HASAN IKHRATA & REPLACE HIM WITH A MODERATE EXECUTIVE DIRECTOR WHO TRULY KNOWS HOW TO (& ACTUALLY WILL) BUILD RELATIONAL BRIDGES TO WORK WITH *ALL* PEOPLE.

Letters



August 8, 2023

San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101
RegionalPlanAmendment@sandag.org

Re: 2021 Regional Plan Amendment

The San Diego County Air Pollution Control District (District) appreciates the opportunity to comment on the 2021 Regional Plan Amendment (Plan). The District understanding of the Plan Amendment is that it consists of the removal of the Road User Charge (RUC) and updated revenue assumptions, but the projects and timelines remain the same as in the original 2021 plan. It is also the understanding of the District that the Conformity determination of the Plan is not changed.

Although the District understands the need to re-evaluate the RUC, it is unfortunate for the region that it will result in decreased transit boardings (page 10), decreased physical activity for the region's population (page 11), and increased exposure to particulate matter (PM) (page 11), potentially impacting the health of residents. There is an increased need to further reduce PM emissions to the extent possible in anticipation of the Environmental Protection Agency (EPA) review and likely lowering of the primary annual PM_{2.5} standard.

The 2035 regional growth modeling for the amendment shows removal of the RUC will contribute to more driving in the region, which will impact communities, particularly low-income communities in El Cajon and Escondido, with higher levels of particulates compared to the original plan. The increased PM in El Cajon and Escondido is due primarily to road dust from increased freeway driving from the removal of the RUC. These higher exposures translate to increased health risks for residents in those communities, and according to the Plan's Environmental Impact Report are significant and unavoidable, even with the proposed mitigation measures.

While overall emissions of criteria pollutants like reactive organic gases and nitrogen oxides (NOx) are reduced by the Plan, the emission reductions in the amendment are not as large as the original plan in the near term (increased daily emissions of NOx between 0.1- 0.3 tons per day between 2023-2026). These increases will contribute to ozone generation in the region (4.1 Air Quality Analysis Table 4.1-1)). These impacts do not rise to the level of significance for the regional analysis, but any increase in pollutants makes it more difficult to meet the region's air quality goals. The San Diego Region is currently non-attainment for both the 2008 and 2015 National Ambient Air Quality Standards (NAAQS). In our 2020



San Diego County
**Air Pollution
Control District**

Plan¹ to meet the NAAQS the San Diego region was reclassified to severe non-attainment for both the 2008 and 2015 standards because of our inability to attain the standards in accordance with the requirements of the previous classifications. These reclassifications to severe non-attainment require the San Diego Region to meet the 2008 standard by 2027 and the 2015 standard by 2033. The increase in short term NOX will make achieving these goals more difficult.

Although the District acknowledges implementation of a RUC has generated equity concerns on the fairness of road pricing, we encourage SANDAG to continue evaluating alternatives through careful planning, phased implementation and ongoing public outreach to achieve emission reductions. We welcome the opportunity to continue working with SANDAG and other member agencies on this Plan and upcoming efforts to create a 2025 Plan that is making our transportation system faster, more equitable, and protective of air quality and the health of residents in the region.

Should you have any questions about these comments please contact Eric Luther, (858) 586-2893 or eric.luther@sdapcd.org.

Sincerely,

Eric Luther

Eric Luther

Supervising Air Resources Specialist

¹ <https://www.sdapcd.org/content/sdapcd/planning.html>



Aug. 8, 2023

San Diego Association of Governments
401 B Street, Suite 800
San Diego CA 92101
Via: RegionalPlanAmendment@sandag.org

RE: City of Carlsbad Comments on the Amendment to the 2021 Regional Plan

To Whom it May Concern,

The City of Carlsbad appreciates the opportunity to provide comments on the proposed amendment to the 2021 Regional Plan ("Plan Amendment"). This is an important plan for this region and guides the next phases of growth for the member agencies of the San Diego Association of Governments ("SANDAG"). An effectively designed and implemented regional transportation plan ensures improved transportation options for area residents, businesses and other community members; meaningful reductions in greenhouse gas ("GHG") emissions; and improved quality of life as we grow our communities.

The City of Carlsbad ("city") is submitting the following comments based on the policies, projects, programs and other improvements included in the Plan Amendment. The city reserves the right to add, amend, change or replace comments and recommendations based on additional review and understanding of the Plan Amendment and the environmental analysis provided under the California Environmental Quality Act ("CEQA").

SECTION 1: LAND USE

1. Alternatives included in the approved 2021 Regional Plan assumed housing in locations that were inconsistent with the city's land use plans; this was discussed in detail in the city's August 6, 2021/September 30, 2021, comments on the draft 2021 Regional Plan (Attachment 1). Consistent with those comments, city staff recommend the Plan Amendment:
 - a. Consider the city's land use plans, including the General Plan, Habitat Management Plan, and Local Coastal Program.
 - b. Consider the McClellan-Palomar Airport Land Use Compatibility Plan (adopted by the county Airport Land Use Commission and amended Dec. 1, 2011) and the constraints identified therein.
2. City staff are encouraged by recent conversations with SANDAG staff that the proposed 2025 Regional Plan will consider the city's land use documents. Doing so is recommended and expected and will help ensure better accuracy of data and assumptions.

SECTION 2: COMMENTS AND RECOMMENDATIONS

City staff remain concerned that there is not enough detail on the feasibility of implementation of this significant shift in transportation strategy. On specific content in the plans, we outline our recommendations and comments below:

Transportation & Community Development Departments
1635 Faraday Avenue | Carlsbad, CA 92008 | 760-602-2710 t

1. *Paying for the Plan:*

The 2021 Regional Plan sets out an ambitious plan to build and operate a region-wide system of transportation projects, programs and other improvements. This is a substantial role for SANDAG to play in supporting both the construction and operation of these projects, programs and other improvements. SANDAG should set annual revenue targets to directly fund everything and should approve any recommended sustainable revenue tools to help meet these targets. Many of the funding strategies will require legislative changes, or voter-approved taxation. SANDAG should clarify what will occur if the funding is not available, if opposition to projects stops them from construction, and if General Plans in the region are not modified to implement the Plan/Plan Amendment.

2. *Appendix D: Sustainable Community Strategy Documentation:*

Appendix D includes the Sustainable Communities Strategy, which outlines assumptions included in the Activity Based Model 2+ ("ABM 2+"). This model will be necessary for use by publicly and privately initiated land use projects preparing documents for consistency with VMT/CEQA Guidelines and Traffic Impact Analysis ("TIA") Evaluations. City staff respectfully request direction from SANDAG on how to conduct modeling with the service bureau and how to factor in these assumptions applied to ABM 2+. Specifically, the addition of pricing, parking costs for coastal communities, 10% teleworking and micromobility. SANDAG should provide direction on how this could be worked into General Plans that are updated every 5-20 years. The plan should provide a process for implementing all phases of the Build North County Corridor (NCC) managed lanes project and the supporting active transportation infrastructure projects. It is also recommended that the plan pivot from the existing low ridership fixed routes transit services to flexible fleets along the I-5 and SR-78 corridors to maximize the objectives of the plan. As stated in the Regional Plan, priority Flexible Fleet will help make the region more accessible, equitable, and environmentally friendly.

3. *Appendix A: Transportation Projects, Programs, and Phasing:*

Trips to and from school sites result in a significant congestion, VMT generation, and peak hour delay throughout the region. Additional funding and projects should be recommended with a specific focus on improving safety and multimodal access in and around school sites along with programs to incentivize non-single occupancy vehicle trips to schools.

Table A.11: Given the proven success of the Carlsbad Connector microtransit pilot program, the city agrees with the Plan/Plan Amendment's recommendations to provide similar on-demand microtransit systems throughout North County at all mobility hub sites and major transit centers.

The preferred Interstate-5 freeway alternative identified in the North Coast Corridor ("NCC") Final EIR/EIS is the refined 8+4 Buffer alternative, with four freeway lanes and two managed lanes in each direction and completion by 2035. Appendix A, Table A.5 describes NCC project IDs CC004, 007 - 009 as "8F to 6F+4ML" with completion by 2050. While this might lead to further study, it is not clear why there is a different freeway configuration (i.e., reduction in freeway lanes) proposed. How does a reduction in lanes continue to meet NCC potential project benefits of maintaining or improving traffic operations and improving the safe and efficient regional movement of people and goods?

4. *Active Transportation:*

The city appreciates the Plan/Plan Amendment's overall approach of providing a connected network of high-quality bicycle facilities throughout the region. Regional bikeways are recommended throughout the city including along Palomar Airport Road which will provide a key east-west connection and El Camino Real which will provide a new north-south bikeway connection through the city. Both roadways are proposed to include "on-street bikeways". Due to the high traffic volumes and vehicle speeds experienced along most of both corridors, the city recommends considering "off-street bikeways" or Class I facilities where feasible in order to stimulate the shift from personal motor vehicle use to people choosing to bike.

It is extremely important that municipal transportation plans align with regional transportation plans to achieve regional goals for land use and transportation and to promote the region working together to build a cohesive regional transportation network. Considering there are currently no mechanisms in place to ensure municipalities coordinate local transportation plans with regional planning documents, the Plan should provide an approach on how SANDAG plans to engage with municipalities, especially in areas of potential disagreement or conflict (as aforementioned in this subsection and others). It is also recommended that the Plan Amendment provide additional direction regarding the application of protected bikeways in a variety of applicable contexts. While vertical measures such as soft hit posts may be appropriate in lower volume and lower speed roadways, arterial roadways with high traffic volumes and high speeds warrant much more substantial physical protection from vehicles. In addition, special consideration should be given at intersections and driveways which may be impacted due to the additional width and visibility impacts created by protected bikeways.

City staff look forward to working with SANDAG on improving mobility and land use access in the region and building sustainable, equitable and healthy modes of transportation, and we appreciate the opportunity to comment on the Plan Amendment that will help the region realize these goals.

If you have any questions related to comments on the transportation network, please contact Tom Frank, Transportation Director/City Engineer, at Tom.Frank@carlsbadca.gov or if you need additional information related to comments on the land use assumptions, please contact Eric Lardy, City Planner, at Eric.Lardy@carlsbadca.gov.

Sincerely,



JEFF MURPHY
Community Development Director



TOM FRANK
Transportation Director/City Engineer

City of Carlsbad Comments on the Amendment to the 2021 Regional Plan
Aug. 8, 2023
Page 4

Attachment:

1. City of Carlsbad comments on draft 2021 Regional Plan dated August 6, 2021

cc: Scott Chadwick, City Manager
Cindie McMahon, City Attorney
Geoff Patnoe, Assistant City Manager
Ron Kemp, Senior Assistant City Attorney
Robby Contreras, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public Works
Mike Strong, Assistant Director, Community Development
Eric Lardy, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Robert Efird, Principal Planner
Scott Donnell, Senior Planner
Nicole Morrow, Assistant Planner



Sept. 30, 2021

San Diego Association of Governments
401 B street, Suite 800
San Diego, CA 92101
Via: SDForward@sandag.org

RE: City of Carlsbad Comments on Draft 2021 Regional Plan

To whom it may concern,

This letter serves to inform SANDAG that the City does not wish to remove project CB32 from the Regional Arterials Project list.

Please disregard the comment regarding project CB32 from the attached letter sent to SANDAG on Aug. 6, 2021.

Thank you for bringing this to our attention, and please contact me if you have any other questions regarding the 2021 Regional Plan comment letter.

Best Regards,

A handwritten signature in blue ink, appearing to read "Tom Frank".

Tom Frank, PE
Transportation Director/City Engineer

Attachment A: Letter to SANDAG dated Aug. 6, 2021

cc: Scott Chadwick, City Manager
Celia Brewer, City Attorney
Geoff Patnoe, Assistant City Manager
Ron Kemp, Assistant City Attorney
Robby Contreras, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public works
Mike Strong, Assistant Director, Community Development

Public Works Branch – Transportation Department
1635 Faraday Avenue | Carlsbad, CA 92008 | 760-602-2766



cc: Don Neu, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Lardy, Principal Planner
Scott Donnell, Senior Planner
Corey Funk, Associate Planner

Public Works Branch – Transportation Department
1635 Faraday Avenue | Carlsbad, CA 92008 | 760-602-2766



Aug. 6, 2021

San Diego Association of Governments
401 B Street, Suite 800
San Diego CA 92101
Via: SDForward@sandag.org

RE: City of Carlsbad Comments on Draft 2021 Regional Plan

To Whom it May Concern,

The City of Carlsbad appreciates the opportunity to provide comments on the draft 2021 Regional Plan ("Plan"). This is an important plan for this region and will guide the next phase of growth for the member agencies of the San Diego Association of Governments ("SANDAG"). An effectively designed and implemented regional transportation plan would help ensure improved transportation options for area residents, businesses and other community members; meaningful reductions in greenhouse gas ("GHG") emissions; and improved quality of life as we grow our communities.

The City of Carlsbad ("city") is submitting comments based on the policies, projects, programs and other improvements included in the Plan. Our agency's comment letter is divided into two sections. The first section seeks clarity and other considerations that pertain to our agency's review of the Plan. The second section identifies the city's preliminary comments and recommendations.

Implementing the regional transportation network outlined in the Plan requires municipalities to support the regional vision and deliver on local infrastructure and services like the priority bus routes, local bus services, and pedestrian and cycling connections to major transit infrastructure. These components, which are delivered by municipalities, are essential to creating a coherent and comprehensive local transportation network that feeds into regional services. For that reason, an effective public review of the Plan should involve a transparent and thorough process for identifying and evaluating potential hazards, physical changes to the environment and indirect (off-site and cumulative) impacts that might result from implementation activities that may reasonably occur with the Plan.

The city's residents, businesses and other community members will greatly benefit from the involvement and technical assistance from the prospective Draft Environmental Impact Report ("EIR"). Therefore, what follows in this correspondence represents our agency's preliminary comments and recommendations. The city reserves the right to add, amend, change or replace comments and recommendations based on additional review and understanding of the Plan and the environmental analysis provided under the California Environmental Quality Act ("CEQA").

The city thanks SANDAG staff for meeting with city staff on Aug. 2, 2021, to discuss some of these comments in advance of this letter. Following that meeting, SANDAG provided language that they may recommend adding to the Regional Plan for additional clarification on land use authority. The language is, "Land use authority is reserved to local jurisdictions because they are best positioned to effectively implement the objectives outlined in the Plan through understanding of the unique needs of their communities and geographies." This language will be helpful to clarify that land use authority rests with

Transportation & Community Development Departments
1635 Faraday Avenue | Carlsbad, CA 92008 | 760-602-2710 t

City of Carlsbad Comments on Draft 2021 Regional Plan
 Aug. 6, 2021
 Page 2

the local jurisdiction. The city still offers the following comments with the intent to support development of a defensible and realistic regional plan.

SECTION 1: CLARITY AND OTHER CONSIDERATIONS

City staff have attended the series of workshops that SANDAG hosted during the public review period, and respectfully starts this section with several questions related to the process of the Plan and the Draft EIR. By way of introduction, a jurisdiction's General Plan, such as the city's General Plan, identifies the expected population of the city and any lands outside of the city limits but within their Sphere of Influence where future growth is anticipated to occur. The city's General Plan identifies the subject area adjacent to the McClellan-Palomar Airport for development under the designation for limited and light industrial use.

For future land use planning, land use assumptions must reasonably proxy and be generally consistent with local planning standards and programs, to be considered growth accommodating rather than growth inducing. SANDAG has the authority under Government Code Section 65584 to determine existing and projected housing needs, as well as the share of housing needs to be allocated to cities and counties, but it is unclear if SANDAG has jurisdiction to allocate new housing growth to areas in a manner not consistent with Government Code Section 65584. Attachment 1 includes additional information on the applicable Government Code and standards. Therefore, and as indicated above, the build-out of properties within the Business Park and flight activity zone must be done in accordance with the city's General Plan Land Use Diagram, as amended, in accordance with city approval.

The initial questions on the planning process associated with developing the Plan are provided below:

1. The SANDAG website states, "The SANDAG Sustainable Communities Strategy and Final EIR from its 2015 Regional Plan will remain valid and in compliance for purposes of state funding eligibility and other state and federal consistency purposes until the SANDAG Board of Directors adopts a new Regional Plan and EIR, provided those actions are completed by the end of December 2021." SANDAG needs to clarify how the Draft EIR, Response to Comments and Adoption will be completed this year and what will occur if they are not completed by the end of this year. Additionally, please clarify when the Draft EIR will be available; it is difficult to completely assess the full impacts of this plan when the public review of the documents is piecemealed.
 - a. SANDAG should clarify how public comments on the Plan are going to be addressed in the Draft EIR prior to its release.
 - b. In the Draft EIR, SANDAG needs to clearly articulate the impacts to land use and if the Plan will cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern appears to be inconsistent with the city's General Plan and rezone program to accommodate the Regional Housing Needs Assessment, as well as the general plans of other jurisdictions such as the cities of Coronado, Del Mar and the County of San Diego. The Draft EIR should clarify how implementation of this Plan can occur if those changes are not made.

City of Carlsbad Comments on Draft 2021 Regional Plan
 Aug. 6, 2021
 Page 3

2. The city has three mobility hubs, associated with the Employment Centers Published supporting the SANDAG Regional Plan.¹ McClellan-Palomar Airport is the fifth largest employment center in the region, with Carlsbad State Beach and Carlsbad Village as “Tier 3 and Tier 4” employment centers. The city thanks SANDAG for providing data for analysis to determine impacts and provide for accurate comments on the Plan. Attachment 2 shows a summary of the Mobility Hubs and housing units assumed in the Series 14 Growth Forecast for the year 2050. In summary:
 - a. The assumptions in the updated Series 14 Growth Forecast contain inconsistencies with the city’s General Plan. The Carlsbad Palomar Major Employment Mobility Hub does include increases in density beyond what the citywide numbers appear to show when they are looked at in more detail.
 - i. There are three locations in which density is shown to be inconsistent with good planning principles, the city’s General Plan and the Airport Land Use Compatibility Plan. The three most problematic areas (shown in Attachment 3) are:
 1. 736 units on parcels immediately adjacent to the McClellan-Palomar Airport runway. The location of the airport within this mobility hub was shared with SANDAG staff multiple times at workshops. This is inconsistent with the regulations provided by the San Diego County Regional Airport Authority and conflicts with standard planning principles for siting housing away from hazards.
 2. 2,755 units on existing developed resort properties and open space dedicated lands adjacent to Legoland.
 3. 65 units in a preserved open space area.
 - ii. SANDAG should provide additional detail why units were assumed in these areas, what planning principles those decisions were based on, and how SANDAG expects this to be implemented.
 - iii. Concentration of units in the mobility hubs alone appears to conflict with the direction received from the California Department of Housing and Community Development (“HCD”) to implement new Affirmatively Furthering Fair Housing (“AFFH”), which seeks to combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice and opportunity for all Californians. The allocations of land use provided by SANDAG seem to focus all the higher density housing into one area of the city. (This is one of the largest points of analysis that each jurisdiction in the region needs to respond to in order to receive a certified Housing Element.)
 - b. Additionally, looking at the detailed data provided by SANDAG, it is now clear why the citywide numbers only show moderate increases in population. Our analysis has shown that there is an assumed reduction of population by 2,310 persons in the areas within the city but outside of the mobility hubs. This is likely due to assumed reductions in persons per household over time, but SANDAG should clarify the source and reasonableness of this assumption. If housing is not provided consistent with these areas, is it still reasonable to assume persons per household will be reduced in 2050?

¹ SANDAG Website: Employment Centers [SANDAG :: PROJECTS :: San Diego's Regional Planning Agency](#)

City of Carlsbad Comments on Draft 2021 Regional Plan
 Aug. 6, 2021
 Page 4

- c. Furthermore, this reduction in population is not limited to the City of Carlsbad. There is an approximately 85,000 reduction in population assumed outside of mobility hubs regionwide. SANDAG needs to address if that is a reasonable assumption and if this will result in other impacts to public and private projects that will rely on this growth forecast, and the associated Activity Based Model (2+) to project future impacts to transportation, GHG, air quality and noise.
 - d. The forecast has decreased in future population based on current trends, but it is not clear if there is enough housing provided with reductions and increases in some jurisdictions. Will the reduced amount of housing that will be provided result in an increased exacerbation of the affordability crisis?
 - e. There is a lack of clarity about how the Plan would be implemented at the municipal level. SANDAG should develop an approach for engaging with municipalities to ensure local support for delivering the regional transportation network. Staff from local jurisdiction have the knowledge and ability to share where there are land use assumptions that conflict with planning and zoning laws. Our analysis focused on the City of Carlsbad, but if these types of assumptions are made regionwide, it presents flaws in the overall analysis. These flaws put the assumed reductions in vehicle miles traveled ("VMT") and ability to implement the Regional Plan into question.
3. The area designated is controlled for use and activity density and intensity through its spatial association with the McClellan-Palomar Airport. The McClellan-Palomar Airport is defined by the Federal Aviation Administration ("FAA") as a commercial service airport that, in addition to private aircraft, has regularly scheduled commercial flights to Los Angeles International Airport ("LAX"). The McClellan-Palomar Airport Land Use Compatibility Plan ("ALUCP") is prepared according to FAA requirements and adopted by the San Diego County Regional Airport Authority acting as the Airport Land Use Commission for the County of San Diego.
- a. The ALUCP provides measures to minimize the public's exposure to excessive noise and safety hazards within areas around the airport and identifies areas likely to be impacted by noise and flight activity created by aircraft operations at the airport. These impacted areas include the Airport Influence Area ("AIA"), the Clear Zone and the Flight Activity Zone.
 - b. Within the AIA, the ALUCP establishes six safety zones for the purpose of evaluating safety compatibility of new/future land use actions. The safety zone boundaries depict relative risk of aircraft accidents occurring near the airport and are derived from general aviation aircraft accident location data and data regarding the airport's runway configuration and airport operational procedures. The ALUCP limits development intensities in these zones by imposing floor area and lot coverage maximums, by incorporating risk reduction measures in the design and construction of buildings, and/or by restricting certain uses altogether. For example, all residential and virtually all non-residential uses are considered incompatible land uses in some zones, while considered to be either compatible or conditionally compatible with the airport in other zones. Attachment 4 shows the McClellan-Palomar Airport, noise contours and SANDAG's proposed housing units.
 - c. If the proposed SANDAG land use assumptions are endorsed, an amendment to the city's General Plan would be required to change the land use designation to Mixed-Use Commercial or residential land uses within the existing Business Park in order to effectuate the underlying assumptions of SANDAG staff. This is not a realistic

City of Carlsbad Comments on Draft 2021 Regional Plan
 Aug. 6, 2021
 Page 5

assumption. Further, the protected airspace referenced in the AIA and the ALUCP must also be amended based on SANDAG's regional planning assumptions. (The FAA establishes airspace protection zones in the airspace above and surrounding airports in order to protect aircraft from obstructions such as buildings, towers, etc. in navigable airspace.)

- d. When a General Plan is adopted or amended, the allowable growth pattern of an area is identified and the expansion or updating of the various land uses as specified in the General Plan can occur throughout the planning horizon. Without such growth considerations, the expansion or intensification of existing land uses could be considered "growth inducing." Unplanned and uncontrolled growth may have significant adverse impacts on the environment. CEQA requires a discussion of how a "project" could increase population, employment or housing growth in surrounding areas and the impacts resulting from this growth. The CEQA Guidelines indicate that a "project" would normally have a significant effect on the environment if it would induce substantial growth or a substantial concentration of population.
4. At this point, it is not clear if SANDAG's assumptions adequately contemplate the development patterns included in the Sustainable Communities Strategy ("SCS")/Regional Transportation Plan ("RTP"), and Regional Air Quality Strategy ("RAQS"), local climate action planning business-as-usual estimates, sub-regional traffic modeling, or the airspace assumptions of AIA and the ALUCP.
 5. The city seeks clarity on the Plan's underlying assumptions made to justify the proposed extensive high-speed rail network considering the significant changes in travel behavior which have occurred throughout the region as a result of the COVID-19 pandemic and due to the advancements in disruptive technologies such as telecommuting, autonomous vehicles, microtransit, etc.
 - a. Recent North County Transit District ("NCTD") Coaster ridership data show riders are not returning to riding the Coaster in comparison to other modes of travel as shown in Attachment 5.
 - b. This question is consistent with comments made by SANDAG's panel expert Bob Poole regarding the impact of the COVID-19 pandemic on transit ridership and mega-transit projects. (See comments by Bob Poole during the March 12, 2021 presentation to SANDAG starting at timestamp 1:30 p.m.: https://youtu.be/q-e6bNY5J_8?t=5410)
 6. The city seeks clarity on why an alternatives analysis was not conducted with consideration of other transit alternatives such as automated /shared vehicle technologies and personalized zero emissions transit programs that are capable of utilizing the existing regional freeway infrastructure in response to these recent developments explained in the above comment.
 7. The city seeks clarity on why the Plan does not incorporate policies to promote roundabouts over signalized intersections and include a budget line item under the Complete Corridors to fund the construction of roundabouts at new locations and to replace signalized intersections when found feasible. This clarification would support the Federal Highway Administration ("FHWA")'s project for [Accelerating Roundabout Implementation in the United States](#) and the [County of San Diego Air Pollution Control Board's support for implementing roundabouts to address GHG and reduce fatalities](#).
 8. The city seeks clarity on the project phasing proposed within the Plan. Specifically, the city is seeking to understand the timing of implementation of unfunded TransNet projects related to

City of Carlsbad Comments on Draft 2021 Regional Plan
 Aug. 6, 2021
 Page 6

the new projects presented within the Regional Plan. To support this, the city is requesting that SANDAG input the information requested in Table 1 (Attachment 6).

9. The city seeks specific data on the proposed 200 miles of rail service contemplated in the Plan. To support this, the city is requesting that SANDAG input the information requested in Table 3 (Attachment 7). Specific questions:
 - a. Please provide more information about the scope of the high-speed rail alignments, potential vehicle technologies and their cost estimates.
 - b. Will the Coaster keep the same rail alignment?
 - c. What funding is programmed or planned for the Carlsbad Village railroad trench and the other projects along the current NCTD/Coaster Service right-of-way?
 - d. Will some of the tracks be at grade with fencing and trains traveling at 110 miles per hour speeds?

SECTION 2: COMMENTS AND RECOMMENDATIONS

In addition to the comments on process and the Draft EIR provided above, city staff remain concerned that there is not enough detail on the feasibility of implementation of this significant shift in transportation strategy. On specific content in the plans, we outline our recommendations and comments below:

1. *Paying for the Plan:*

The draft 2021 Regional Plan sets out an ambitious plan to build and operate a region-wide system of transportation projects, programs and other improvements. This is a substantial role for SANDAG to play in supporting both the construction and operation of these projects, programs and other improvements. SANDAG should set annual revenue targets to directly fund everything and should approve any recommended sustainable revenue tools to help meet these targets. Many of the funding strategies will require legislative changes, or voter-approved taxation. SANDAG should clarify what will occur if the funding is not available, if opposition to projects stops them from construction, and if General Plans in the region are not modified to implement the Plan.

2. *Appendix D: Sustainable Community Strategy Documentation:*

Appendix D includes the Sustainable Communities Strategy, which outlines assumptions included in the Activity Based Model 2+ ("ABM 2+"), updated for this. This model will be necessary for use by publicly and privately initiated land use projects preparing documents for consistency with VMT/CEQA Guidelines and Traffic Impact Analysis ("TIA") Evaluations. City staff respectfully request direction from SANDAG on how to conduct modeling with the service bureau and how to factor in these assumptions applied to ABM 2+. Specifically, the addition of pricing, parking costs for coastal communities, 10% teleworking and micromobility. SANDAG should provide direction on how this could be worked into General Plans that are updated every 5-20 years.

3. *Appendix A: Transportation Projects, Programs, and Phasing:*

Trips to and from school sites result in a significant congestion, VMT generation, and peak hour delay throughout the region. Additional funding and projects should be recommended with a specific focus on improving safety and multimodal access in and around school sites along with programs to incentivize non-single occupancy vehicle trips to schools.

City of Carlsbad Comments on Draft 2021 Regional Plan
 Aug. 6, 2021
 Page 7

Table A.11: Given the proven success of the Carlsbad Connector microtransit pilot program, the city agrees with the Plan's recommendations to provide similar on-demand microtransit systems throughout North County at all mobility hub sites and major transit centers.

Table A.13: The segment of El Camino Real between Poinsettia Lane and Camino Vida Roble is proposed to be widened from two to three lanes to prime arterial standards. With the adoption of the city's General Plan, the city has determined that the widening of this portion of El Camino Real is not feasible due to constrained right-of-way and would result in negative impacts to other travel modes. City staff recommend removal of this proposed project recommendation CB32 (that is, a 'do nothing' scenario, or appraise and evaluate different mobility projects and/or alternative designs).

The preferred Interstate-5 freeway alternative identified in the North Coast Corridor ("NCC") Final EIR/EIS is the refined 8+4 Buffer alternative, with four freeway lanes and two managed lanes in each direction and completion by 2035. Appendix A, Table A.5 describes NCC project IDs CC004, 007 - 009 as "8F to 6F+4ML" with completion by 2050. While this might lead to further study, it is not clear why there is a different freeway configuration (i.e., reduction in freeway lanes) proposed. How does a reduction in lanes continue to meet NCC potential project benefits of maintaining or improving traffic operations and improving the safe and efficient regional movement of people and goods?

4. *Active Transportation:*

The city appreciates the Regional Plan's overall approach of providing a connected network of high-quality bicycle facilities throughout the region. Regional bikeways are recommended throughout the city including along Palomar Airport Road which will provide a key east-west connection and El Camino Real which will provide a new north-south bikeway connection through the city. Both roadways are proposed to include "on-street bikeways". Due to the high traffic volumes and vehicle speeds experienced along most of both corridors, the city recommends considering "off-street bikeways" or Class I facilities where feasible in order to stimulate the shift from personal motor vehicle use to people choosing to bike.

It is extremely important that municipal transportation plans align with regional transportation plans to achieve regional goals for land use and transportation and to promote the region working together to build a cohesive regional transportation network. Considering there are currently no mechanisms in place to ensure municipalities coordinate local transportation plans with regional planning documents, the Plan should provide an approach on how SANDAG plans to engage with municipalities, especially in areas of potential disagreement or conflict (as aforementioned in this subsection and others). It is also recommended that the Plan provide additional direction regarding the application of protected bikeways in a variety of applicable contexts. While vertical measures such as soft hit posts may be appropriate in lower volume and lower speed roadways, arterial roadways with high traffic volumes and high speeds warrant much more substantial physical protection from vehicles. In addition, special consideration should be given at intersections and driveways which may be impacted due to the additional width and visibility impacts created by protected bikeways.

City staff look forward to working with SANDAG on improving mobility and land use access in the region and building sustainable, equitable and healthy modes of transportation, and we appreciate the opportunity to comment on the Plan that will help the region realize these goals.

City of Carlsbad Comments on Draft 2021 Regional Plan
Aug. 6, 2021
Page 8

If you have any questions related to comments on the transportation network, please contact Tom Frank, Transportation Director/City Engineer, at Tom.Frank@carlsbadca.gov or if you need additional information related to comments on the land use assumptions, please contact Eric Lardy, Principal Planner, at Eric.Lardy@carlsbadca.gov.

Sincerely,



For

JEFF MURPHY
Community Development Director



TOM FRANK
Transportation Director/City Engineer

Attachments:

1. Government Code 65020 (S.B. 375) Summary
2. City of Carlsbad Mobility Hubs
3. City of Carlsbad – Palomar Airport Road Mobility Hub Analysis
4. Palomar-McLellan Airport Flight Paths
5. Recent NCTD Coaster Ridership Data
6. Table 1 - Project Data Request
7. Table 3 - Detail of Proposed Rail Lines

cc: Scott Chadwick, City Manager
Celia Brewer, City Attorney
Geoff Patnoe, Assistant City Manager
Ron Kemp, Assistant City Attorney
Robby Contreras, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public Works
Mike Strong, Assistant Director, Community Development
Don Neu, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Lardy, Principal Planner
Scott Donnell, Senior Planner
Corey Funk, Associate Planner

Attachment 1: Government Code 65020 (S.B. 375) Summary

Government Code section (“GOV §”) 65080, also referred to as California Senate Bill 375 (Steinberg, 2008) (“SB 375”), is one area of law that provides SANDAG with guidance to which a regional transportation plan must be developed.

Among other things, the regional transportation plan that is developed “shall be an internally consistent document” (GOV § 65080 (b)) and shall include a “sustainable communities strategy prepared by each metropolitan planning organizations as follows” (GOV § 65080 (b)(2)(B)):

Each metropolitan planning organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to utilize the most recent planning assumptions considering local general plans and other factors. The sustainable communities strategy shall (i) identify the general location of uses, residential densities, and building intensities within the region, (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth, (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to [Section 65584](#), (iv) identify a transportation network to service the transportation needs of the region, (v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in [subdivisions \(a\) and \(b\) of Section 65080.01](#), (vi) consider the state housing goals specified in [Sections 65580 and 65581](#), (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act ([42 U.S.C. Sec. 7506](#)).

The 2021 draft Regional Transportation Plan includes a Sustainable Communities Strategy (“SCS”), as required by SB 375 for the San Diego region (herein after called “draft Regional Plan”). The draft Regional Plan indicates that “SB 375 requires the SCS to include a pattern for forecasted growth and development that accomplishes the following: 1) When combined with the transportation network, the SCS will achieve the regional GHG emission–reduction targets; 2). The SCS accommodates the Regional Housing Needs Assessment (“RHNA”) Determination; and 3) The SCS utilizes the most recent planning assumptions. (Reference p. 19 of the 2021 Regional Plan.)

Predicting the effect of transportation plans or projects on land uses and land use planning is critical to developing context sensitive solutions for transportation projects. Therefore, utilization of the most recent planning assumptions is not only necessary but is required as specifically stated therein GOV § 65080. If inconsistencies are found in the land use assumptions or adverse impacts are anticipated, SANDAG should be actively engaged in the development of measures to address these issues.

The SANDAG Board of Directors approved the final RHNA plan with the final housing unit allocation on July 10, 2020, which was based on the most recent land use planning assumptions and an adopted methodology to allocate housing in accordance with GOV §§ 65584.04(d and m). The City of Carlsbad received a total RHNA allocation of 3,873 units as a result of RHNA plan adoption. The adopted April 6, 2021 city’s Housing Element accommodates its housing needs through current zoning and other programs

Attachment 1: Government Code 65020 (S.B. 375) Summary

as needed to meet the city's RHNA obligation at all income levels. The land use inputs derived from this local planning document constitutes the most recent land use assumptions. On July 13, 2021 the Department of Housing and Community Development found "the adopted housing element is in substantial compliance with State Housing Element Law (Article 10.6 of the Gov. Code).

The most recent planning assumptions are critical for the development of the draft Regional Plan as the document must comply with other specific state and federal mandates including a SCS per California Senate Bill 375, which achieves GHG emissions reduction targets set by the California Air Resources Board and compliance with federal civil rights (Title VI) requirements, environmental justice considerations, air quality conformity, and public participation. To monitor compliance and attainment of state reduction goals in GHG, GOV § 65080 (b)(2)) requires that:

(H) Prior to adopting a sustainable communities strategy, the metropolitan planning organization shall quantify the reduction in greenhouse gas emissions projected to be achieved by the sustainable communities strategy and set forth the difference, if any, between the amount of that reduction and the target for the region established by the state board.

(J)(i) Prior to starting the public participation process adopted pursuant to subparagraph (F), the metropolitan planning organization shall submit a description to the state board of the technical methodology it intends to use to estimate the greenhouse gas emissions from its sustainable communities strategy and, if appropriate, its alternative planning strategy.

There is inevitably some uncertainty regarding the use of projected future conditions. However, what is certain is that the project will not operate under the conditions that exist today. There will be new residential and employment growth in the intervening years between now and the proposed build-out of the draft Regional Plan. Nonetheless, projections utilized should represent the best available information assembled by the local agencies with jurisdiction and expertise. Judgments about land use assumptions utilized in the draft Regional Plan should be based on and supported by facts, adopted plans, and "most recent planning assumptions," rather than speculation and personal opinions. The land use assumptions for "uses, residential densities, and building intensities within the region" (as required by GOV § 65080 (b)(2)(B)(i)) should also be the same, as that provided to the state board (as required per GOV §§ 65080 (b)(2)(H and J) in estimating and analyzing GHG from the SCS and the effect on growth and whether the effects of that growth would be significant in the context of the region's plans, natural setting, and growth patterns. Ultimately, the SCS must demonstrate whether SANDAG can meet the per capita passenger vehicle-related GHG emissions targets for 2035 set by the California Air Resources Board ("CARB").

SB 375 directs CARB to accept or reject the determination of SANDAG that its SCS submitted to CARB would, if implemented, achieve the region's GHG emissions reduction targets. CARB's technical evaluation of SANDAG's draft Regional Plan would be based on all the evidence provided, including the models, the data inputs and assumptions, the SCS strategies, and the performance indicators.

The transportation and planning assumptions are also extremely important as it is relied on for other master planning exercises. The Regional Air Quality Strategy ("RAQS") relies on information from CARB and SANDAG for information regarding projected growth in the cities and San Diego County. This in turn is utilized to address other state requirements, including the San Diego portion of the California State Implementation Plan ("SIP") and promulgating their own rules and regulations regarding air quality in the region or to address federal requirements.

Attachment 1: Government Code 65020 (S.B. 375) Summary

The analysis of land use impacts for transportation projects is guided by FHWA Technical Advisory T 6640.8 and the CEQA Guidelines.

Under the FHWA Technical Advisory T 6640.8 (G)(1), Guidance for Preparing and Processing Environmental, states:

This discussion [of land use] should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the proposed project. These plans and policies are normally reflected in the area's comprehensive development plan, and include land use, transportation, public facilities, housing, community services, and other areas.

The land use discussion should assess the consistency of the alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan required by Section [23 U.S. Code §] 134. The secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for each alternative, including adverse effects on existing communities. Where possible, the distinction between planned and unplanned growth should be identified.

There is also a requirement to analyze the land use planning inconsistencies per CEQA Guidelines § 15126.2(a), which specifies that an EIR for a proposed project include:

The Significant Environmental Effects of the Proposed Project. An EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. The EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example, the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas.

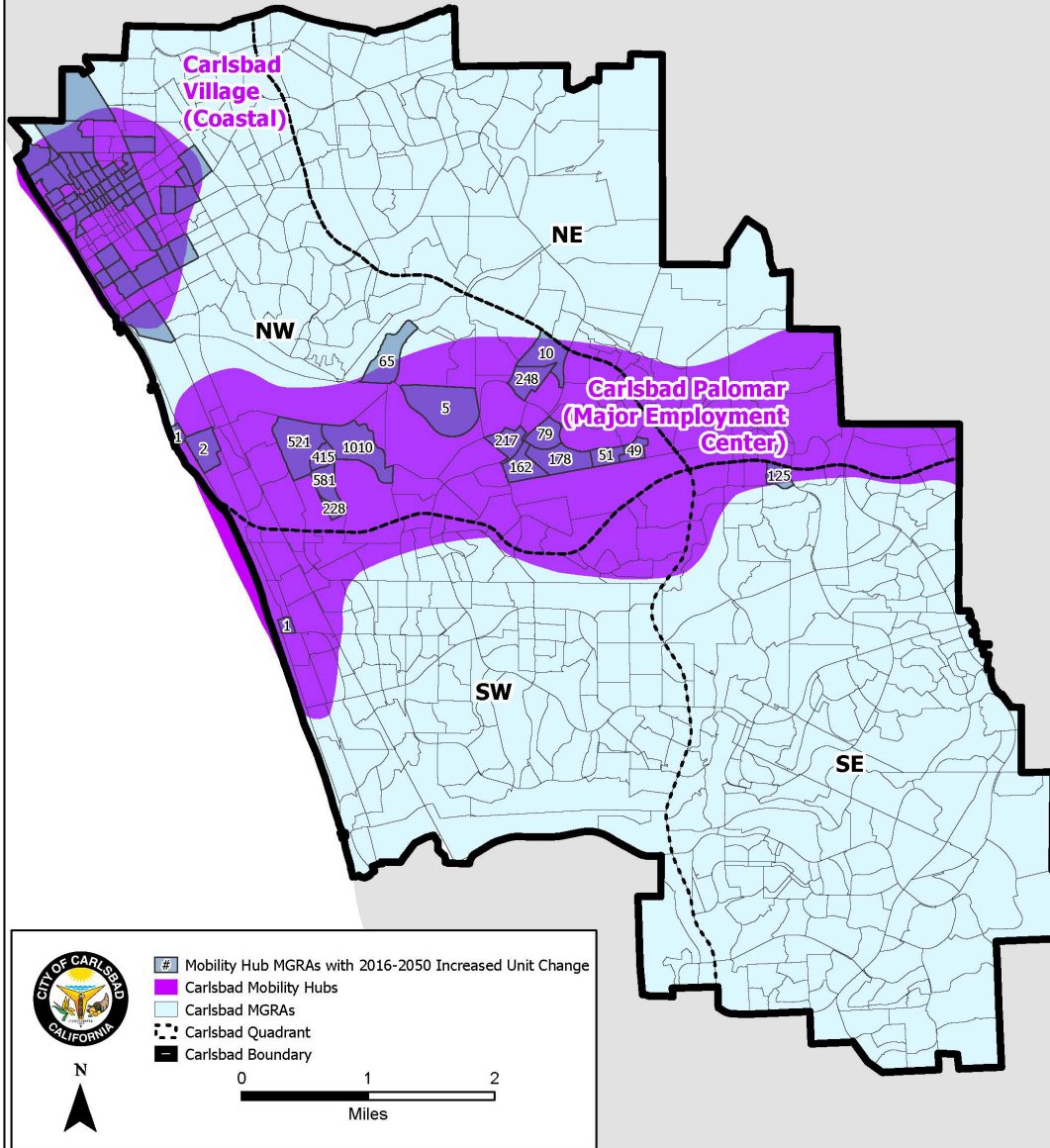
Since the new land use assumptions are being utilized, as described by this letter, the EIR that is prepared shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected. The following are the basic steps in analyzing land use impacts as part of the community impact assessment process:

Attachment 1: Government Code 65020 (S.B. 375) Summary

1. Inventory the existing land use patterns (including undeveloped land), development trends, and transportation systems. The inventory of existing land uses should include the following land use types: residential, commercial, industrial, recreational, institutional, public services, community services, emergency services, transportation, utilities, agriculture, and undeveloped land in the study area. The study area should include the surrounding community that is generally associated with the project area within which community impacts could occur. The inventory should also address development trends and identify recent developments in the study area to include the development's name, size, status (planned, built, under construction), and the jurisdiction in which it is located. A map showing the location of existing and planned land uses in the area should also be prepared.
2. Determine whether the project is consistent with local and regional policies that govern land use and development. For the consistency analysis, the policies and programs considered in the analysis should include: transportation plans and programs (MTPs/RTPs and MTIPs/RTIPs), regional growth plans, local General Plans that establish land use and growth management policies for the study area, and any specific or pipeline development proposals. This analysis should also include a discussion of consistency with the Coastal Zone Management Act of 1972, California Coastal Act of 1976, the National Wild and Scenic Rivers Act (16 USC 1271) and the California Wild and Scenic Rivers Act (Pub. Res. Code § 5093.50 et seq.). After preparing a preliminary list of relevant plans to be considered in the analysis, the SANDAG planner should meet with the staff of the various agencies to review the list to determine if it is complete and revise the list as necessary.
3. Assess the changes that would occur in land uses and growth with and without the project.
4. The draft Regional plan and each project alternative should be considered separately since the results may be different.
5. Develop measures to avoid, minimize, and/or mitigate potential adverse effects.

The resulting environmental analysis should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the proposed project. These plans and policies are normally reflected in local General Plans. If found to be consistent, then the findings in the EIR should be documented in the report and no further analysis or action is necessary. When found not to be inconsistent with a policy or program, then consideration must be given to modifying the draft Regional Plan alternative to make it consistent, or measures to address the inconsistency must be developed. SANDAG should be actively engaged in the development of measures to address these issues and be prepared to assess the consistency of the draft Regional Plan and alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan required by Section 23 U.S. Code § 134. For any new land use growth assumptions, the secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for the draft Regional Plan and each alternative, including adverse effects on existing communities. The results should be shared with the public during the public involvement process, e.g., at community meetings, etc. Public input should be considered by SANDAG and if necessary, the findings of the analysis should be revised to reflect information gained through the public involvement process.

SANDAG Mobility Hubs

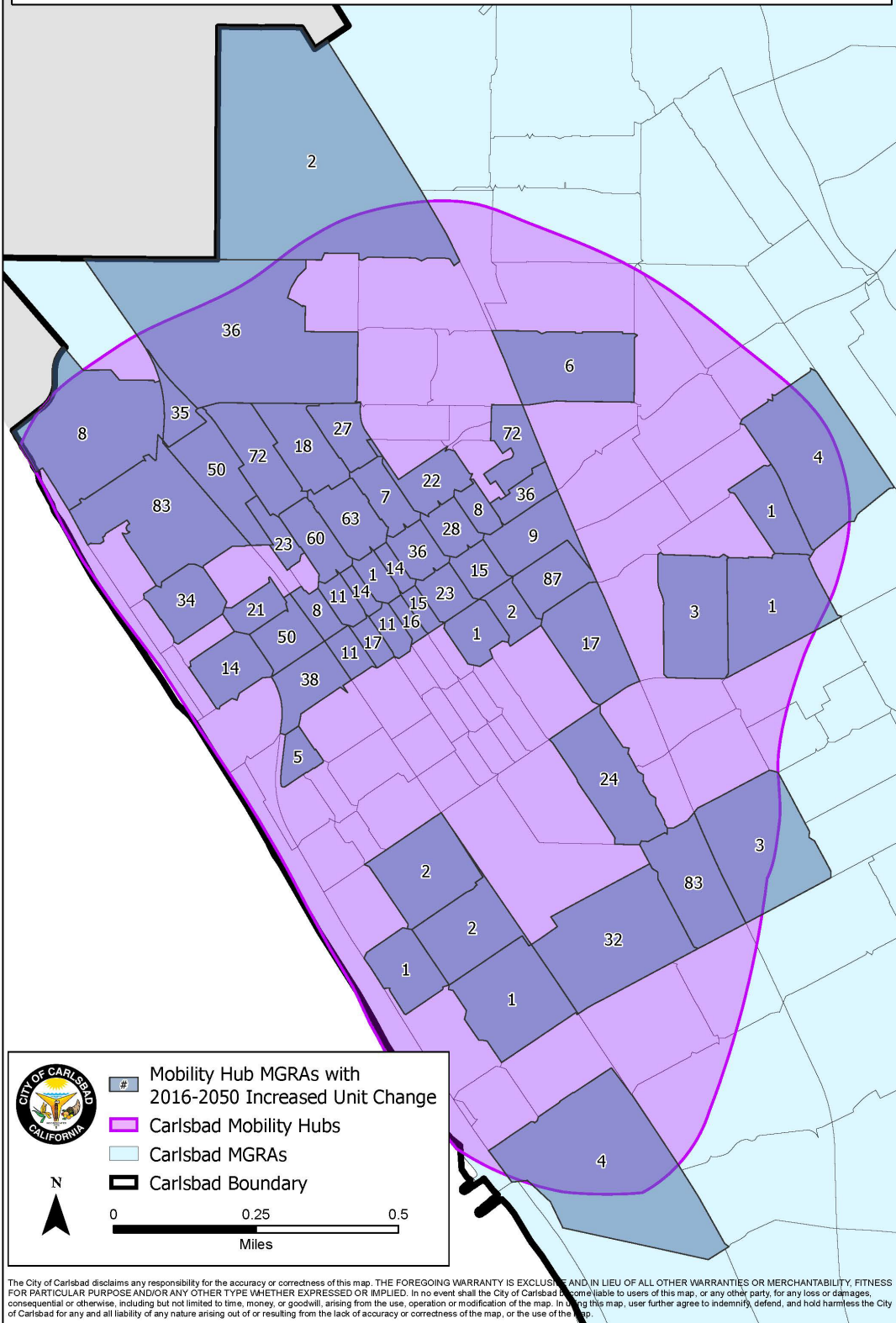


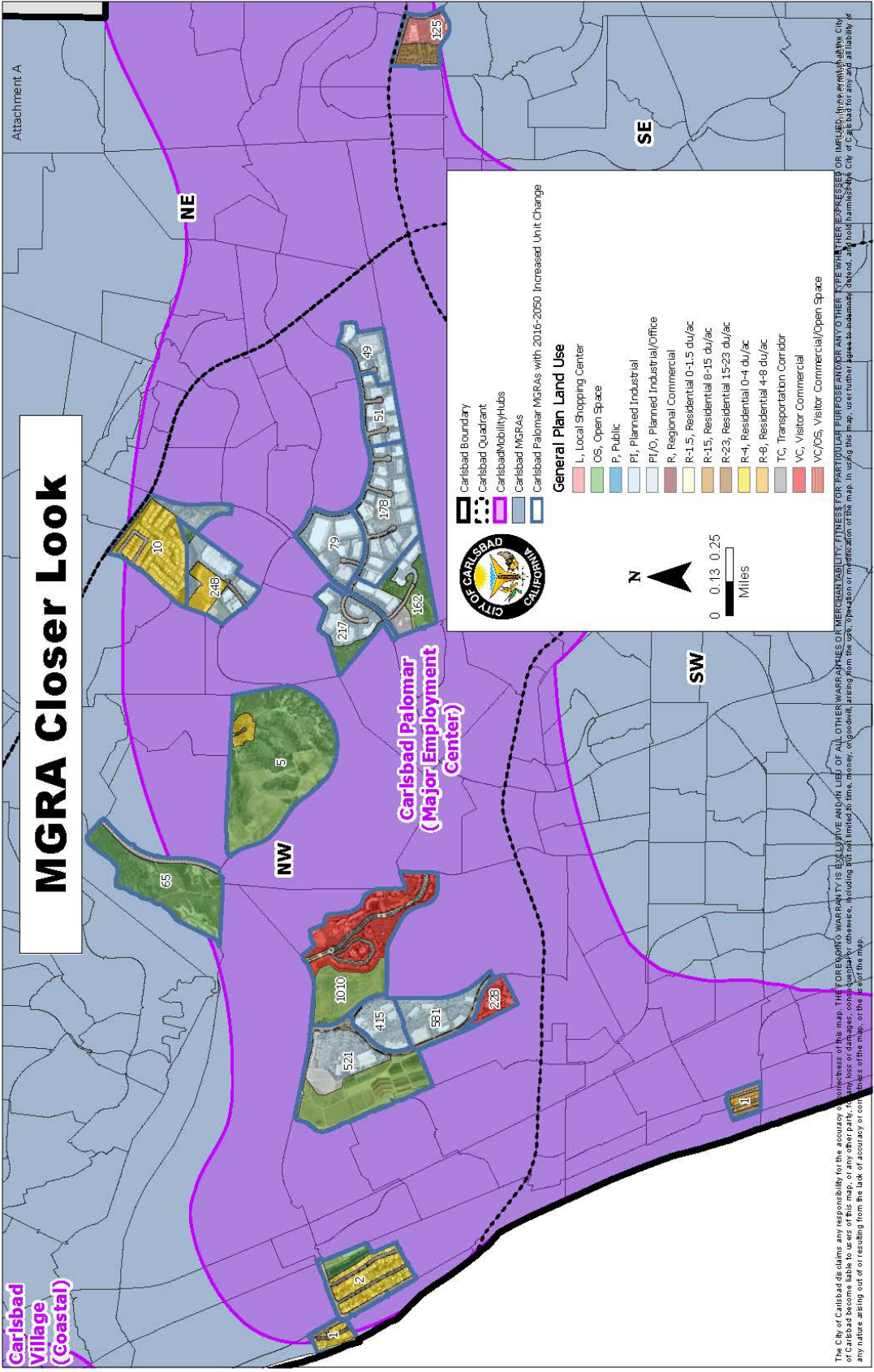
Hub Name	Hub Type	Total Population 2016	Total Houses 2016	Total Population 2025	Total Houses 2025	Total Jobs 2025	Total Population 2035	Total Houses 2035	Total Jobs 2035	Total Population 2050	Total Houses 2050	Total Jobs 2050
Carlsbad Village	Coastal	14087	6430	15095	6539	9290	16177	7075	9667	17293	7607	10044
Carlsbad Palomar	Major Employment Center	12853	5475	12275	5461	61074	19465	8503	67005	21080	9265	72900
N/A	Outside of Hubs	86239	34247	88793	35855	13896	84039	35855	14345	83929	35855	14900
N/A	All of Carlsbad	113179	46152	116163	47855	84260	119681	51433	91017	122302	52727	97844

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Carlsbad Village Mobility Hub MGRAs





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**Carlsbad Palomar
(Major Employment
Center)**

2 Unit Change

1 Unit Change

R-4

OS



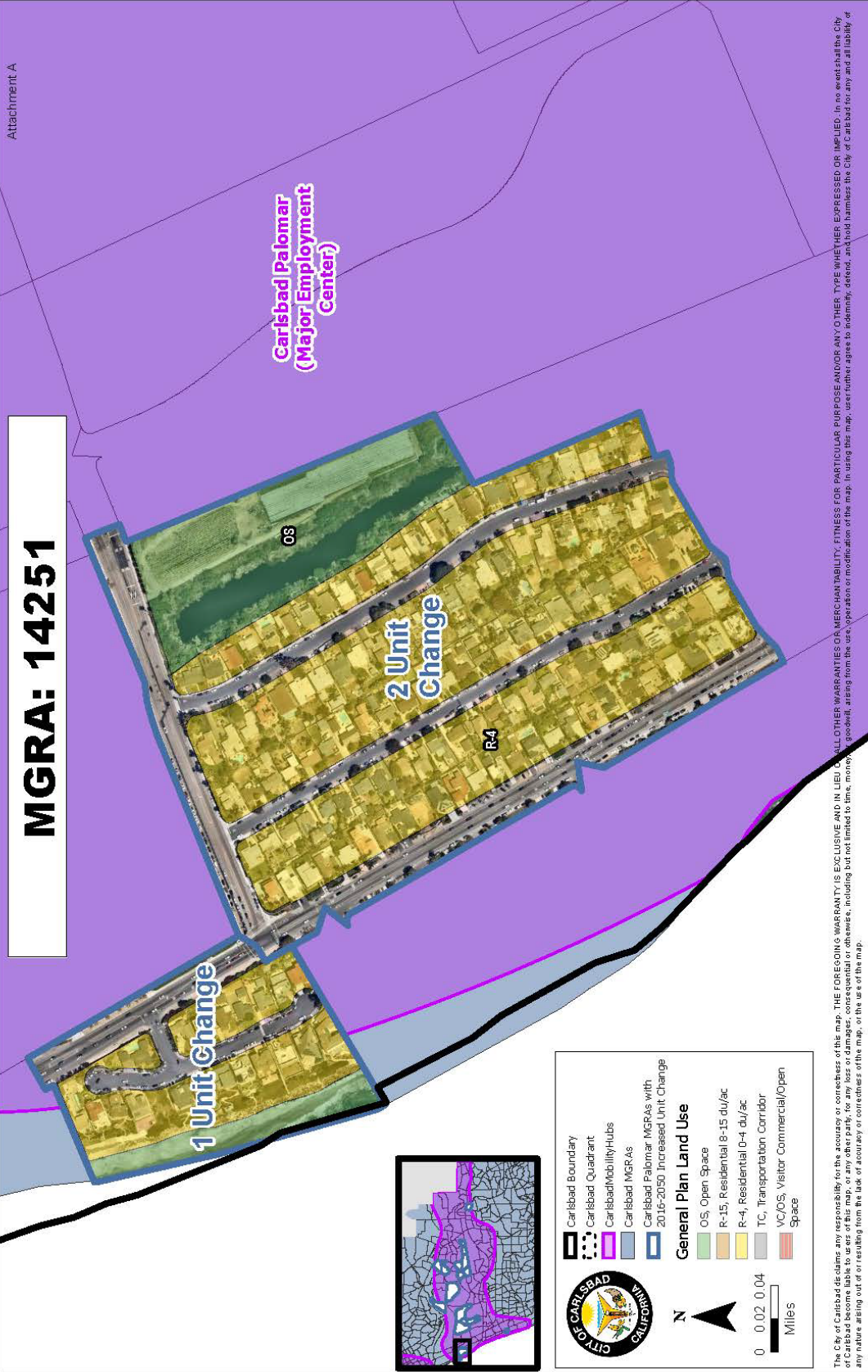
- Carlsbad Boundary
- Carlsbad Quadrant
- Carlsbad Mobility Hubs
- Carlsbad MGRAs
- Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change

General Plan Land Use

- OS, Open Space
- R-15, Residential 8-15 du/ac
- R-4, Residential 0-4 du/ac
- VC/OS, Visitor Commercial/Open Space

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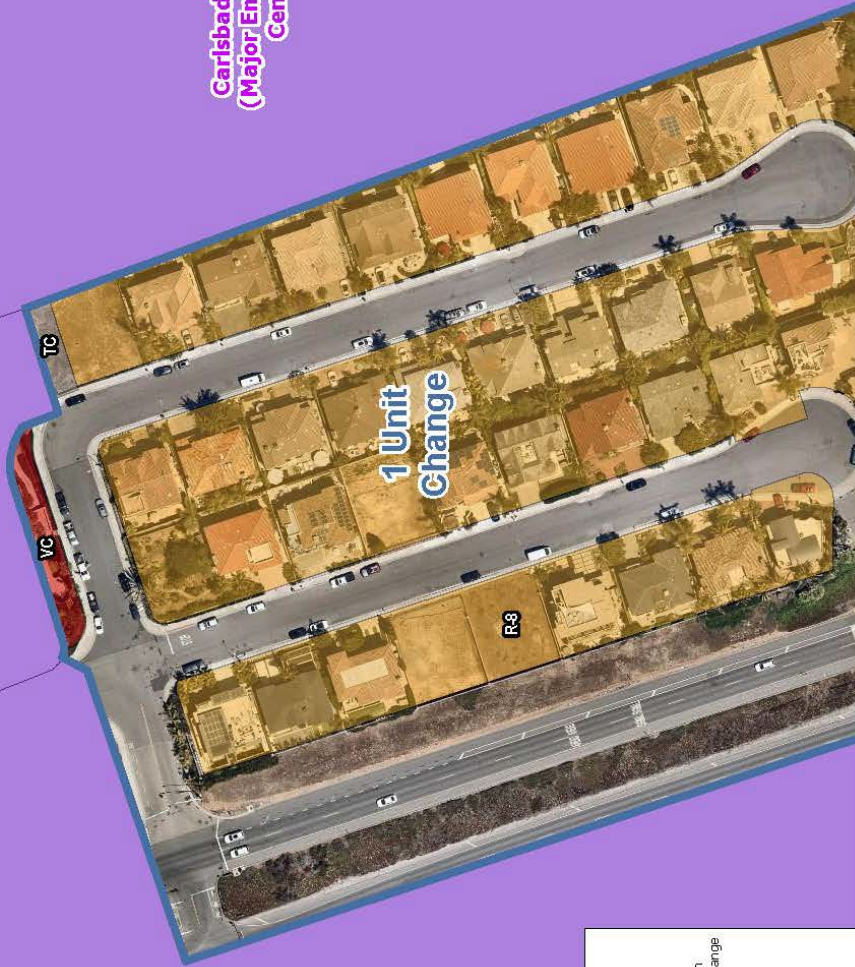


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**Carlsbad Palomar
(Major Employment
Center)**



- Carlsbad Boundary
- Carlsbad Quadrant
- Carlsbad Mobility Hubs
- Carlsbad MGRAs
- Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change

General Plan Land Use

- OS, Open Space
- R-8, Residential 4-8 du/ac
- TC, Transportation Corridor
- VC, Visitor Commercial


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


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


**Carlsbad Palomar
(Major Employment
Center)**

**125 Unit
Change**

-  Carlsbad Boundary
-  Carlsbad Quadrant
-  Carlsbad Mobility Hubs
-  Carlsbad MGRAs
-  Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change

General Plan Land Use

-  L, Local Shopping Center
-  PI, Planned Industrial
-  R-23, Residential 15-23 du/ac

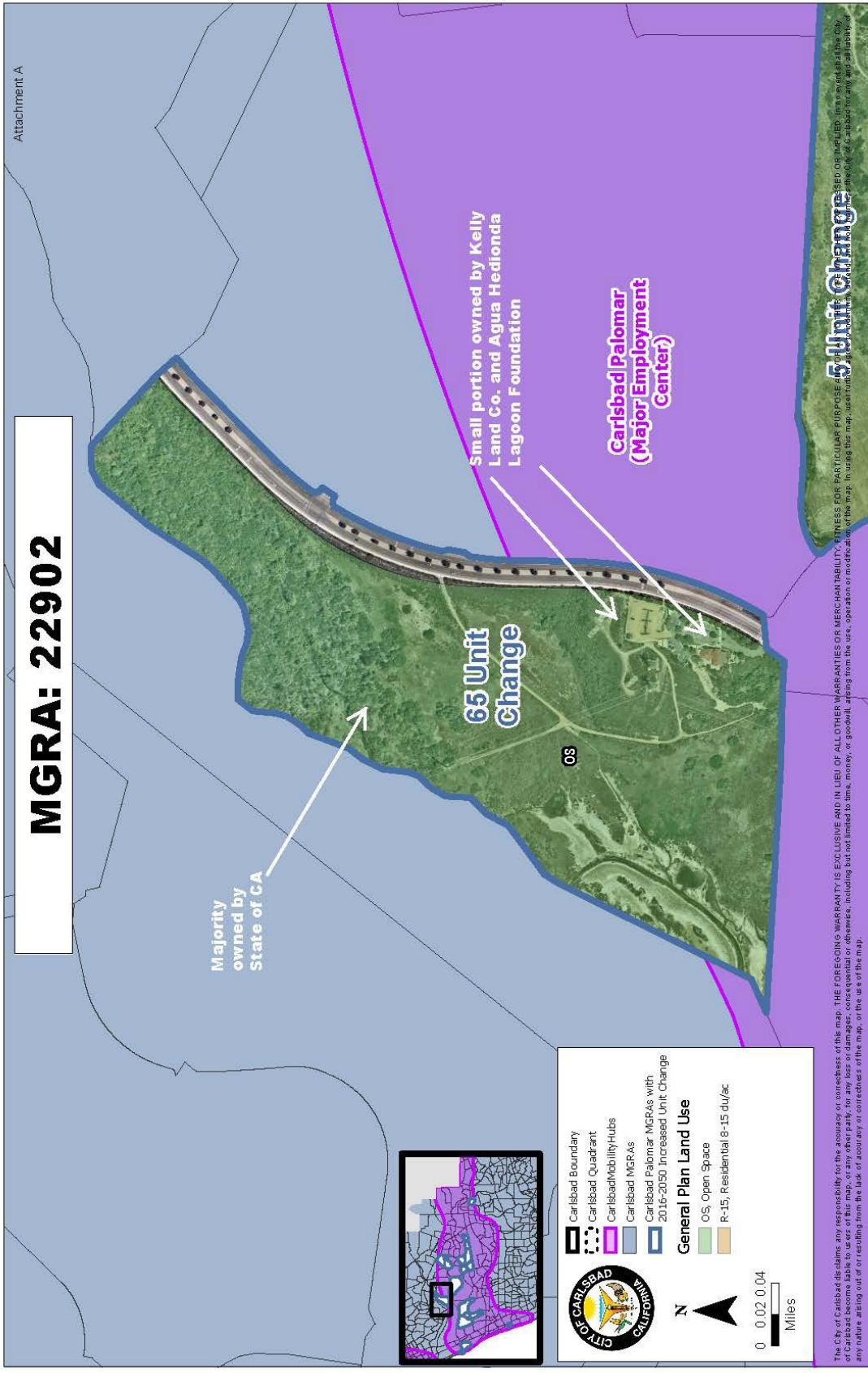
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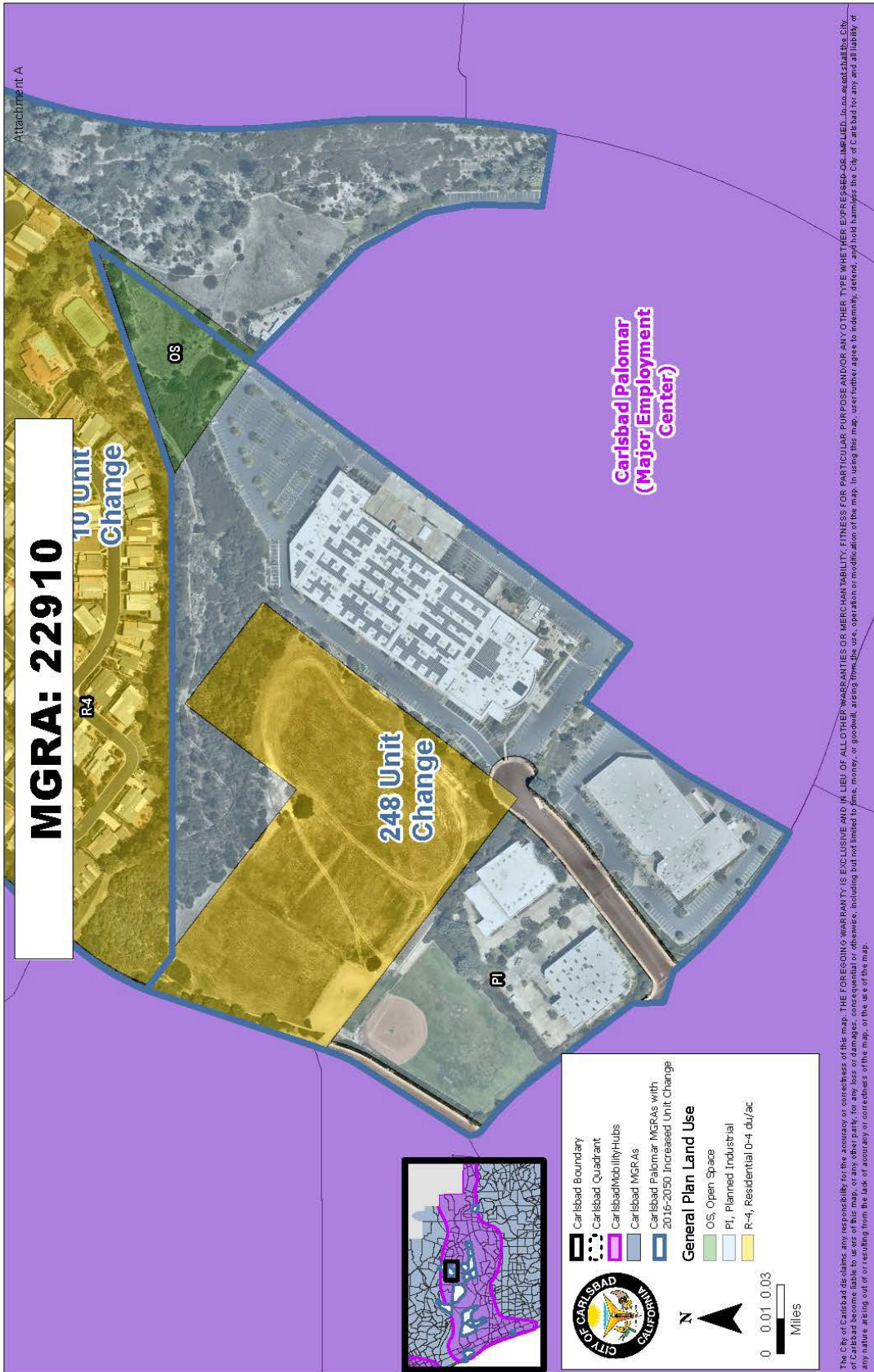
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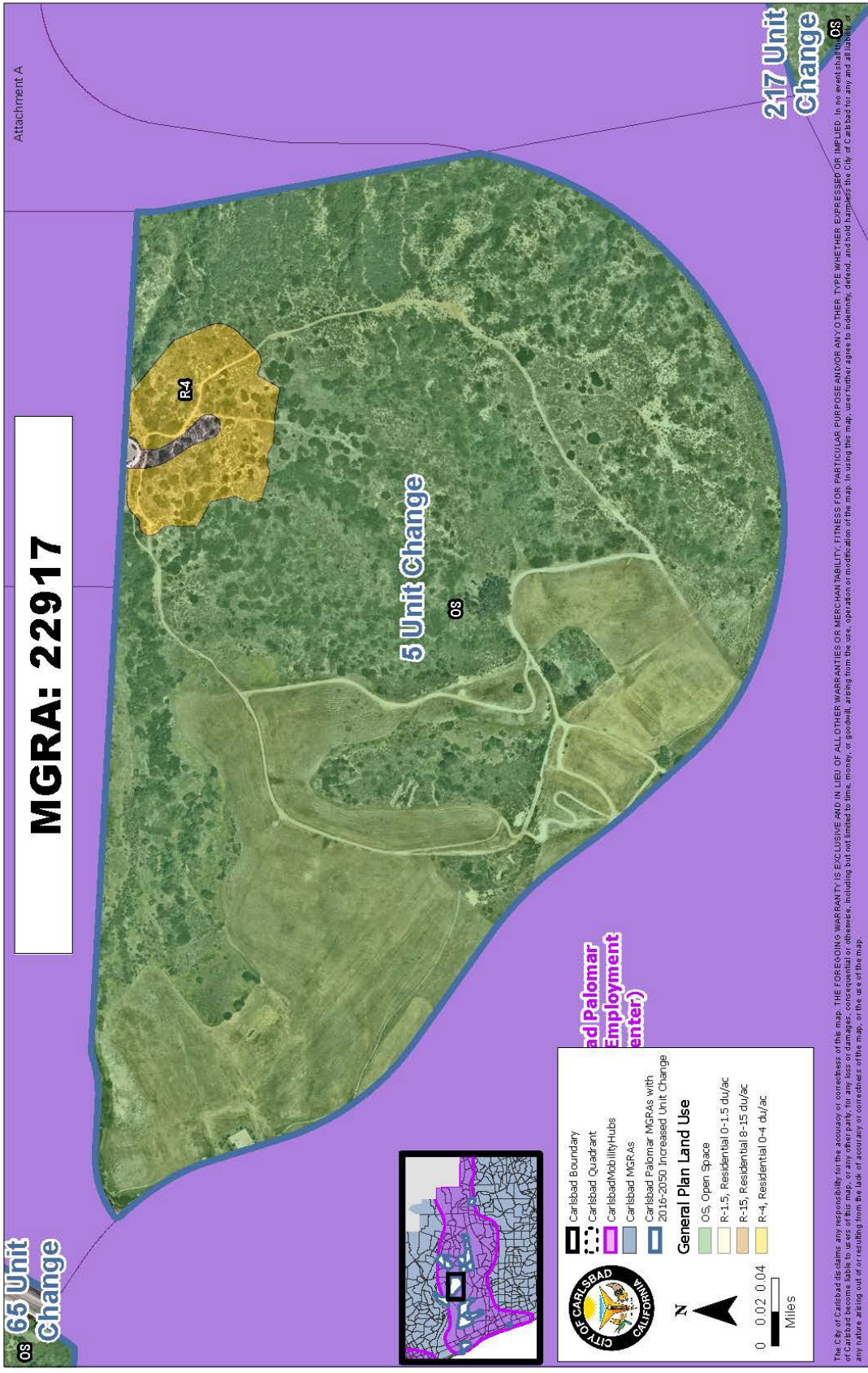
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Scale: 1/4" = 100' GIS App Project: 04/01/2015 Content: 04/14/2015 11:45:00 AM 2/15/2015 04:05:45 AM



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MGRA: 22917

217 Unit Change

5 Unit Change

65 Unit Change

Palomar Employment Center

CITY OF CARLSBAD

- Carlsbad Boundary
- Carlsbad Quadrant
- Carlsbad Mobility Hubs
- Carlsbad MGRAs
- Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change

General Plan Land Use

- OS, Open Space
- R-1.5, Residential 0-1.5 du/ac
- R-15, Residential 8-15 du/ac
- R-4, Residential 0-4 du/ac

0 0.02 0.04 Miles

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MGRA: 22926

Owned by Gemological Institute of America

Owned by CB Ranch Enterprises


Carlsbad Palomar Employment Center

OS 1010 Unit Change

415 Unit Change

581 Unit Change

521 Unit Change

- Carlsbad Boundary
- Carlsbad Quadrant
- Carlsbad Mobility Hubs
- Carlsbad MGRAs
- Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change

General Plan Land Use

- OS, Open Space
- PI, Planned Industrial
- R, Regional Commercial
- VC, Visitor Commercial

0 0.03 0.05 Miles

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MGRA: 22928

Owned by M and A Gabae

Carlsbad Palomar (Major Employment Center)

Owned by Grand Pacific Carlsbad LP
VC designation does not allow residential uses

1010 Unit Change OS

415 Unit Change

521 Unit Change



- Carlsbad Boundary
- Carlsbad Quadrant
- Carlsbad Mobility Hubs
- Carlsbad MGRAs
- Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change

General Plan Land Use

- OS, Open Space
- PI, Planned Industrial
- VC, Visitor Commercial

0 0.02 0.04 Miles

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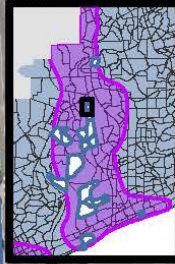

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Scale: 1:60,000 (Scale varies with zoom)

MGRA: 22931

Carlsbad Palomar
(Major Employment
Center)

49 Unit
Change

- Carlsbad Boundary
- Carlsbad Quadrant
- Carlsbad Mobility Hubs
- Carlsbad MGRAs
- Carlsbad Palomar MGRAs with 2016-2050 Increased Unit Change

General Plan Land Use

- Planned Industrial

0 0.01 0.02 Miles

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MGRA: 22937



**Carlsbad Palomar
(Major Employment
Center)**

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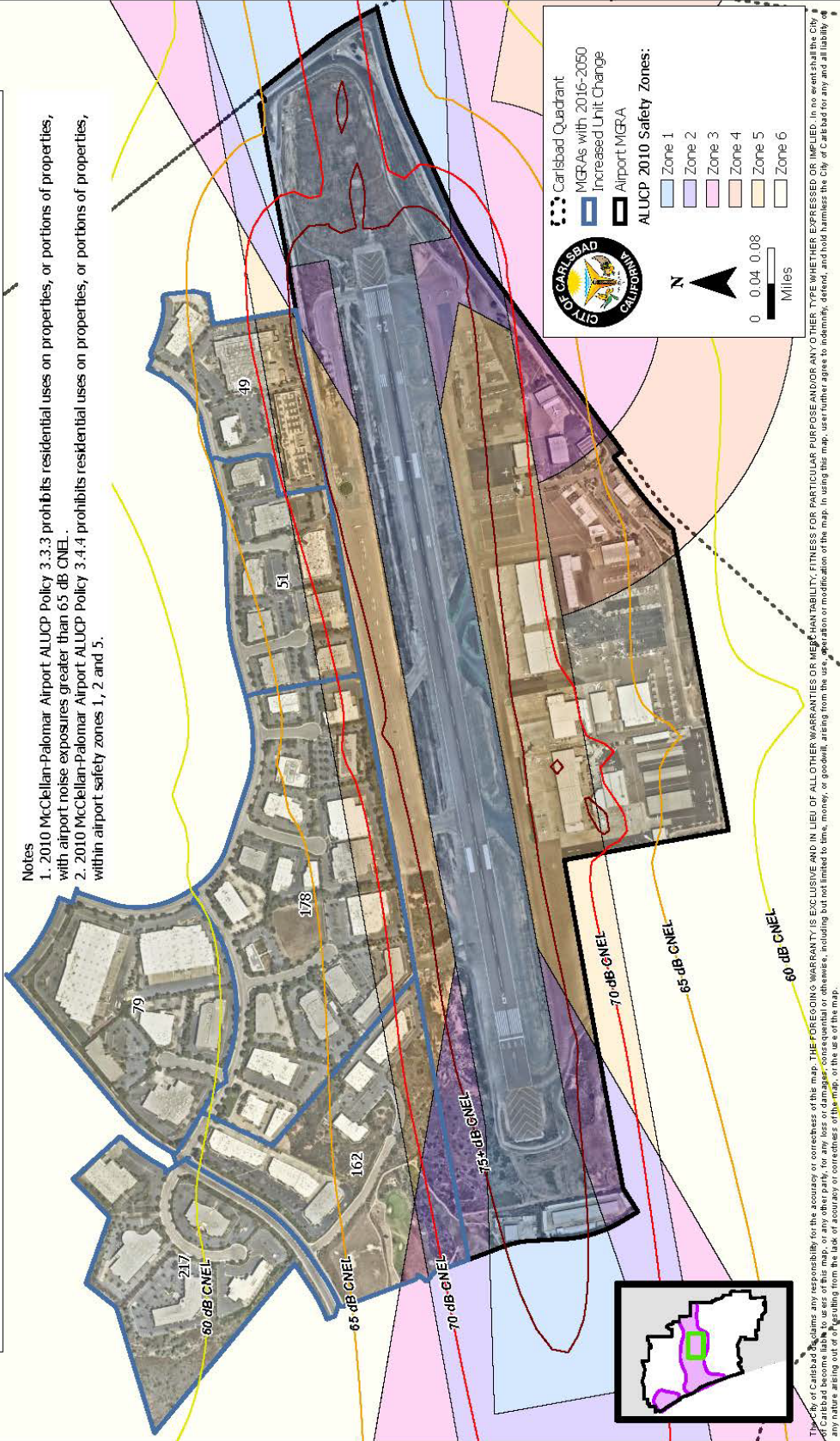
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Carlsbad Palomar Mobility Hub MGRAs Near Airport

Notes

1. 2010 McClellan-Palomar Airport ALUCP Policy 3.3.3 prohibits residential uses on properties, or portions of properties, with airport noise exposures greater than 65 dB CNEL.
2. 2010 McClellan-Palomar Airport ALUCP Policy 3.4.4 prohibits residential uses on properties, or portions of properties, within airport safety zones 1, 2 and 5.



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PLEASE NOTE: PRELIMINARY RIDERSHIP DATA - UNAUDITED AND SUBJECT TO ADJUSTMENTS

Month	COASTER - TOTAL RIDERSHIP			
	FY21	FY20	Variance	%
July	10,263	149,515	(139,252)	(93.1%)
Aug	9,412	133,482	(124,070)	(92.9%)
Sept	10,020	114,233	(104,213)	(91.2%)
Oct	10,968	111,045	(100,077)	(90.1%)
Nov	9,232	94,551	(85,319)	(90.2%)
Dec	7,519	83,951	(76,432)	(91.0%)
Jan	6,848	98,791	(91,943)	(93.1%)
Feb	7,866	91,845	(83,979)	(91.4%)
Mar	11,203	46,510	(35,307)	(75.9%)
Apr	15,184	5,244	9,940	189.5%
May	19,214	6,207	13,007	209.6%
June**	44,978	8,734	36,244	415.0%
YTD Total	162,707	0	(781,401)	
FY Total	162,707	944,108		

**Not final as of July 19, 2021

Month	COASTER - WEEKDAY			
	FY21	FY20	Variance	%
July	10,263	131,218	(120,955)	(92.2%)
Aug	9,412	112,100	(102,688)	(91.6%)
Sept	10,020	92,159	(82,139)	(89.1%)
Oct	10,968	105,601	(94,633)	(89.6%)
Nov	9,232	80,912	(71,680)	(88.6%)
Dec	7,519	75,534	(68,015)	(90.0%)
Jan	6,848	89,920	(83,072)	(92.4%)
Feb	7,866	84,613	(76,747)	(90.7%)
Mar	11,203	44,368	(33,165)	(74.7%)
Apr	15,184	5,244	9,940	189.5%
May	17,221	6,207	11,014	177.4%
June**	35,192	8,734	26,458	302.9%
YTD Total	150,928	0	(685,682)	
FY Total	150,928	836,610		

**Not final as of July 19, 2021

Month	COASTER - SATURDAY			
	FY21	FY20	Variance	%
July	-	9,415	(9,415)	(100.0%)
Aug	-	14,348	(14,348)	(100.0%)
Sept	-	8,449	(8,449)	(100.0%)
Oct	-	3,247	(3,247)	(100.0%)
Nov	-	8,385	(8,385)	(100.0%)
Dec	-	4,387	(4,387)	(100.0%)
Jan	-	3,218	(3,218)	(100.0%)
Feb	-	5,181	(5,181)	(100.0%)
Mar	-	665	(665)	(100.0%)
Apr	-	0	0	
May	1,387	0	1,387	
June**	5,881	0	5,881	
YTD Total	7,268	0	(50,027)	
FY Total	7,268	57,295		

**Not final as of July 19, 2021

Month	COASTER - SUNDAY			
	FY21	FY20	Variance	%
July	-	8,882	(8,882)	(100.0%)
Aug	-	7,034	(7,034)	(100.0%)
Sept	-	13,625	(13,625)	(100.0%)
Oct	-	2,197	(2,197)	(100.0%)
Nov	-	5,254	(5,254)	(100.0%)
Dec	-	4,030	(4,030)	(100.0%)
Jan	-	5,653	(5,653)	(100.0%)
Feb	-	2,051	(2,051)	(100.0%)
Mar	-	1,477	(1,477)	(100.0%)
Apr	-	0	0	
May	606	0	606	
June**	3,905	0	3,905	
YTD Total	4,511	0	(45,692)	
FY Total	4,511	50,203		

**Not final as of July 19, 2021

ATTACHMENT 6 – Project Data Request

Table 1: Project Information Request

Project	Estimated Total Project Cost	Current Planned Year of Construction	Draft RTP Assumed Year of Construction	Assumed Federal/State Matching Funding (%)
San Dieguito Lagoon Double Track and Platform				
Batiquitos Lagoon Double Track and Bridge Replacement				
Eastbrook to Shell Double Track				
Carlsbad Village Trench				
La Costa to Swami Double Track				
San Onofre Bridge Replacements				
Rose Canyon Bridge Replacements				

ATTACHMENT 7 – Detail of Proposed Rail Lines

Table 3: Detail of Proposed Rail Lines

	Rail Mode (CR, LR, HSR, Hybrid)	Directional Miles	% of Directional Miles Grade Separated/Tunnel	Number of Stations	Average Distance Between Stations	Average Speed Operated	Interoperable with COASTER equipment (Y/N)
New Rail Line							



County of San Diego

DAHVIA LYNCH
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

VINCE NICOLETTI
ASSISTANT DIRECTOR

August 8, 2023

Kirsten Uchitel
Associate Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Sent via email to: RegionalPlanAmendment@sandag.org

REQUEST FOR COMMENTS ON THE AMENDMENT TO THE 2021 REGIONAL PLAN FOR THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)

Dear Kirsten Uchitel,

County of San Diego (County) staff has reviewed the San Diego Association of Governments (SANDAG) Amendment to the 2021 Regional Plan (Project), dated June 13, 2023. The amendment proposes to remove the regional Road User Charge (RUC) from the 2021 Regional Plan. Included as part of this amendment are updates to the financial strategies intended to demonstrate that there will be sufficient revenues to pay for the planned transportation improvements without the RUC. The Amendment is also intended to demonstrate that the federal Air Quality Planning and Transportation Conformity will also still be met and analyzes consistency with state targets to reduce greenhouse gas (GHG) emissions consistent with Senate Bill 375 (SB 375).

County staff is committed to continuing to partner with SANDAG staff on our shared goals of implementing programs and services to improve the quality of life of our residents and offers the following comments for consideration. The comments provided below are not an indication of County support or opposition for this Project. However, the County remains concerned that the original 2021 Regional Plan does not sufficiently take into consideration the existing population of the unincorporated area, particularly underserved and disadvantaged communities. Currently, the Regional Plan planning framework precludes the County from competing for millions of dollars in much-needed infrastructure and planning funding available to the region. The County is concerned that the reduced revenue projected under the updated Regional Plan will exacerbate these inequities and possible future funding to the unincorporated area. This comment letter includes a summary of these, and other key issue areas identified by staff in previous comment letters to SANDAG on both the 2021 Regional Plan (August 6th, 2021) and the 2021 Regional

Kirsten Uchitel
August 8, 2023
Page 2

Plan Draft Programmatic Environmental Impact Report (October 11, 2021), provided as attachments to this comment letter (Attachment A and Attachment B, respectively). The County requests that SANDAG consider and provide responses to the County's comments.

Removal of the Regional Road User Charge and Revenue Assumptions

The Regional Road User Charge (RUC) was previously deemed a necessary component in the 2021 Regional Plan. As was shared in our comments on the 2021 Regional Plan (attachment A), it is important for the County to better understand how investment would be applied to ensure that both the benefits and costs of the Regional Plan are equitably distributed across the region and the methodology for how the amended plan and future projects will function without the RUC. The proposed project provides updated revenue assumptions that show a net decrease in revenues from \$173 billion to \$163 billion over the plan's 30-year life. The updated revenue assumptions include future local sales tax revenue, updated TransNet revenue, and updated State and Federal funding. The Amendment states that this revenue will be sufficient to fund the anticipated transportation improvements as well as the ability to document the federal Air Quality Planning and Transportation Conformity; however, these funding sources are not guaranteed and therefore, may not be realized.

For example, a TransNet amendment may not qualify for the 2024 ballot and/or may not be passed by the voters and Bipartisan Infrastructure Law funding (BIL) is a competitive grant process that may not provide the level of funding that is anticipated. Considering this, the County is requesting further clarification on:

1. **Revenue Assumptions:** How the 2021 Regional Plan will meet its revenue assumptions, including the risks and impacts to projects if these anticipated revenue sources are not realized over the life of the Plan. It is unclear whether projects that have previously been planned, programmed, or awarded as part of TransNet would retain funding that was previously allocated, or if there would be any changes to the current allocation or use of funds that local agencies receive directly for local road system improvements if the revenue assumptions are not realized; and
2. **Project Prioritization:** It is unclear what methodology SANDAG will utilize for prioritizing projects if funding assumptions are not realized, including what, if any, criteria would be utilized to include or not include projects on the list for funding and how will local jurisdictions be involved in the process of project prioritization. The County reemphasizes that revenues generated should be allocated to support additional transportation and mobility options in unincorporated communities, which often have longer commutes and less access to alternative transportation options due to absence of regional planning for transit services to these communities.

Expansion of Mobility Hubs

In previous comment letters to SANDAG, the County provided comments regarding the need for more consideration and planning for the unincorporated areas. Less than 1% of the unincorporated area was included within mobility hubs, which is where transit and on-demand travel infrastructure investment is focused. To promote greater equity, mobility hubs should be inclusive of adjacent unincorporated communities, many which have greater populations than the incorporated cities and often, less access to alternative transportation options.

The removal of the RUC should be examined in terms of its impact on the planned transportation system, particularly in providing travelers with alternatives to driving. Previously, the County provided comment regarding the 2021 Regional Plan which delineated the boundaries of mobility hubs along jurisdictional boundaries, excluding more than 99% of the unincorporated area. The County maintains that there are opportunities to expand the proposed mobility hubs to include unincorporated communities, which would benefit from additional access to investment associated with inclusion in the adjacent mobility hubs, as these communities have few existing alternative options to driving. Below are some areas the County requests clarification on regarding mobility hubs:

1. **Implications:** Providing an assessment on the implications of the change in proposed funding sources, including the removal of the RUC, on the unincorporated county and its potential impact on growth in these areas is important.
2. **Development:** Understanding how this change might affect growth dynamics is key for evaluating regional development.
3. **Boundaries:** Reconsidering the boundaries of mobility hubs to include unincorporated areas is an important aspect to address within the regional plan. The County requests further details on SANDAG's approach to reevaluating the boundaries of the mobility hubs.

Regional Housing Needs Assessment and Sustainable Communities Strategy

County staff relies on SANDAG population, housing, and job growth forecasts for planning efforts. For the 6th Cycle Regional Housing Needs Allocation (RHNA), the unincorporated portion of the County was allocated 6,700 units for the planning period of 2021 – 2029. The 2021 Regional Plan forecasts that the County will build 7,419 units through 2050. Historic data shows that from 2010 to 2020, 7,330 new homes were built in the unincorporated area. If that trend continued, an additional 22,000 new homes would be built in the unincorporated area by 2050. In contrast to these historical trends, the Regional Plan forecast projects that the unincorporated county will only grow by 719 units between 2029 and 2035 and projects no future growth in the unincorporated area through 2050. The Sustainable Community Strategy for the unincorporated area should not be a no-growth strategy. The County is interested in understanding how SANDAG will account for future growth within the unincorporated areas, including natural growth beyond 2035 in the Regional Plan. Growth within the unincorporated areas should be included in the regional planning process. Below are some areas the County requests clarification regarding RHNA and the Sustainable Communities Strategies (SCS):

1. **Goals and Growth:** The County is requesting further transparency as to how SANDAG plans to reconcile this discrepancy and ensure alignment between RHNA goals, growth forecasts, funding availability, and the need to incorporate future growth in the unincorporated areas into the regional planning process.
2. **Alignment:** There should be alignment between RHNA goals, growth forecasts, and funding availability.

Greenhouse Gas Reduction Strategies

The County has and continues to request that SANDAG align GHG reduction and housing goals both in the 2021 Regional Plan and in the forthcoming 2025 Regional Plan. Ensuring alignment between GHG reduction strategies and RHNA goals is also essential for an integrated and sustainable planning approach. SANDAG's alignment with California Air and Resource Board (CARB) targets for transportation emissions must consider similar GHG reduction targets which are also set by CARB for local jurisdictions. The Amendment to the 2021 Regional Plan also identifies the need for funding beyond a fuel tax due to the shift in electric vehicles (EV) and more fuel-efficient vehicles. Below are some areas the County requests clarification on regarding GHG Reduction Strategies:

1. **Feasibility:** The County requests further transparency about the strategy and feasibility of implementing programs and plans to achieve GHG reductions in compliance with State targets that may be impacted from the removal of the RUC. Elaborating on how SANDAG intends to align these components would enhance transparency and clarity and will help ensure that coordination of regional GHG reduction goals.
2. **Local Alignment:** Please clarify how RUC removal and funding sources impact SANDAG partnerships which rely on grant funding to initiate programs, improvements, and initiatives which support smart growth in Mobility Hubs, connection, and reduction of Vehicle Miles Traveled (VMT) initiatives for GHG emissions within the unincorporated areas including environmental considerations and RHNA growth projection alignments.
3. **Cost:** It would be valuable to know if SANDAG made network performance assumptions to account for the contemporary increased costs of vehicles, rate of electric vehicle adoption, maintenance, fuel, insurance, inflation, and the overall cost of living for drivers, commuters, and other social and demographic trends and shifts to quantify the economic and greenhouse gas emissions impact.
4. **Funding Allocations:** Clarifying the approach taken to funding allocation would provide a better understanding of the analysis for the GHG emission reduction alignments with the state, CARB, grant funding, and expanding Mobility Hub connections within the unincorporated region. Regarding the implementation of projects and achievement of compliant emission levels, it would be beneficial to clarify which funds have been reallocated or will be added for this purpose.

Conclusion

Loss or reallocation of funding due to the removal of funding sources such as the RUC and pending funding sources could affect anticipated projects and limit the County's ability to provide housing and affordable, reliable, and safe mobility options, particularly to underserved communities. It is important to understand how SANDAG will address potential scenarios where revenue sources, such as TransNet funding or competitive BIL funding, are not realized at the anticipated levels. In such cases, it would be valuable to know how SANDAG will prioritize projects and adjust its strategies to ensure effective and equitable resource allocation and what role local jurisdictions will have in the project prioritization process. The County would like to understand if there are plans to revise an updated RUC or consideration of a similar revenue stream to replace the RUC and how SANDAG plans to address the County's previously provided feedback (Attachment A and Attachment B). The County is committed to working with SANDAG to ensure

Kirsten Uchitel
August 8, 2023
Page 5

that potential funding and project opportunities within the unincorporated areas are not precluded in the future. The County would like to understand how County comments provided to date will be addressed in this amended plan and on a go-forward basis.

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Ashley Rivero, Land Use / Environmental Planner / Long Range Planning Division, at (619) 629-4438, or via e-mail at Ashley.Rivero@sdcounty.ca.gov.

Sincerely,

Lynnette Santos

Lynnette Santos
Chief, Long Range Planning Division
Planning & Development Services

Enclosures: Attachment A – COSD Comment Letter 2021-08-06
Attachment B – COSD Comment Letter 2021-10-11

cc: Stephanie Hernandez, CAO Staff Officer, LUEG (Stephanie.Hernandez@sdcounty.ca.gov)
Donald Chase, Planning and Development Services (Donald.Chase@sdcounty.ca.gov)
Nick Ortiz, Department of Public Works (Nick.Ortiz@sdcounty.ca.gov)
William Morgan, Department of Public Works (William.Morgan@sdcounty.ca.gov)
Jacob Armstrong, Planning and Development Services (Jacob.Armstrong@sdcounty.ca.gov)
Kevin Johnston, Planning and Development Services (Kevin.Johnston@sdcounty.ca.gov)
Tyler Farmer, Planning and Development Services (Tyler.Farmer@sdcounty.ca.gov)



County of San Diego

SARAH E. AGHASSI
DEPUTY CHIEF ADMINISTRATIVE OFFICER

LAND USE AND ENVIRONMENT GROUP
1600 PACIFIC HIGHWAY, ROOM 212, SAN DIEGO, CA 92101
(619) 531-6256
www.sdcounty.ca.gov/lueg

August 6, 2021

Hasan Ikhata
Executive Director
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Sent via email to: SDForward@sandag.org

REQUEST FOR COMMENTS ON THE DRAFT 2021 REGIONAL PLAN FOR THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)

Dear Mr. ^{Hasan}Ikhata,

Thank you to the San Diego Association of Governments (SANDAG) for your efforts to create a Regional Comprehensive Plan and Sustainable Communities Strategy (Regional Plan) to help design a regional transportation system that is fast, fair, clean and reduces greenhouse gas emissions. As County staff, we are committed to working with SANDAG staff on our shared goals of implementing programs and services to improve the quality of life of our residents as we determine where and how we grow, connect people and places, protect the environment, and provide opportunity for all of our region's residents.

This comment letter outlines areas within the Regional Plan for which County staff would like to request further clarification, exploration, and consideration. Attachment A provides additional comments from County staff for your consideration and incorporates additional information related to County-specific plans or policies that may further inform the Regional Plan.

LAND USE, TRANSPORTATION PLANNING, AND SMART GROWTH

Land use and transportation planning in the San Diego region is evolving to better address the most pressing issues of today, including climate change, quality of life, attainable housing, and social and economic inequities. The County has several planning efforts underway which prioritize addressing these issues, including the Regional Decarbonization Framework, the Climate Action Plan Update, the Electric Vehicle Roadmap, Office of Environmental and Climate Justice, and establishment of VMT thresholds. While independent of the Regional Plan, these efforts are aligned with the goals of the Regional Plan. County staff is interested in further understanding the regional growth modeling assumptions used within the Regional Plan and alignment with these County efforts.

PLANNING FOR THE UNINCORPORATED AREAS

The County represents more than 500,000 residents who live within 34 unincorporated communities throughout the region. County staff would like to better understand how the Regional Plan will address transportation options outside of proposed mobility hubs for those communities. The unincorporated community of Ramona, for example, has a population of 36,000 residents, which is a larger population than the incorporated communities of Imperial Beach, Lemon Grove, Coronado, Solana Beach, and Del Mar.

Less than 1% of the unincorporated area is within the proposed mobility hubs, which is where transit and on-demand travel infrastructure investment will be focused. The unincorporated north and east county communities represent a significant population with higher-than-average VMT in the region. Investment in public transit and other transportation options will make it easier for people to drive less, which results in decreased GHG emissions. However, investment outside of mobility hubs appears to be limited, which would make it difficult for unincorporated residents to use new transit service.

To promote greater equity, County staff see opportunities to expand the proposed mobility hubs to include adjacent unincorporated communities. When we overlay the proposed mobility hubs with the County's VMT efficient areas (using both the unincorporated and regional averages), North County Metro, Lakeside, and Spring Valley (Attachment B) are adjacent to what appear to be proposed mobility hubs. These unincorporated communities would benefit from additional access and investment associated with inclusion in adjacent mobility hubs, as these communities have few existing alternative options to driving.

County staff is also interested in understanding how Regional Housing Needs Assessment (RHNA) allocations would be assigned. For the current 6th RHNA cycle, which covers 2021 – 2029, SANDAG allocated 6,700 units for the unincorporated area, with a total housing forecast in the Regional Plan of 7,419 units through 2050 for the unincorporated area. This forecast projects the County's RHNA allocation of 6,700 units being met by 2029, with an additional growth of 719 units by 2035, and projects no further growth in the unincorporated area through 2050. Based on this forecast, it appears that beyond 2035, all future housing needs in the region from RHNA cycles would be allocated to and met by growth in incorporated cities.

In order to fulfill the goals of the Regional Plan in providing access to affordable, reliable, and safe mobility options for everyone in the region, County staff would like to work with SANDAG to ensure consideration is given to future investments and incentives within the unincorporated area that would result in expanded options for transit and active transportation, and to encourage shorter and fewer automobile trips, including locations of mobility hubs, transit leap, flexible fleets, and complete corridors.

COMMUTER PATTERNS AND MOBILITY IN THE UNINCORPORATED AREA

The Regional Plan focuses on five key investment opportunities: Next Operating System (OS), Complete Corridors, Transit Leap, Mobility Hubs, and Flexible Fleets. Many of the Regional Plan investments would be contained within proposed mobility hubs and along identified complete corridors. The majority of infrastructure improvements appear to support a shift to new rail and trolley line infrastructure, largely along the coastal areas. However, Ramona, Lakeside, Spring Valley, and other unincorporated east and north county communities represent a significant population that would benefit from similar consideration for infrastructure improvements as that proposed for the coastal communities with less population. According to SANDAG's "Commuting Patterns in the San Diego Region" study, a majority of the unincorporated east and north county residents who are employed commute outside the boundaries of their County Supervisorial

district, with 84% of District 2 residents working outside the district and 82% of District 5 residents working outside the district. Vehicle miles traveled could be reduced through greater mobility options for the unincorporated area (i.e., expansion of mobility hubs, increased transit options such as bus rapid transit, and improvements to transit frequency and service areas).

The County worked closely with SANDAG as part of the 2015 Regional Plan to identify roads in the unincorporated areas to include in the Regional Arterial System (RAS). Many of these roads serve as evacuation routes during emergencies, provide access to unincorporated communities from Caltrans roads, and create a link to the larger San Diego region.

County staff would like to continue coordinating with SANDAG to further identify Regional Plan investments in infrastructure, technology, and communication improvements for roads identified in both the County's Mobility Element and unincorporated roads included in the RAS and how these investments will further connect the unincorporated area to proposed mobility hubs, flexible fleets, or transit leaps. In addition to providing efficient movement of people and goods, these investments would increase the efficiency of evacuation routes, relay important information on evacuation conditions to first responders, and assist in getting residents safely away from hazardous conditions, all important components of resiliency planning.

FUNDING AND FINANCING

County staff appreciates the difficulty in forecasting funding and revenue sources for a regional transportation network. The Regional Plan identifies use of TransNet funds as part of the implementation, but it is not clear whether projects that have previously been planned, programmed, or awarded as part of the previous plan using TransNet would retain that funding allocation, or if there would be a reallocation of these funds as part of the Regional Plan. It is also unclear if there would be any changes to the current allocation or use of funds that local agencies receive directly for local road system improvements. The unincorporated area relies on TransNet funding to build, improve, and maintain transportation facilities that enhance roadway safety and support smart growth development, including road infrastructure to support increased transit options. Loss or reallocation of this funding could affect these projects and limit the County's ability to provide transportation services in support of our goal of reducing greenhouse gas emissions.

The Regional Plan indicates that user fees would help build a transportation system that provides travelers with alternatives to driving. County staff would like to further discuss how the proposed road user charges would be developed, implemented, and applied to ensure that this funding strategy will not disproportionately burden unincorporated communities, which often have longer commutes and less access to alternative transportation options due to lack of regional planning for transit services to these communities. Revenues generated should also be allocated to support additional transportation and mobility options in unincorporated communities, while vehicle use by those with access to alternate modes of transportation should be disincentivized since their communities are receiving significant investments in public transit.

County staff looks forward to learning more about how future funding and investment would be applied to ensure that both the benefits and the costs of the Regional Plan are equitably distributed across the region.

RESOURCE DISTRIBUTION

The Regional Plan provides SANDAG with an opportunity to guide future investments in a way that meets smart growth objectives and reduces GHG emissions, but also guides future allocation of resources to achieve equitable outcomes. Several of the unincorporated communities, such as Lakeside, Spring Valley, and Ramona, have larger populations than some of the incorporated

2021 Regional Plan – County of San Diego Staff Comments
August 6, 2021
Page 4

cities that are prioritized in the Regional Plan. In review of the proposed plan expenditures, a majority of the capital investments (55% of RTP funding) appear to go toward mobility hubs, complete corridors, and Next OS investments that are primarily outside of unincorporated communities. It is unclear what proportion of investment would go toward addressing mobility challenges within unincorporated communities and infrastructure investment that would provide linkages between the unincorporated areas and the proposed mobility hubs, transit leap, flexible fleets, and complete corridors. County staff is committed to working with SANDAG to further identify opportunities to equitably distribute the mobility benefits of the 5 Big Moves and further reduce GHG emissions regionwide.

The County appreciates the opportunity to comment on the Draft Regional Plan, and staff looks forward to future discussions regarding these comments. If you have questions regarding this letter, please contact Rami Talleh, Deputy Director with the Department of Planning and Development Services at 858-495-5475 or Rami.Talleh@sdcounty.ca.gov.

Sincerely,



SARAH E. AGHASSI
Deputy Chief Administrative Officer

cc: Chair Nathan Fletcher: Board of Supervisors, District 4
Vice Chair Nora Vargas: Board of Supervisors, District 1
Supervisor Joel Anderson: Board of Supervisors, District 2
Supervisor Terra Lawson-Remer: Board of Supervisors, District 3
Supervisor Jim Desmond: Board of Supervisors, District 5
Kathleen Flannery, Acting Director, Planning and Development Services
Jeff C. Moneda, Director, Department of Public Works
Brian Albright, Director, Department of Parks and Recreation

Attachments:

Attachment A: Comments from County Departments and Divisions
Attachment B: Expansion Potential of Mobility Hubs (North County Metro, Lakeside, and Spring Valley)



County of San Diego

SARAH E. AGHASSI
DEPUTY CHIEF ADMINISTRATIVE OFFICER

LAND USE AND ENVIRONMENT GROUP
1600 PACIFIC HIGHWAY, ROOM 212, SAN DIEGO, CA 92101
(619) 531-6256
www.sdcounty.ca.gov/lueg

ATTACHMENT A 2021 REGIONAL PLAN COMMENTS FROM COUNTY OF SAN DIEGO DEPARTMENTS AND DIVISIONS

County of San Diego (County) staff in Planning & Development Services, the Department of Public Works, and the Department of Parks and Recreation reviewed the San Diego Association of Governments' (SANDAG) Draft 2021 Regional Plan (Regional Plan), for applicability to their respective work programs and County initiatives that are planned or currently underway. The County offers the following comments for your consideration.

TRANSPORTATION

1. County staff would be interested to better understand and discuss further with SANDAG the potential for Regional Plan strategies to be used as part of a potential regional mitigation strategy related to Vehicle Miles Traveled (VMT).
2. When would funding be expected to be implemented related to Transit Leap/Flexible Fleet Connections to Mobility Hub areas, as this is a potential opportunity to reduce VMT for residents living in the unincorporated area?
3. The County has developed an Electric Vehicle (EV) Roadmap and is committed to assisting with the deployment of regionwide EV infrastructure to reduce GHG emissions in the transportation sector. Could SANDAG provide additional details on the future development, application, and implementation of the proposed Road User Fees and other proposed road usage revenues? Will consideration be given to exemptions for use of clean mobility strategies?
4. County staff would like to discuss with SANDAG staff the Regional Plan strategies, including funding for Major Transit (for purposes of CEQA, defined as a rail transit station, ferry terminal served by bus or rail, and a bus stop with two or more lines that provide transit service at 15 minute intervals or better during peak commute periods) in areas of the unincorporated area that are identified as "VMT efficient" in the SANDAG VMT Map.
5. There is significant investment in development and infrastructure in the Otay Mesa area, and Otay Mesa is identified as a "Mobility Hub" area in the RTP. County staff would like to better understand what funding has been identified for this "Mobility Hub" area.
6. County staff would like to discuss with SANDAG the potential for "Major Transit" services along the I-15 corridor, such as the potential for buses on shoulders.

ROADS/TRAFFIC/FIELD ENGINEERING

7. Complete Corridors, such as the SR-67 and I-15 Corridors, are envisioned to act as the backbone of the regional transportation system. In addition to providing for safe and comfortable spaces to get around for all modes of transportation, road improvements such as intersection widening are important for the safe and reliable movement of all road users. County staff would like to discuss further identification and investment within complete corridors that provide linkages to the unincorporated area. These improvements could assist in providing routes for the County's eastern and northern rural regions that could be essential in the event of accidents or fire evacuation. For example, County staff would like to discuss with SANDAG the option of including safety improvements along the SR-67 Corridor on Wildcat Canyon Road, as this road is a relief route to SR-67. Additionally, road improvements on Old Hwy 395 and Pala Temecula Road in the north county may merit further conversation, as both of these roads serve as alternate routes to I-15 during peak traffic hours.
8. County staff would like to further discuss improvements of low flow crossings that are necessary to limit area flooding as well as the safe passage of motorists.
9. County staff would like to work with SANDAG to identify evacuation routes at a regional level, and the possibility of creating a separate section within the Regional Plan that would identify improvements of these routes and potential funding that could be part of the 2021 Regional Plan.
10. County staff would like to discuss with SANDAG how Smart Infrastructure and Connected Vehicles will address the legal and financial challenges with sharing traffic signal data with private entities and the liability of the potential misuse of signal timing data.
11. County staff would like to better understand the impact of Electric Vehicle Infrastructure on County of San Diego public right of way.

WATERSHED

12. Stormwater Management & Regional Needs Assessment; suggested edits in Appendix R, page R-2:
 - a. "The County of San Diego has initiated an update of the 2010 Needs Assessment's 40-year water quality cost estimate using more recent water quality planning documents and strategies for achieving regulatory compliance and water quality objectives throughout the region. Since 2010, the Copermittees have worked to formulate Water Quality Improvement Plans (WQIPs) for the region's watersheds, including strategies, planned projects, and schedules to address their respective water quality objectives and compliance needs. The update to the Needs Assessment is intended to assist the County in planning and decision making and will draw upon the most recent WQIPs, with a focus on unincorporated areas to develop updated cost information."

BIOLOGY

13. Figure AA.1 shows the conserved habitat lands in the San Diego region (light green) and displays the areas included in the four subregional habitat conservation plans (subfigure).
 - a. The Pre-Approved Mitigation Area (PAMA) of the South County Multiple Species Conservation Program (MSCP) and draft PAMA of the draft North County MSCP are labeled as “Proposed Conserved Habitat Lands” (dark green). This label may be misinterpreted by readers. While the MSCP Preserves will be assembled within the PAMA, not all PAMA designated lands will be conserved or are being actively pursued for conservation at this time.
 - b. The draft Focused Conservation Area (FCA) of the draft East County MSCP was not included in the “Proposed Conserved Habitat Lands” (dark green). This area is equivalent to the draft North County MSCP’s draft PAMA and should be included in this figure.
 - c. The Rancho Guejito property located north of San Pasqual Valley Road will not be included in future iterations of the draft North County MSCP Permit Area. The portions of this property identified within the draft North County MSCP should be changed from dark green to white to reflect this change.
 - d. In the subfigure, both the draft North County MSCP and Multiple Habitat Conservation Plan (MHCP) are identified by the number “4.” The MHCP area should be identified by the number “1” to correspond with the provided key.
14. Although the draft 2021 Regional Plan mentions the importance of protecting habitat corridors and wildlife linkages through land acquisition, it does not appear to include the construction of safe passageways to connect wildlife to preserved lands bisected by existing and future regional transit corridors. It is recommended that SANDAG work with the San Diego Monitoring and Management Program (SDMMP) and community partners to identify the areas along regional transit corridors that would benefit from wildlife crossings and that these improvements be included in future regional projects.

PARKS AND RECREATION

15. For proposed projects that occur adjacent to Department of Parks and Recreation (DPR) County-managed lands, DPR staff would like to coordinate with SANDAG staff to ensure wildlife connectivity is maintained from adjacent lands to preserved County lands, including wildlife-only crossings.
16. For proposed projects that occur adjacent to or near existing or potential future trail connections, DPR staff would like to coordinate with SANDAG staff on trail connectivity throughout the County and incorporate safe multi-use crossings such as bridges or overpasses for recreational use.
17. DPR staff request SANDAG staff coordinate in developing SANDAG’s 5 Comprehensive Multimodal Corridor Plans as mentioned in Appendix B: Implementation near DPR facilities:
 - a. Central Mobility Hub and Connections, Coast, Canyons, and Trails – State Route 52, North County – SPRINTER/Palomar Airport Road/State Route 78/State Route 76, San Vicente – State Route 67, South Bay to Sorrento – Purple Line/Interstate 805/Blue Line/Interstate 5 South.

- b. Study additional seven corridors to inform the next Regional Continuing Actions.
 - c. Pursue funding opportunities for projects, programs, and services identified in completed CMCPs.
18. County Staff would like to discuss with SANDAG the possibility of including trails and trail systems within the unincorporated area as part of the 2021 Regional Plan and to consider California Coastal Trail connections to DPR facilities.

AIRPORTS

19. As the owner and operator for eight airports in the region, County Airports continues efforts to safely operate its facilities, ensure future land uses are compatible with aircraft operations, and protect the health and safety of people and property within the vicinity of an airport. The County's airports serve as transportation hubs, emergency service facilities and economic engines in their communities. McClellan-Palomar Airport is the only commercial airport in North County and has over 145,000 annual aircraft operations. It is also a Customs and Border Protection Port of Entry. In East County, Gillespie Field is the 44th busiest airport in the nation with 240,000 annual operations. Both of these airports support thousands of jobs and generate hundreds of millions of dollars in economic activity. The County looks forward to the integration of these airports into the regional transportation system.
20. The San Diego County Regional Airport Authority adopted Airport Land Use Compatibility Plans for the eight airports, which included land use compatibility policies related to airspace, noise, safety and overflight. Those policies have been adopted by the County of San Diego through its General Plan and Zoning Code. After evaluating the forecasted increases in housing and jobs around the Mobility Hubs, there are several land use assumptions related to safety and noise around Fallbrook Airpark, Jacumba Airport, Gillespie Field and McClellan-Palomar Airport that County staff would like to better understand. For example, there are forecasted incompatible housing increases within the Runway Protection Zones at Gillespie Field. These inconsistencies could result in the assumed intensities and densities increases being unachievable.



County of San Diego

SARAH E. AGHASSI
DEPUTY CHIEF ADMINISTRATIVE OFFICER

LAND USE AND ENVIRONMENT GROUP
1600 PACIFIC HIGHWAY, ROOM 212, SAN DIEGO, CA 92101
(619) 531-6256
www.sdcounty.ca.gov/lueg

ATTACHMENT B 2021 REGIONAL PLAN PROPOSED MOBILITY HUB EXPANSION AREAS

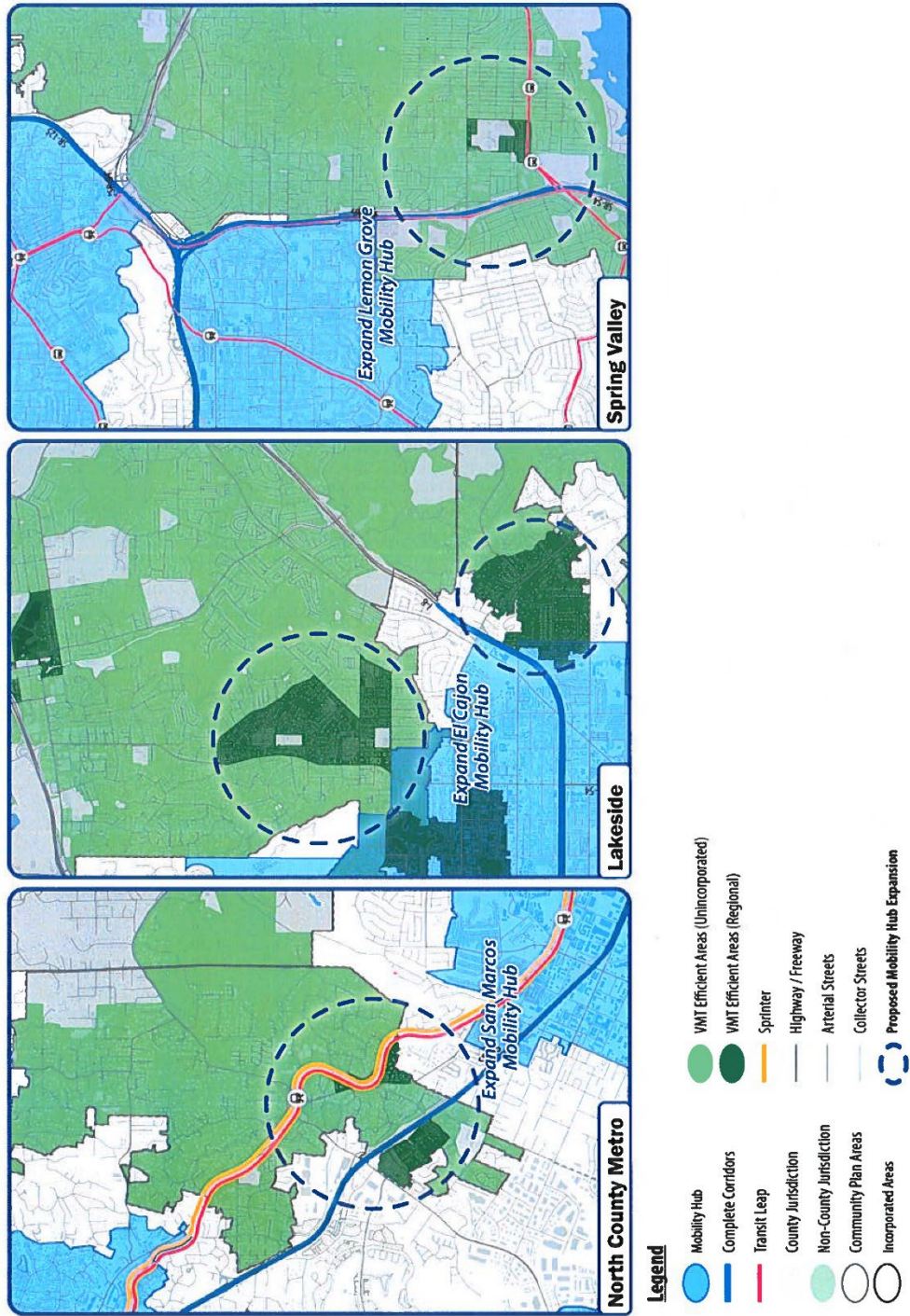
The Regional Plan will focus future investment, development, and growth in centralized areas referred to as “mobility hubs.” There are locations in the unincorporated area that the County has forecasted for future growth, which included already designated Regional Housing Needs Assessment (RHNA) sites, and are located within close proximity to a proposed mobility hub. The County would like to work with SANDAG to consider the expansion of proposed mobility hubs to include additional unincorporated north and east county communities. As indicated in Figure 1, these proposed expansions include areas in North County Metro, Lakeside, and Spring Valley. Additional details for these three mobility hub expansions are provided below.

The North County Metro community is located between the proposed Vista and San Marcos mobility hubs. Expansion of the San Marcos mobility hub could include the Buena Creek Sprinter Station and additional housing units, including multiple RHNA sites.

Lakeside has multiple areas that are identified as efficient areas compared to the regional vehicle miles traveled (VMT) average. These areas are located immediately adjacent to the proposed El Cajon mobility hub. Expansion of the El Cajon mobility hub could include these VMT efficient areas as well as potentially including additional growth areas in Lakeside along the I-8 corridor.

Spring Valley is located east of the proposed Lemon Grove mobility hub and south of the proposed La Mesa mobility hub. This community has existing transit access along Jamacha Boulevard and is in close proximity to the MTS Trolley stations in Lemon Grove. Expansion of this mobility hub could include the Spring Valley areas near SR-125 and along Jamacha Boulevard.

Figure 1 Proposed Mobility Hub Expansions in North and East County





County of San Diego

KATHLEEN A. FLANNERY
ACTING DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

VINCE NICOLETTI
ACTING ASSISTANT DIRECTOR

October 11, 2021

Kirsten Uchitel
Associate Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Sent via email to: RegionalPlanEIR@sandag.org

**RE: REQUEST FOR COMMENTS ON THE DRAFT PROGRAMMATIC ENVIRONMENTAL
IMPACT REPORT FOR SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN FOR SANDAG**

Dear Ms. Uchitel,

The County of San Diego (County) staff reviewed SANDAG's Draft Programmatic Environmental Impact Report (Draft PEIR) for "San Diego Forward: The 2021 Regional Plan," dated August 2021. County staff provided detailed comments regarding the 2021 Regional Plan (Proposed Plan) in a letter previously submitted to SANDAG. The letter, dated August 6, 2021 (Attachment A), outlined opportunities within the Proposed Plan for which County staff requested further clarification, exploration, and consideration. County staff would like to continue discussions with SANDAG on how these opportunities align with the objectives of the proposed plan and the Draft PEIR.

To ensure that potential opportunities within the unincorporated area are not precluded in the future, County staff requests that SANDAG consider the comments below on the Draft PEIR and that any necessary refinements be reflected in Chapter 2, Project Description, and analyzed in the appropriate sections of the Final PEIR. County staff appreciates the opportunity to review the Draft PEIR for the Proposed Plan and offers the following comments for your consideration:

GENERAL

1. The Draft PEIR (Table 2-5) notes that 56% (1,855,597 out of 3,309,510 total people) of San Diego County residents are currently located outside of a Mobility Hub Network, including 512,597 people in the unincorporated area. With the significant investment described in the Proposed Plan, County staff would like to ensure that it is fairly and equitably distributed for the benefit of all County residents, including rural residents living in unincorporated communities.

2. Staff recommends the inclusion of potential investments in roads identified in the County's Mobility Element and in the Regional Arterial System that would further connect the unincorporated area to proposed mobility hubs, with consideration of those roads that also serve as evacuation routes.
3. Staff would also request consideration of how transit can be aligned with recreation access points to increase access to these important regional amenities.
4. The Proposed Plan focuses on mobility and land use changes that would serve three primary user groups: pedestrians, bicyclists, and vehicles. Please consider updating the analysis to consider mobility needs for wildlife (wildlife corridors) and for equestrians where appropriate.
5. From a social equity standpoint, please consider if allowing single occupancy vehicles should be permitted in managed lanes. Allowing single occupants that can afford to travel in managed lanes will create some inequities in the community.

AIRPORTS

1. The San Diego County Regional Airport Authority adopted Airport Land Use Compatibility Plans for the eight airports, which included land use compatibility policies related to airspace, noise, safety, and overflight. Those policies have been adopted by the County of San Diego through its General Plan and Zoning Code. After evaluating the forecasted increases in housing and jobs around the Mobility Hubs, there are several land use assumptions made in the Proposed Plan related to safety and noise around Fallbrook Airpark, Jacumba Airport, Gillespie Field, and McClellan--Palomar Airport that County staff would like to better understand. For example, there are forecasted incompatible housing increases within the Runway Protection Zones at Gillespie Field. These inconsistencies could result in making the assumed intensities and density increases included in the Proposed Plan unachievable.

AESTHETICS AND VISUAL RESOURCES

1. Page 4.1-10 of the Draft PEIR mentions the County of San Diego Dark Sky Ordinance and associated regulation of outdoor light fixtures within 15 miles of local observatories. This ordinance also includes the minimization of light pollution to reduce impacts to wildlife. Please consider expanding the analysis to address direct and indirect impacts due to light and glare on open space lands and wildlife corridors/linkages.
2. It is not clear what type of trees and vegetation will be used to replace impacted vegetation in cases where vegetation disruption causes potential aesthetic impacts (Mitigation Measures AES-2a, 2b, AES-3a). Mitigation Measure BIO-1e specifies that certain invasive species shall not be used to replace impacted vegetation. Please consider adding that same requirement to the Aesthetic/Visual Resources mitigation measures in the Draft PEIR.

BIOLOGICAL RESOURCES

1. Please clarify the significant reduction in acreages impacted between the 2015 EIR and the 2021 Draft EIR, especially as they relate to Wetlands and Riparian Habitat, Upland Habitat, Agricultural Land, and Transportation. The differences do not appear to correlate with the changes or updates made between the 2015 and 2021 Regional Plan.
2. On January 13, 2017, County staff submitted comments to SANDAG on the Notice of Preparation (NOP) of the Regional Plan Draft PEIR (Attachment B). In that letter, the County requested that SANDAG coordinate with County staff and evaluate in the Draft PEIR potential direct and indirect impacts on the Multiple Species Conservation Plan (MSCP). The comments related to the MSCP still stand (Attachment B). As such, it is not clear how the Proposed Plan would impact the MSCP, or if there is specific mitigation proposed to reduce these impacts. Please consider updating the analysis to clarify these potential impacts and associated mitigation.
3. Please ensure that maps are using the latest GIS data available from SanGIS, which is regularly updated. For example, the maps showing Open Space Parks and Recreation land (Figures 4.15-1 and 4.15-2) seem to be missing some of the County's Department of Parks and Recreation properties. Please ensure all references to County Department of Parks and Recreation properties are updated throughout the 2021 Draft PEIR.
4. Please consider including County parks and preserves and associated proposed project impacts to each specific park and preserve within the Draft PEIR; data on County parks and preserves can be found on SanGIS. For example, on Page 4.4-107, it states that the largest area of encroachment and associated impacts would occur on the Otay Ranch Preserve. However, the level and extent of that potential impact is not clear. Please coordinate in advance with the County Department of Parks and Recreation prior to implementation of projects that may have impacts to County parks and preserves.
5. The figures within the Draft PEIR do not show property ownership overlaid with the proposed project. To better understand and analyze potential impacts of the project, please consider the inclusion of a figure that shows County parks and preserves.
6. Please consider revising "Hardline Preserve" to "MSCP Preserve" throughout the Draft PEIR, as MSCP Preserve is the term most commonly used.
7. In Table 4.2-2 and Table 4.4-6, Otay Ranch and the associated General Development Plan/Subregional Plan are categorized as falling under the jurisdiction of the City of Chula Vista. While the text clarifies that Otay Ranch is jointly owned and managed by the City of Chula Vista and the County, the categorization in the tables is unclear. Please consider revising the tables to show the joint ownership and management of this area.
8. Figure 4.4-16, San Diego Conservation Planning Areas and Conserved Lands, does not appear to be consistent with the Subarea Plans under Adopted MSCP/MHCP Subregional Plans listed in Table 4.4-5. Please consider revising these to show all Subarea Plan Areas.
9. On page 4.4-107, Section BIO-4 Analysis Methodology, please consider updating the methodology to take into consideration requirements of the Public Park Preservation Act of

Ms. Uchitel
October 11, 2021
Page 4

1971 (Public Resources Code Sections 5400-5409). In the event the Proposed Plan results in "take" of any County MSCP Preserve Lands, this would be considered "take" of designated park land and may require land or other compensation for loss of park land.

10. In Figures 4.4-3 through 4.4-8, one of the data sources for these figures is stated as the County of San Diego's SanBios data from 2017. Please consider using the County of San Diego's SanBios data through 2020, as this contains updated data.
11. Table 4.4-5 states that the County is pursuing an amendment to the South County Subarea Plan to include the Quino checkerspot butterfly (QCB). Please remove reference to QCB as the County has expanded the project to the Regional Butterflies Habitat Conservation Plan (RBHCP) to include a comprehensive approach that would cover QCB, Harbison's dun skipper, Hermes copper, and the Laguna Mountains skipper.
 - a. Additionally, the RBHCP is currently being developed and has not yet been adopted. Therefore, reference to the RBHCP may not need to be included in Table 4.4-5 related to adopted regional conservation plans. Please consider removing the reference.
12. Given the significance and regional importance of wildlife corridors and wildlife linkages, please consider updating the analysis to consider areas where linkages and corridors could be impacted by the Proposed Plan and any mitigation measures that could be implemented to improve wildlife linkages.
13. Spread of invasive plants is a significant regional issue that many land managers face throughout the San Diego region. County staff supports Mitigation Measure B10-1e, which would require a prohibition on planting or seeding of invasive species that appear on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory. Please consider inclusion of an integrated invasive plant control plan with enforceable protocols for maintenance, construction, and emergency activities to follow when working within and moving between important habitat areas.
14. Section 4.4 has a description of the TransNet Environmental Mitigation Program (EMP) and states that the EMP provides funding for the acquisition, restoration, and management costs for the implementation of local Natural Community Conservation Plans (NCCPs). The EMP or other funding from TransNet may not provide a long-term regional funding source for conservation, including funding for the acquisition or ongoing management and monitoring. Please consider updating the PEIR to clarify that an adequate regional funding source has not yet been identified or put in place, which leaves local jurisdictions responsible for securing ongoing funding to implement local NCCPs.

CULTURAL RESOURCES

1. Please consider associated potential impacts on County parks and preserves related to cultural and historical resources. Staff understand that this is a PEIR, so please include the maximum possible area of impacts. Please coordinate in advance with the County Department of Parks and Recreation prior to implementation of projects that may have impacts to County parks and preserves and associated cultural and historical resources.

GEOLOGY, SOILS AND PALEONTOLOGY

1. The Grading and Erosion Regulations section does not identify and summarize applicable grading and erosion control ordinances. Applicable regulations are generally referenced to support a less-than-significant determination for thresholds (e.g GEO-3, Result in Substantial Soil Erosion or the Loss of Topsoil). The County's Grading Ordinance appears to only be referenced within the context of paleontological resources. Please consider also referencing the County's Grading Ordinance in the Grading and Erosion Regulations section.
2. Please consider revising Table 4.7-3 to reference the County of San Diego General Plan Goals S-8 and S-9. Local Policies Concerning Geologic and Seismic Hazards references Goal S-7, but it should read "The San Diego County General Plan Goal S-8 and S-9 in the Safety Element requires minimized personal injury and property damage resulting from seismic hazards, and damage caused by mudslides, landslides, or rock falls."
3. Within Table 4.7-4, Local Policies Concerning Unique Geological and Paleontological Features, for the County of San Diego, please consider including the following: "COS-9.1 Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes."
4. The Draft PEIR states "there would be development on soils incapable of supporting septic tanks or Onsite Wastewater Treatment Systems (OWTS)." However, the analysis also states that through future corrective measures/regulatory requirements, impacts to groundwater would be less than significant. Please consider adding a discussion of which regulations would be applicable and how those regulatory requirements would ensure that there would be no adverse groundwater impacts.

GREENHOUSE GAS EMISSIONS

1. On January 13, 2017, the County submitted comments to SANDAG on the Notice of Preparation (NOP) of the Regional Plan Draft PEIR (Attachment B). At the time of these comments, the County was in the process of preparing the 2018 Climate Action Plan (CAP). Since the release of the NOP and submittal of these comments, County staff is now preparing a CAP Update that will set new greenhouse gas (GHG) emissions targets and identify measures to reduce GHG emissions in the unincorporated area. County staff would like to work collaboratively with SANDAG on the Proposed Plan to identify an efficient and cleaner multi-modal transportation system that reduces vehicle miles traveled for unincorporated area residents by providing mobility options, which would reduce greenhouse gas emissions, and improve air quality for all residents in the region (Attachment A). County staff requests that SANDAG consider the comments provided previously and listed below in the Draft PEIR.
 - a. *Analyze alternatives that address multi-modal transportation options for the unincorporated county, particularly as it relates to transit service and alternative fuel infrastructure.* County staff would encourage SANDAG to consider extending the benefits of mobility hubs and transit leap opportunities to unincorporated communities in which these services do not currently exist.

- b. *Analyze whether the developed/urban communities within the unincorporated county meet the Urban Area Transit Strategy.* The Urban Area Transit Strategy, considered in the previous 2050 Regional Transportation Plan, is not considered in this Proposed Plan and is replaced with broad concepts of Mobility Hubs. County staff is supportive of these efforts to centralize mobility investments for all users in urbanized areas. However, staff would encourage SANDAG to consider in the project description and analysis the potential for mobility hubs concepts that can be applied to unincorporated area communities that are not currently identified as being within and benefiting from mobility hubs and associated investments (Attachment A).
 - c. *Analyze an environmentally sustainable transportation system that can reduce vehicle miles traveled, gasoline consumption, and GHG emissions, while providing alternative modes of transportation for all economic sectors of our population.* County staff continues to encourage SANDAG to consider and identify sustainable transportation systems and strategies that can reduce vehicle miles traveled and GHG emissions from residents in unincorporated communities. For example, extending existing transit routes and reducing headways to increase transit service to unincorporated communities will encourage increased ridership, reduce vehicle trips, and will assist in decreasing GHG emissions.
 - d. *The County requests that SANDAG staff coordinate with County staff to ensure that the most recent planning assumptions are incorporated in the transportation models and growth forecasts.* It is not clear what projects or plans were considered and incorporated into the Proposed Plan modeling. However, there are some areas in which inconsistencies appear between approved development projects in the unincorporated area and projected growth identified in the Proposed Plan modeling. County staff relies on SANDAG population, housing, and job growth forecasts for planning efforts. As recently as July 2021, long-range planning efforts, such as the County's Housing Element Update, have relied on forecasts that project future housing growth in the unincorporated area of 50,184 new units between 2018 and 2050. These prior projections are significantly greater than the forecasted growth of 7,419 units during a similar time period in the Proposed Plan. Further, historic data shows that from 2010 to 2020, 7,330 new homes were built in the unincorporated area. If that trend continued, an additional 22,000 new homes would be built in the unincorporated area by 2050. County staff would appreciate continued coordination with SANDAG staff to ensure the most recent planning assumptions and projects are considered.
2. Based upon a review of the Draft PEIR, County staff encourages continued collaboration with SANDAG to ensure the most recent planning and land use assumptions (including approved development projects or those that are under construction) are reflected in regional modeling and growth forecasting. Through continued collaboration, the County can support the vision of the Proposed Plan by developing the CAP Update and related efforts based on similar assumptions and goals.

HAZARDS AND HAZARDOUS MATERIALS

1. Within Table 4.9-1 Major EnviroStor Hazardous Waste and Substances Sites in the San Diego Region, the list of sites does not appear to match the current Cortese list on the Department of Toxic Substances Control's (DTSC) website. Please consider adding a figure

to show where these sites are in relation to proposed land use changes and transportation improvements.

2. Threshold HAZ-1 seems to apply specifically for potential release of hazardous materials during pre-construction, demolition, or construction activities. However, the analysis in this section also discusses the potential for releases during operational activities. Please consider updating the mitigation measure to reduce the risk of hazardous materials releases during project operation.

HYDROLOGY AND WATER QUALITY

1. Please consider augmenting the analysis to consider potential water quality impacts that could affect sensitive wildlife species and their associated habitats.

LAND USE

1. The County's *Community Trails Master Plan* identifies multiple regional trails that are regional resources, as they would benefit residents and visitors throughout the region. Please consider how the potential transportation and land use changes could impact the connectivity of these regional trails. The County also requests that SANDAG consider further coordination with the County Department of Parks and Recreation during implementation of the Proposed Plan when potential regional and community trail impacts are anticipated. Additionally, please consider working with County staff to look for further opportunities to provide trail connections during implementation of transportation infrastructure projects where feasible.

PUBLIC SERVICES AND UTILITIES (RECREATIONAL FACILITIES)

1. Within the Section "County and City General Plans," please consider adding the County's Parkland Dedication Ordinance, Community Trails Master Plan, and County of San Diego Parks Master Plan to the Draft PEIR, as these are all resource documents that discuss regional trail and recreation facilities.
2. Page 4.15-42 and Page 4.15-45, Section REC-1:
 - a. 2025
 - i. The Regional Growth and Land Use Change section states that "*As noted under Threshold PS-1, approximately 78.8 percent of the 2025 population growth would occur within the City of San Diego, City of Chula Vista, and City of Escondido.*" Of the remaining 21.2 percent, it is unclear what portion is anticipated within the unincorporated County area. Please consider revising the PEIR to further clarify this.
 - ii. Transportation Network Improvements and Programs section: Please consider adding a table showing areas of impacts to recreational facilities belonging to or within the County's jurisdiction. The PEIR does not appear to specify which County of San Diego Recreational Facilities are impacted by the proposed project.

- b. 2035
 - i. As with the comment above under "2025," please consider revising the Regional Growth and Land Use Change section to show the percentage breakdown within the unincorporated area of the county.
 - ii. This section also states, "*Between 2026 and 2035, the majority of the open space conversions would occur as a result of growth and land use change in the Warner Springs area shown in Figure 4.15-2, which would convert 275 acres of open space parks to spaced rural residential use.*" However, the analysis does not appear to explain the potential impact associated with this proposed loss of open space/park land. It should also be noted that this project is not yet approved and therefore may not result in open space conversion for additional growth and land use change(s). Please consider updating the analysis to take this into consideration and to further clarify and explain potential impacts.
- 3. Page 4.15-47, under REC-1 Implement Mitigation Measures Parks and other Recreational Facilities, please specify and/or provide information on the impacted facilities within the unincorporated areas of the county. Are there impacts to existing parks, campgrounds, trails, etc.? Please also consider including details of impacted County of San Diego facilities within the environmental document.
- 4. In the Pedestrian Facilities section of the Draft PEIR it states, "It should be noted that trail facilities are also considered part of the pedestrian network. The trail facilities within the San Diego region are further described and analyzed in Section 4.15, Public Services and Utilities, of this PEIR, along with other recreational facilities." Section 4.15 Public Services and Utilities further explains the trail facilities. However, the information is limited in that it only references the California Coastal Trail. Trails are an important aspect of the regional transportation network. Please consider updating the analysis to include existing trails and pathways and include this information as part of the pedestrian facilities assessment. The County's existing *Community Trails Master Plan* may be used as a reference document regarding regional trails.

TRANSPORTATION

- 1. If the boundaries of the proposed mobility hubs are not intended to be static, please include narratives and/or graphics to further clarify that the boundaries are not absolute.
- 2. County staff recommends that any 5 Big Moves pilot program or case study include and/or consider the unincorporated area (i.e. Flexible Fleet Strategic Plan).
- 3. Please coordinate with County staff in advance of transportation plans that go through or near County properties and facilities.
- 4. Regarding page 4.16-34, 4.16.3 SIGNIFICANCE CRITERIA, TRA-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including -transit, roadway, bicycle, and pedestrian facilities:

Ms. Uchitel
October 11, 2021
Page 9

- a. 2025: Transportation Network Improvements and Programs, under Pedestrian (page 4.16-34). Table 4.16-8 shows a Pedestrian Analysis table showing average daily walking trips, walking mode share, and average length of walking trip. It is unclear as to whether these include an assessment of trail system(s) and trail facilities. Please consider including trails as a part of this analysis.
- b. 2035: Transportation Network Improvements and Programs, Same comment as 2025 above.
- c. 2050: Transportation Network Improvements and Programs, Same comment as 2025 above.

Thank you again for the opportunity to comment on the Draft PEIR. County staff looks forward to continued discussions with SANDAG on how we can work together to better ensure that consideration is given to future investments and incentives that would result in expanded options for transit, active transportation, and shorter and fewer automobile trips. If you have any questions regarding these comments, please contact Luis Duran, Land Use/Environmental Planner, at (619) 214-4698, or via e-mail at luis.duran@sdcounty.ca.gov.

Sincerely,

Lynnette Tessitore

Lynnette Tessitore
Chief, Long Range Planning Division
Planning & Development Services

cc: Rosa Olascoaga, Policy Advisor, Board of Supervisors, District 1
Gregory Kazmer, Land Use Director, Board of Supervisors, District 2
Cody Petterson, Policy Advisor, Board of Supervisors, District 3
Emily Wier, Policy Advisor, Board of Supervisors, District 4
Benjamin Mills, Policy Advisor, Board of Supervisors, District 5
Luis Pallera, CAO Staff Officer, LUEG
Luis Duran, Land Use/Environmental Planner, PDS
Sue Waters, Land Use/Environmental Planner, DPW
Crystal Benham, Group Program Manager, DPR
Emmet Aquino, Park Project Manager, DPR



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
www.sdcounty.ca.gov/pds

January 13, 2017

Andrew Martin
Senior Regional Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Via email to: Andrew.martin@sandag.org

COMMENTS ON THE NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT FOR SAN DIEGO FORWARD: THE REGIONAL PLAN

Dear Mr. Martin,

The County of San Diego (County) has reviewed the Notice of Preparation for the San Diego Forward Regional Plan Program Environmental Impact Report (PEIR). We appreciate the opportunity to provide input for SANDAG's consideration. The County offers the following comments.

TRAFFIC/TRANSPORTATION

The County is currently developing an Active Transportation Plan (ATP) for the unincorporated communities of the county. The ATP will integrate and update several existing plans and documents into a single plan. The ATP will serve as a master plan and policy document to guide the development and maintenance of active transportation infrastructure including sidewalks, pathways, multi-use trails, and bikeways; the ATP will include the Safe Routes to School programs for the unincorporated county. Additionally, the ATP is expected to be one of the implementation measures for the County's Climate Action Plan. Please consider identifying transit improvements and ATP and Transportation Demand Measures (TDM) in the SANDAG Regional Plan and PEIR which will assist the rural unincorporated areas in meeting the region's greenhouse gas (GHG) emission goals.

Mr. Martin
January 13, 2017
Page 2

AIRPORTS

Incorporating the Regional Aviation Strategic Plan (RASP) and Airport Multimodal Accessibility Plan (AMAP) assumptions into the development of the Regional Plan is an important part of planning for the region's future transportation needs. Aviation travel is expected to grow substantially according to projections from the San Diego Regional Airport Authority and SANDAG. Please consider prioritizing the ground transportation network surrounding McClellan-Palomar and Gillespie Field airports to accommodate increased demand as San Diego International Airport nears operational capacity.

CLIMATE CHANGE AND GREENHOUSE GAS

The County is currently developing a Climate Action Plan for the unincorporated county. The largest GHG emission source in the region is the Transportation Sector. The County looks towards the Regional Plan to lead the efforts in reducing GHG emissions in the Transportation Sector. The recommendations noted are important for the local jurisdictions in meeting their share of the region's GHG emission reductions. The County and SANDAG, working collaboratively on the Regional Plan, can move towards an efficient and cleaner multi-modal transportation system. As it relates to SANDAG's Regional Plan, the County requests the following be considered:

- a. Analyze alternatives that address multi-modal transportation options for the unincorporated county, particularly as it relates to transit service and alternative fuel infrastructure;
- b. Analyze whether the developed/urban communities within the unincorporated county meet the Urban Area Transit Strategy;
- c. Analyze an environmentally sustainable transportation system that can reduce vehicle miles traveled, gasoline consumption, and GHG emissions, while providing alternatives modes of transportation for all economic sectors of our population;
- d. Clarify whether the Regional Plan GHG emission reductions will be consistent with the Air Resources Board (ARB) 2030 Target Scoping Plan; and
- e. SANDAG's 2015 Regional Transportation Plan incorporated the County's 2011 General Plan Update Land Use and Mobility Elements. Since 2011, the County has adopted several general plan amendments (GPA) to the 2011 General Plan. The County requests that SANDAG staff coordinate with County staff to ensure that the adopted GPAs are incorporated in the transportation models and growth forecasts for the Regional Plan and PEIR Analysis.

Mr. Martin
January 13, 2017
Page 3

MULTIPLE SPECIES CONSERVATION PLAN (MSCP)

The proposed Regional Plan covers areas that are critical to the County's Multiple Species Conservation Program (MSCP), both North and South County plans—including the assembly of a Preserve in each. The South County Subarea Plan was adopted in 1997; and the North County Plan is currently in development. As the Regional Plan encourages projects that are consistent with an SCS that achieves GHG reductions, we would anticipate that the PEIR would analyze the effects of the proposed Regional Plan on the MSCP South and North County plans, the assembly of the Preserve and full implementation of the plans. Any effect (direct or indirect) of the Regional Plan on the MSCP should be evaluated (and mitigated, if necessary). SANDAG staff should coordinate with County staff to best determine how to evaluate the MSCP South and NC Plan in the upcoming Regional Plan and PEIR.

PARKS AND RECREATION

The County's trails and pathway network provides safe, secure, healthy, affordable, and convenient travel choices between the places where people live, work, and play while reducing use of personal vehicles, thereby reducing GHG emissions. Please consider incorporating a discussion of the County's Community Trails Master Plan and encourage investment in trails and pathways that connect people with places where they live, work, and play.

VECTOR CONTROL PROGRAM

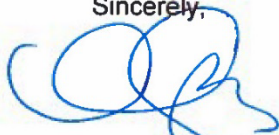
The County's Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP has completed their review and has the following comments regarding the Regional Plan.

1. The VCP requests that when implementing transportation projects or components of the environmental mitigation program, impacts from possible mosquito breeding sources are considered. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development.
2. For your information, the County's Guidelines for Determining Significance for Vectors can be accessed at http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf.
3. The California Department of Public Health Best Management Practices for Mosquito Control in California is available at <http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf>.

Mr. Martin
January 13, 2017
Page 4

The County looks forward to receiving future documents and/or notices related to this project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Danny Serrano, Land Use / Environmental Planner at (858) 694-3680, or via email at daniel.serrano@sdcounty.ca.gov.

Sincerely,



MARY KOPASKIE, Chief
Advance Planning Division
Planning & Development Services

Email cc: Michael De La Rosa, Policy Advisor, Board of Supervisors, District 1
Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Dustin Steiner, Chief of Staff, Board of Supervisors, District 3
Adrian Granda, Policy Advisor, Board of Supervisors, District 4
Melanie Wilson, Policy Advisor, Board of Supervisors, District 5
Vincent Kattoula, CAO Staff Officer, LUEG
Nick Ortiz, Project Manager, PDS
Everett Hauser, Transportation Specialist, PDS
Bulmaro Canseco, Planner, PDS
Jeff Kashak, Planner, DPW
Richard Chin, Associate Transportation Specialist, DPW
Eric Lardy, Chief, Community Health Division, DEH

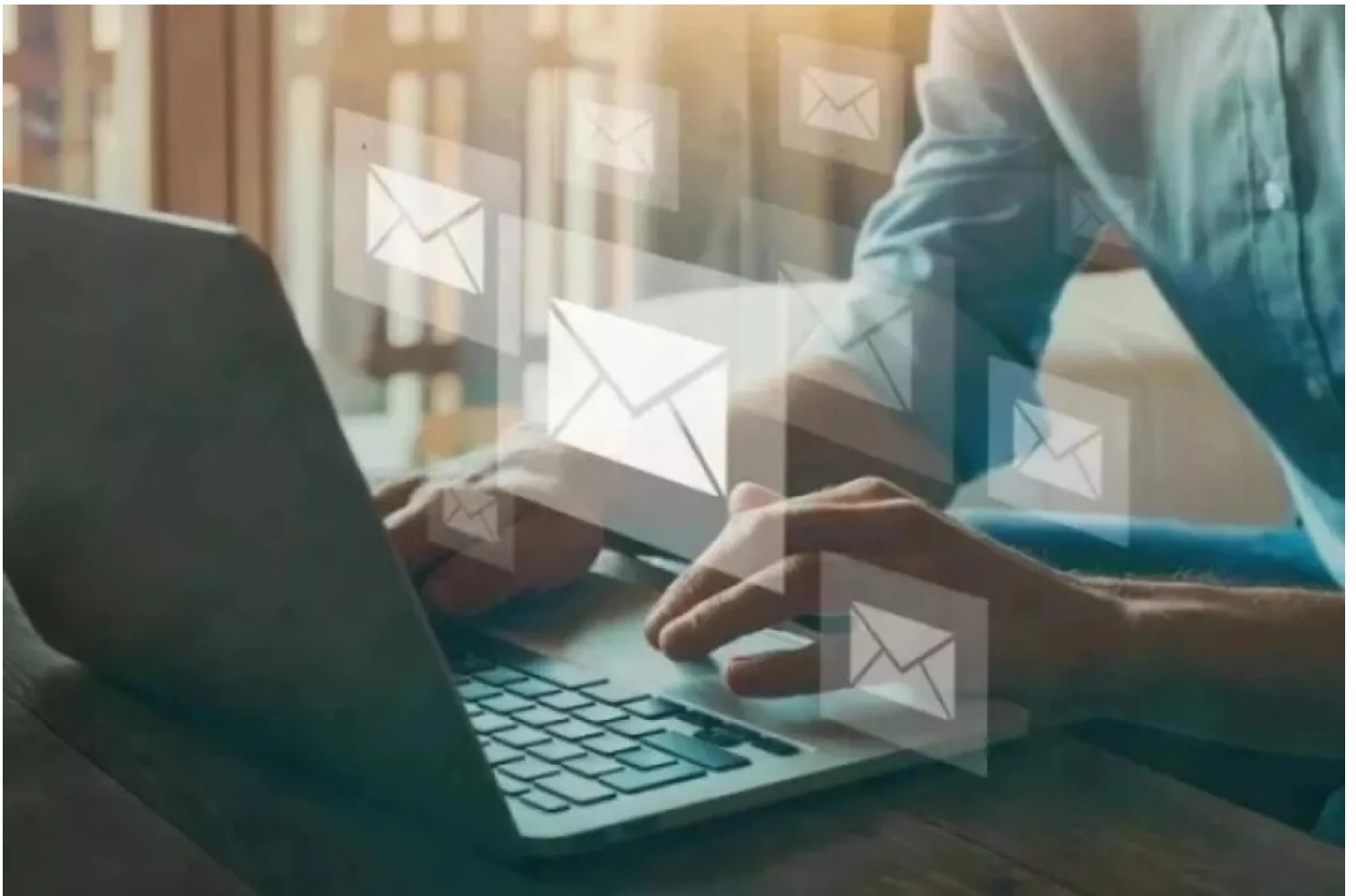
Reference

Provided by Dwight Worden



OPINION

Guest commentary: The road user charge has a place in our future transportation planning — at least for now



(File photo)

BY DWIGHT WORDEN

DEC. 2, 2022 2:56 PM PT



This guest commentary presents my personal opinions and does not necessarily reflect the views of my city or city council colleagues. *(1, see bottom)*

We need to reduce greenhouse gas (GHG) emissions: San Diego needs to reduce GHG emissions for our future survival and quality of life, and to avoid severe state and federal penalties if we don't. Transportation is the largest source of GHG emissions in our region at about 40% so we need to work on that sector.

The solution is a revamped transportation system: SANDAG has a comprehensive plan (2, *see bottom*) to do just that. It includes road and freeway projects, new rail service, improved bus service, accommodation for autonomous vehicles, support for electric vehicles, transit to serve work and other commuters, first and last mile options, bicycle and walking projects, environmental enhancements, and more. It will reduce our GHG emissions and meet local, state, and federal requirements. It will improve transportation options for everybody, reduce commute times, improve air quality, reduce congestion, and improve all aspects of our quality of life.

The challenge is money: What does it cost and how will we pay for it? \$160 billion over the next 30 years is the cost estimate. Before you choke on that number, recognize that it is estimated that climate change left unaddressed will cost the U.S. \$2 trillion per year (3, *see bottom*). So, think of the RTP in terms of its avoided costs. From a cost benefit point of view it's our least expensive option.

Payment strategies proposed in the RTP include a series of 1 or 1/2 cent sales tax ballot measures, use of TRANSNET funds, and federal and state funds. Nobody likes more taxes, but they will be subject to vote on the ballot. San Diego County voters already, twice, approved TRANSNET taxes to improve our transportation system. San Diegans know how to vote "yes" for a good plan and we know how to vote "no" on a bad one.

The Road User Charge or RUC. The RUC has garnered more attention than it deserves. Of the \$160 billion RTP price tag the RUC would account for only about \$14 billion or 9%. So, what is it and why is it so controversial?

A RUC is a charge by mile to use the road system.

—**Current gas taxes are a RUC.** While we may not call it a RUC, current gas taxes (5.6% or about 54 cents a gallon at current prices) are a form of RUC. You pay these taxes every time you fill up for the right to drive our road systems. The funds are used to improve and maintain our roads. The more you drive the more you pay. Toll roads are also a current form of RUC. RUCs are not new.

Problems with gas taxes.

—**We are transitioning to electric vehicles.** Transitioning away from gas to EV cars and trucks is a good thing. But, EVs don't buy gas so they don't pay gas taxes. Currently, they use the road system for free. Gas taxes to build and repair roads are declining and are not a sustainable source to take care of our roads.

—**Gas taxes are inequitable.** Even used EVs are expensive. It is the well healed who can afford Teslas and other EVs. It's the middle class and working poor who are stuck paying gas taxes with older, poor mileage, gas burners. Why would we burden this sector with the sole cost of road maintenance? That's wrong on many levels.

The solution: Replace gas taxes by transitioning to a system where everyone, including EVs, pays as they drive. That's called a Road User Charge.

—Such a system restores equity and sustainability. EV drivers and gas burners all pay to maintain our road system based on how much they use the road system. That's sustainable and it's fair.

—Gas taxes will continue to decline as more and more EVs take to the road. Those taxes need to be replaced if we value our road systems. Some type of RUC can be the answer. Done right, the overall cost to drive will go down as we replace gas taxes with lower user charges under a system where everyone pays a fair share including wealthy EV drivers.

—Nobody supports the current gas tax system plus a RUC on top, yet that is what some opponents would have you believe. These opponents create a straw man and then show it no mercy! A more productive discussion addresses what is actually proposed: developing a RUC that will work in San Diego to transition away from gas taxes to a system where everyone pays and the overall cost of driving for everyone can go down.

The RUC in the plan is a placeholder. The RUC in the RTP is a conceptual placeholder to pay for a small part (9%) of overall RTP costs.

—It's only a concept. We can't implement a RUC without state legislation that doesn't exist.

— If the state authorizes RUCs in the future, we will figure out the specifics of a RUC that will work for San Diego. That's what the RTP proposes. If we can't build consensus we can drop it or the voters can reject it.

— It's a mistake to take it off the table now before we even know what it will be.

I support the RUC concept set out in the RTP. I support studying it and developing specifics. Will I support its implementation? I can't say until we put flesh on the proposal. If it shows me that, overall, driver costs will come down, it is more equitable, and is sustainable, I will support it. If not, I won't.

Let's be realistic. If we want to meet climate goals and avoid state and federal penalties we need a plan like the RTP and a way to pay for it. Let's keep the RUC on the table for further study.

1. Dwight Worden is the current Mayor of the City of Del Mar and is a retired land use, environmental, and government attorney.

2. The 2050 Regional Transportation Plan or RTP adopted in December 2021.

3. <https://www2.deloitte.com/global/en/pages/about-deloitte/press-releases/deloitte-research-reveals-inactionon-climate-change-could-cost-the-world-economy-us-dollar-178-trillion-by-2070.html>

OPINION

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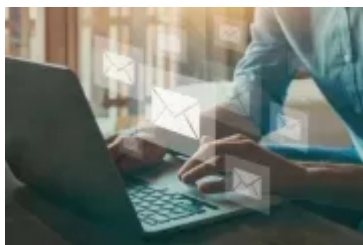
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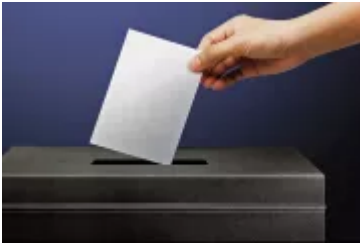
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