

Attachment E

Public Comments from Draft CMCP



All comments received during the 45-day public review period were reviewed by the project team. Any factual errors in the draft report or attachments were updated. New strategies that were requested during the public comment's periods were added to Attachment D. These strategies have not been incorporated into the final document list of strategies shown in Attachment A. That is because the projects have not been evaluated for feasibility, costed, or determined to meet the goals and objectives of the study. Projects added to Attachment D will be evaluated in future updates to the CMCP and also in the next Regional Plan.

Substantive changes made to the strategies include the deletion of the Nobel Drive Direct Access Ramp which was inconsistent with 2021 Regional Plan, adding transit operational improvements at Interstate 905 and Nobel, and moving the Managed Lanes along SR-52 between Interstate 805 west to Interstate 5 to a 2050 phase year due to lack of traffic congestion in the near-term. Duplicative strategies were resolved and reduced into one project.

TITLE VI STATEMENT

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No.	Date	Name	Agency	Comment Format	Comment
1	6/17/2022	Cristina Bingham	Declined to Answer	Online Comment Form	It would be nice to have a sound barrier along the I-805 between East Naples and Telegraph Canyon Road. It would improve the lives of the residents on Montcalm Street and Montclair Street. I know some sound walls have been built, but our neighborhood has been forgotten. We are far more densely populated and closer to the highway, than the population on southbound 805 north of East H Street.
2	6/17/2022	Paul	Declined to Answer	Online Comment Form	Having lived in the Southbay for 35 years and now the past 10 in North County, the same problems still exist. The addition of "carpool lanes" was not the fix on the 805 and will not be the fix in the future. Moreover, public transportation does not go where all people need to be in order to work. This project should be shelved until 2030 when there is a better understanding of how remote work will fall. Current ridership on public transportation takes too long even with express transit. A short term solution is to eliminate carpool only lanes until a better study of the region, people traveling, and where they work needs to be completed. Unfortunately, local government has missed the mark on more than a few occasions when addressing transportation. For example, Bus ridership is down over 10% while fuel costs continue to rise. There is no reason to increase public transit until the current situation is resolved which with the current inflationary market, be 10 years.
3	6/17/2022	Rodolfo Alejos	Declined to Answer	Online Comment Form	I'm an urban planning major and have lived in the south bay for my entire livelihood. Living in eastern Chula Vista has been difficult using public transportation to get to various destinations across San Diego County. However, ever since the 225 opened, it has improved public transportation where I live. But I believe it could be improved. Creating another line past the 94 and having a direct connection from the 805 to 15 using the dedicated bus lanes heading towards Miramar and north County. People in Eastern Chula Vista won't have to head to downtown to transfer onto another rapid adding more time to their commute. This new efficient route could prove beneficial to the rapidly growing Otay ranch and Eastlake communities who are heavily dependant on automobiles. I believe if there is an efficient and rapid way of commuting to north park, mission valley, Mira Mesa, and Escondido it would create an attractiveness to the line leading people to ditching their cars and using public transportation instead. Thank you.
4	6/18/2022	bob g	SVP, B&G;GCC V	Online Comment Form	lets get it done
5	6/19/2022	Michael Hemry	Declined to Answer	Online Comment Form	View draft
6	6/20/2022	Jackson Hurst	Declined to Answer	Online Comment Form	I approve and support the strategy's presented in the Draft South Bay to Sorrento (SB2S) CMCP especially the managed lanes on I-5 and I-805.
7	6/20/2022	Brett a Shoaf	Artistic Visuals	Online Comment Form	"My comment: There's more to improving San Diego's quality of transit than addressing the issues of connectivity, underserved communities, and developing an integrated transportation system. There's an overlooked vital concern that the CMCP did not address - allocating some of the project funds to improving the CONDITION of our existing roadways. I understand that the long-range goal of this plan is to begin to wean people off of gas vehicles to meet our climate goals by developing/promoting alternate modes of transportation - I get that. Simple fact is, our streets and freeways will be with us for some time during implementation of these ""green"" alternatives. Wouldn't it make sense to give some funding priority to these other concerns as well? San Diego residents and visitors would immediately benefit and thank you for it. Potholes, cracked and pitted streets, rough roadways -- we've all had our fill of this and want to see some action. Please give this its just consideration. As is, the CMCP mentions the following: ""Transit, goods movement, local roadway connections, highway connections, managed lane priorities, climate impacts, technology and bicycle and pedestrian transportation connections."" Sadly, it says nothing about much-needed repairs to improve the condition of our existing roadways, a significant oversight. Hopefully this can be remedied. Thank you."
8	6/20/2022	Thomas Francl	Declined to Answer	Online Comment Form	"The report's population and business projections do not take into account the numbers of people and jobs that are leaving San Diego and California in general. Using values from 2016 is dishonest and misleading. There are references to 2019 statistics, so why did the report not use those values? Further, recent studies indicate a net population DECREASE. Finally, why won't you admit where the funding is really going to come from: Mileage tax, Vehicle tax, Fuel tax, and Sales tax. Raising taxes during high inflationary and recessionary times hurts the very people you're trying to help."

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9	6/21/2022	Silvia Croft	San Diego State University	Online Comment Form	<p>"This comment is regarding document ""publicationid_4843-32272"" and Figure 14 ""Existing (2016) Land Use - South"" on page 34 which displays the site previously known as QUALCOMM stadium area as zoned mostly and primarily for recreation/open space.</p> <p>It would like to be noted that this is now the San Diego State University Mission Valley site and is currently zoned for:</p> <ul style="list-style-type: none"> - affordable housing - housing - commercial - recreation/open space, and other uses. <p>More information about the SDSU Mission Valley Master Plan can be found on pages 67-70 of the SDSU Mission Valley Implementation Plan document: https://missionvalley.sdsu.edu/pdfs/sdsu-mvip-all-chapters-7-13-20.pdf. Additional information can be found at https://missionvalley.sdsu.edu/community-engagement</p> <p>Thank you!"</p>
10	6/22/2022	Alexander Tahan	Declined to Answer	Online Comment Form	<p>"The proposed improvements look great, especially the new transit and active transportation improvements. The transit service in Sorrento Valley is especially important for reducing vehicle trips. I have a couple comments:</p> <p>a. Converting existing general travel lanes for managed and transit lanes instead of using shoulders or widening freeways would be much more effective for replacing SOV trips. This is really important to meet climate goals.</p> <p>b. The proposed rail tunnel to Sorrento Mesa seems duplicative of the UTC tunnel. I think it would save money, but achieve the desired connection to just have the UTC tunnel, with a short branch to Sorrento Mesa.</p> <p>c. Another proposed plan was to extend the Blue Line to Rose Canyon to connect to the Coaster. This seems to imply that there will not be a Coaster/Amtrak/Purple line station at UTC even though the tunnel will go directly under it. A station at Rose Canyon station requires a long walk uphill or an extra transfer to reach anything. A UTC station is much more beneficial, because of the many bus connections, and the walk/bike shed has much more around it. The skyway should also connect to UTC or UCSD transit centers so that everything connects at a central location.</p> <p>d. At a cost of \$9 billion, the blue line express does not seem worth it, especially with the parallel rail line and BRT routes. This money should be used to build a new rapid transit line in San Diego.</p> <p>I support the level of investment and priority given to transit and bike projects. However, I think the money can be spent more efficiently."</p>
11	6/23/2022	Kevin Napolitano	San Diego Voter	Online Comment Form	<p>"Ref No. 99: Make Fenton Pkwy bridge bike (and emergency/police) only, and open it to cars when flooding occurs. Allowing cars will have very little benefits and just lead to unnecessary congestion at the inefficient egress points of Cam Del Rio. Ref No. 10. Blue line through downtown is too slow. Needs to bypass downtown using green line (preferred) OR remove at least half of the downtown connections including One America Plaza which is redundant with Santa Fe Depot. Item 61: In favor of this proposal. For reference, it's actually as fast to take the trolley from Old Town to the VA and then hop on a bike to the SV train station than it is to take the Coaster. This is because the coaster line is very inefficient. Straightening this line will help not only people from the South Bay to SV, but also help improve connection from North County to DT. Please also consider extending Coaster to border. Item 1264 - Against this. No added stops for Amtrak as it is needed to get people to/from LA area. Item 783 - We need the bike tunnel under I-5 built ASAP. Item 1300 - YES. Sorrento Valley Road is perfect for a protected bike lane. That's about it. Thank you for reading."</p>
12	6/23/2022	Andrew Serrano	Declined to Answer	Online Comment Form	<p>Item 99 Fenton Pkwy Bridge should solely be for bike (and emergency vehicle/police) when there is no flooding.</p>
13	6/23/2022	Sergio Nevarez	San Diego Unified School District	Online Comment Form	<p>On bad days, children on school buses spend too much time both going to school and coming home due to freeway traffic. It may not be the best thing for MTS but it would be helpful if school buses could bypass traffic on the shoulder to help move kids across town, also.</p>
14	6/28/2022	Lauren Kershek	Declined to Answer	Online Comment Form	<p>In the first appendix of this draft CMCP, it looks like there are two planned projects to do with the Sorrento/Miramar tunnel: Reference number 61 and 62 on page 13 of the pdf. The table has the year 2035 for these projects, but my understanding was that it would be closer to 2050. Do you have any info about the expected timing? Thanks!</p>

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15	6/30/2022	Thomas	Declined to Answer	Online Comment Form	Instead of spending a ton of money on a "express" blue line, please extend the coaster and Amtrak using the currently abandoned train tracks all the way down to the San Ysidro border crossing. This would be much more economical and provide much quicker train times, a cross track connection could be made at the under development convention center station downtown, in Chula Vista at the H street station next to the Gaylord waterfront development (next to the abandoned train tracks), and at the San Ysidro crossing. Instead, use the money saved to build a blue line extension to CBX in the South (east from San Ysidro), and to extend the north end of the blue line to rose canyon where another Coaster station could be built. This would allow a quick comfortable ride all the way from the border crossing to rose canyon on the Coaster with a quick connection on the blue line for a few minutes to UTC. This would also greatly improve southbound traffic from north county as they could also use the same rose canyon station thus freeing road capacity for south county commuters. Currently North County residents have to take the Coaster all the way to old town to just jump on the trolley and ride back north which is very time consuming.
16	7/1/2022	Leah Schaperow	Declined to Answer	Online Comment Form	Whenever I go to purchase supplies for my small business in national City where the only clay/material supplier is located, I don't feel safe as I bike there from Hillcrest. Bike lanes come and go on high speed roads filled with trucks and cars. The place that I get my bike repaired and fixed up is in Imperial Beach. I need a safer route to bike there from uptown. There needs to be a connected network of protected bike lanes. I have tried taking transit, but it's dangerous to get from the trolley stations in Imperial Beach and National City to the places I need to go by bike or walking. Transit frequency needs to go up as well. I can't take transit to my workplace because the buses come so infrequency and are not reliable. I bike commute to work everyday, and parts of my commute are on protected trails and bike lanes. There are still parts of my route that need protection. I put together the safest route I could and I still am riding on some streets that I do not feel safe on.
17	7/2/2022	Edward Ritch	Declined to Answer	Online Comment Form	There need to be more east-to-west rooting down in Chula Vista. For my trip to work, I need just under an hour if I use transit and walk. But if I take a car it is only 15 min on a bad day and 10 most days. There should be a better way to get across Chula Vista
18	6/30/2022	Deborah Knight	Friends of Rose Canyon	Online Comment Form	<p>As a member of the South Bay to Sorrento Stakeholder Advisory Group, I am requesting that you extend the comment period by an absolute minimum of two weeks and preferably until August 15.</p> <p>The Draft CMCP contains an extensive list of projects, many of them not in the RTP and totally new to all of us. The Draft CMCP also contain information about where these projects are located and how they were evaluated. We only just had the meeting today about this document at which SANDAG staff explained to us what it is and what is in it and answered some of our questions. Yet we are being asked to meaningfully comment on this major document within the next two weeks on a document that has taken staff and consultants at SANDAG and Caltrans so much effort and expertise to create.</p> <p>It was obvious at the meeting today that there are a number of engaged stakeholders who have basic questions about this document. This includes a number of organizations from communities of concern. Many of us will need time to understand and evaluate and draw up meaningful comments on this document. Some of us will likely have follow-up questions before we can complete this task.</p> <p>I proposed this in the chat and the end of today's session, and Randy Torres-Van Vleck from City Heights CDC seconded my request. The extension to August 15 will provide stakeholders to provide significantly more meaningful input.</p> <p>Thank you.</p>
19	7/7/2022	Deborah Knight	Friends of Rose Canyon	Online Comment Form	<p>Jennifer,</p> <p>Is the Sorrento to Miramar Phase II project on the list in this Draft CMCP?</p> <p>Reference number 730 is for ""LOSSAN Corridor Improvements within the SB2S Study Area" with a large area shown on the map for it." But it does not specify any projects.</p> <p>Thanks,</p> <p>Debby</p>
20	7/8/2022	Nadia de la Garza	Declined to Answer	Online Comment Form	Please build an additional freeway or open up the toll road.

No.	Date	Name	Agency	Comment Format	Comment
21	7/13/2022	Shannon Fiala	California Coastal Commission	Online Comment Form	"Thank you for the opportunity to comment. Commission staff have two concerns with the draft CMCP. a. First, in Table 3.1 on page 33, under the Goal of Sustainability, Health and Resilience, CCC staff are supportive of the objective of improving the resilience and state of good repair of the transportation system. However, ""daily person throughput on transportation facilities in high-risk (sea-level rise, flood, or wildfire) areas"" does not seem like an effective performance measure to support that objective. Is the implication that the transportation facilities that are most heavily used should be prioritized for sea level rise adaptation? If so, there are many other factors that should be weighed in prioritizing adaptation planning throughout the project area, such as the importance of the route for corridor/network function, importance to disadvantaged communities, route redundancy / emergency evacuation routes, and the impact of the transportation facilities on adjacent ecosystems as sea level rises, i.e., coastal squeeze, etc. Wouldn't a more effective performance measure focus on the simply improving the resilience of transportation facilities in high-risk (sea-level rise, flood, or wildfire) areas, rather than on the daily person throughput? b. Our second focus on the proposed strategies in Attachment 1. For the strategy titled ""Protect SR-75 from Climate Change Impacts (Reference Number 92),"" although Commission staff encourage and applaud the proposed use of coastal restoration techniques to decrease impacts from sea level rise and erosion (as well as NBAS under #701) and are supportive of analyzing the elevation of SR-75 as well as phased relocation/retreat, we would like to note that armoring the Imperial Beach coastline and groins would require extensive alternatives analysis to demonstrate that it is the least environmentally damaging alternative (as well as under #807). Nourishment also can present implementation challenges and the potential impacts to the beach ecosystem as well as grain size compatibility would need to analyzed (as acknowledged under Strategy #806). This strategy appears to be overlapping / redundant with #804 Regional Beach Sand Project (RBSP) III. Could the draft CMCP clarify how the two strategies are related? Similarly for the strategy titled ""Protect Harbor Dr from Climate Change Impacts"" (Reference Number 599), sea walls would also need to be demonstrated to be the least environmentally damaging alternative, and nature-based solutions would be highly encouraged to protect critical roadway networks. The strategy titled ""Protect Arterial Routes in Imperial Beach from Climate Change Impacts"" (Reference Number 413), is unclear because it states that certain streets will be ""protected... to accommodate increased flooding."" Is the proposed strategy to protect the roadways, i.e., by armoring them or with nature-based solutions, or is the proposal to accommodate flooding, i.e., through elevation or improved drainage? Thank you again for the opportunity to comment."
22a	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	Thank you for inviting me to attend the South Bay to Sorrento presentation! I found it to be very enlightening and educational. I wish to re-hash the comments I made during the presentation, as well as add a few more that I wasn't able to add at the time. Purple Line / Light Rail - a. * The demand for public transit, as well as safe transit by bicycle, greatly exceeds supply in City Heights. It is paramount that additional public transit options, as well as extended options to safely traverse City Heights by bicycle, are extended to - and beyond - City Heights.
22b	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	b. Ref 3. * The Purple Line is a sorely needed light rail extension. A significant number of people in City Heights regularly commute to / from Clairemont Mesa for work, and to / from Tijuana to visit friends and family.
22c	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	c. * Connecting the Purple Line to the Coaster near UTC would give residents of City Heights a direct rail link to North County, enabling 2-seat rides by rail all the way up to Oceanside. This would benefit City Heights residents greatly.
22d	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	"d. Ref 3.* In order to maximize the success and ridership of the Purple Line, SANDAG should consider putting the City Heights station as close to Fairmount and University Aves as possible, preferably ON the corner of University and Fairmount, with a secondary station at the current El Cajon Blvd rapid bus station on I-15 to serve as a connection to Rapid 215 and 235. The reason for this is because Univeristy and Fairmount has long been considered the ""downtown"" of City Heights. As such, it is a common destination for many people, and having a single-seat ride directly to ones destination will attract significantly more ridership than a 2-seat ride via rail and then bus. * Placing the Purple Line City Heights station on Fairmount and University would also serve a significant number of people who live in public / subsidized housing, greatly increasing equity. "
22e	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	e.* An east-west light rail line, connecting the Purple Line to the Blue line via Normal Heights / North Park / Hillcrest should be considered in the future.
22f	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	"f. Ref 75. Rapid 235 should be upgraded to a dedicated light rail line connecting Escondido with Downtown San Diego "
22g	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	"g. Ref 15. Rapid Bus 10 *Future Rapid bus 10 should run in dedicated bus lanes as much as possible. Major intersections should have dedicated rapid bus signaling to give Rapid Bus 10 priority over other traffic. * Rapid bus 10 should be extended to the Blue line station in Old Town. "
22h	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	"h. Bus 965 - * Bus 965, City Heights Circulator, should be bi-directional "
22i	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	"i. Ref 64. Proposed Ferry Trunk Route - * The proposed Ferry Trunk Route would be an excellent alternative to I-5 for those commuting to / from the South Bay to the Naval Base on Coronado and / or SD International Airport via Harbor Island, and absolutely deserves more study. The biggest challenge with the ferry would be connections to other forms of transit - if possible, ferry stations should be at or near rail stations, with dedicated / separate Class IV cycleways in between to facilitate safe bicycling. * An extension of the Ferry Trunk Route to Pt. Loma to serve those who commute from the South Bay to the Naval Base in Pt. Loma should be considered for the future. An extension south to Imperial Beach should also be considered. "

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22j	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	"j. Freeways - * Freeways should NOT be widened. Not only is freeway widening extremely expensive, it is also very destructive to the environment and to the communities surrounding said freeways. * Some freeway lanes on I-5, I-8, I-15, CA-94 and I-805 should be converted to Carpool / HOV lanes, not only to encourage carpooling, but also to disincentivize car use and encourage public transit use. * The freeway system in San Diego in general is in desperate need of managed lane connectors "
22k	7/14/2022	Brenden Sickler	City Heights Area Planning Committee	Online Comment Form	"k. Ref 786. Bicycle and Road Infrastructure - * City Heights badly needs upgraded bicycle infrastructure. The existing bicycle infrastructure in City Heights is woefully inadequate. * The upcoming University Bikeway should be a Class IV cycleway. Class IV cycleways promote bicycle safety and equity by eliminating the ""wrong way"" problem, wherein someone who is a minority is more likely to get a ticket for riding their bicycle the wrong way on a street. * The Landis Bikeway should be extended to Euclid Ave. * Euclid Ave, between Orange Ave and Myrtle Ave, should either be converted to an Edge Lane Road (like Gold Coast was before it was taken back), or parking on one side of the road should be eliminated and a two-way Class IV cycletrack should be installed. The speed limit on Euclid should be reduced to 20 from its current 30 mph, and additional improvements for walkability should be implemented (crosswalks at Myrtle, Dwight, and Auburn). The purpose of this is to facilitate safe bicycle usage for children who attend the multiple elementary schools along / near that corridor, as well as the numerous people who would use that corridor to connect to other parts of City Heights. * A roundabout should be installed on the intersection of Landis/Castle and Euclid Ave. Either that, or an island (with a crosswalk / bumpers), similar to the one installed on Landis and 30th, should be installed to prevent left hand turns on that intersection and to facilitate pedestrian / bicyclist use. * Separated bike lanes should be installed on Fairmount Ave, between Home and El Cajon. Separated bike lanes, as well as contraflow bike lanes, should be installed on 43rd Street. * The bike lanes on the Fairmount Expressway north of El Cajon Blvd are dangerous and need to be physically separated from traffic. Traffic on that road moves at freeway speeds and the bike lanes on Fairmount Expressway are categorically unsafe. * Lantana Drive / Dwight Street should be converted to a one-way street, with Lantana Drive going East / South, then connecting to Dwight Street which would go West. Lantana Drive south of Dwight Street should remain two-way. * Additional bicycle / pedestrian bridges should be built over I-15 and I-805, specifically to connect Fairmount Park with Azalea Park over I-805 and with South Park over I-805 * Extend Home Ave southbound to Market Street, and install dedicated bike lanes on Home Ave connecting City Heights and Mountain View by bike. That is all for now. Thank you for your consideration - I look forward to the next SANDAG presentation. - Brenden Sickler, Chairman CHAPC"
23	7/14/2022	Sriram Nagesh Nookala	Declined to Answer	Online Comment Form	The project looks good especially with improvements to be done around Sorrento Valley station: Adding it back for Amtrack; Increasing commute to this place. Also adding a sky bridge from UCSD to MiraMesa is interesting. I am interested in getting some details about that.
24a	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	" http://documents.coronado.ca.us/WebLink/docview.aspx?dbid=0&id=65097&openfile=true Also mailed. Thank you, City of Coronado City Manager's Office 619-522-7335 https://sandag.sharepoint.com/sites/cmcp/Shared%20Documents/Forms/AllItems.aspx?id=/sites/cmcp/Shared%20Documents/2.0%20South%20Bay%20to%20Sorrento/6.0%20Documentation%20Preparation/6.1.3%20Draft%20Report%20and%20Presentation/Comments%20via%20letter%20or%20email/City%20of%20Coronado%202022-07-14%20South%20Bay%20to%20Sorrento%20CMCP%20Comment%20Letter.pdf&parent=/sites/cmcp/Shared%20Documents/2.0%20South%20Bay%20to%20Sorrento/6.0%20Documentation%20Preparation/6.1.3%20Draft%20Report%20and%20Presentation/Comments%20via%20letter%20or%20email a. In Attachment 1, Section 3.3.1 titled ""Strategy Refinement Approach and Outcomes by Priority Focus Area,"" the language acknowledges the City of Coronado's request for the mobility hub to be removed from consideration. Strategy Number 788, titled, ""Coronado Mobility Hub AT Network,"" is listed as a project phased for year 2035. The ""Coronado Mobility Hub AT Network"" strategy indicates that the proposed mobility hub has strong public support. This is incorrect. Staff is not aware of any notable support among Coronado residents and this statement should be revised accordingly "
24b	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	"b. CMCP Executive Summary - Page 9: ""The overall cost of all 331 strategies recommended is \$59 billion, with approximately half the cost \$25M currently programed in the 2021 Regional Plan by 2035.""Comment- The referenced \$25M should be a ""B"" for billion."
24c	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	"c. Attachment 1, Recommended Transportation Solution Set, Strategy #53, Route 910: Comment- Confirm that this route is in addition to the current MTS Route 901 and will not replace this route. Attachment 2 - Planning Review and Corridor Performance Technical Memo: "
24d	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	d. Comment- Figure 4 (map). Forecasted Population Growth: This figure forecasts a population decrease where there is currently military housing at Silver Strand and Leyte Road. The shaded area along the Silver Strand also encompasses San Diego bay waters and the land area should be delineated apart from the bay waters to avoid confusion and misrepresentation of developable areas.
24e	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	e. Comment- Figure 6 (map). Forecasted Job Growth - The 2035 job growth forecasts increased jobs in a residential neighborhood area bounded by Ocean Boulevard, Coronado Avenue, 6th Street, and Alameda Boulevard where there is no employment center. Clarify or correct this discrepancy.
24f	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	f. Comment- Figure 11 (map). Social Equity Focus - Senior Population - Why does the Naval Amphibious Base indicate a high senior population?

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24g	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	g. Comment, Section 4.2, Page 3 1 and Section 4.4.7, Page 75- Why does the document pair Coronado with Imperial Beach and the other San Diego bayfront Cities? These are different cities, with different settings and challenges. Provide a clearer distinction and description of City of Coronado and Naval Base Coronado jurisdiction, and Caltrans right-of-way. Why are Naval Base San Diego and portions of San Diego, National City, and Chula Vista bayfront areas discussed in the Coronado/Imperial Beach section? Coronado should be described in its own section separate from Imperial Beach and Naval Base San Diego.
24h	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	h. Comment - Bifurcate Coronado and Imperial Beach including the other bayfront communities in the subarea analysis. The City of Coronado is a built-out city and housing growth will be nominal, not more than 2 to 3 percent (see Table 8, p. 100). The City of Coronado is not a disadvantaged community, and low-income populations in the City are lower than the 50% cited in the Table 9 (p.101). The senior population in Coronado should be projected to over 20 percent. Eight percent is not accurate and not representative of the local Coronado senior population (Table 10, p.102)
24i	7/18/2022	Tina Friend	City of Coronado	Online Comment Form	i. Section 5.1.3, Page 83 - "Industrial land uses primarily exist in Sorrento Valley, Kearny Mesa, Coronado/Imperial Beach, and the U.S.-Mexico Border." Comment - There are no industrial uses in Coronado. Does this reference only include industrial uses in Imperial Beach and/or include military operations? Please clarify in the report.
25	7/18/2022	Melissa Escaron	California Coastal Commission	Online Comment Form	Hello- I realize the airport is not within the South Bay to Sorrento CMCP planning area, but I was surprised to see no mention of traffic impacts resulting from the upcoming airport expansion, and the anticipated impacts on roadway and highway traffic congestion within the coastal zone. I think this CMCP should refer to the expected traffic impacts resulting from airport expansion, and what is being proposed to manage the congestion. Thank you.
26a	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	a. Page 15 Assessment of needs should include: Access to automobiles, Access to quality transit, Access to low stress bike facilities, Availability of sidewalks/walking paths. It appears the analysis of areas of need included these layers, but they're not displayed in the graphic.
26b	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	b. Page 16 Indicate direction of peak travel.
26c	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	c. Page 18 Please define where the definition of equity focus communities is from: state, SANDAG, other?
26d	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	d. Page 18 Please define what the "areas of influence" are, and how they are used for this study?Pages 20,24 Suggest changing wording from "will" to "is expected to"
26e	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	e. Page 24 Last bullet point referencing dominance of auto modes is not worded to describe a land use. Suggest rewording the bullet to emphasize that much of the area is planned to remain low density, without a significant increase of land use diversity. These conditions are difficult to attract transit users and also do not promote walking and biking as mobility options.
26f	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	f. Page 25 In figure 2.6, the mode availability should provide criteria about why a mode is not available. For example, transit between Chula Vista and Sorrento Valley can be made off-peak by bus and Trolley in less than 2 hours, and by bike approximately 2 hours and 20 minutes; whereas a private auto can make the trip in approximately 40 minutes. Perhaps a criteria of 3x's the automobile travel time would make the mode unavailable?
26g	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	g. Page 27 Promoting supportive density and diversity of land uses is a strategy to promote non-auto mobility uses. Supportive land use is a strategy mentioned in 1310 Strategy for San Ysidro.

No.	Date	Name	Agency	Comment Format	Comment
26h	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	h. Page 28 Rather than a focus only to connect mobility hubs, we recommend that the gaps in the regional bicycle and pedestrian network be completed to promote access to/from multiple destinations.
26i	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	i. Page 30 "Study Area" is mentioned in the Military section. Should this be "Corridor"?
26j	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	j. Page 42 In the survey question, "Connecting Affordable Housing and Jobs" is not consistent with the summary section on page 40, that lists "Connecting Affordable Housing and Jobs (land use)". Should land use be included on page 42, or deleted from page 40?
26k	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	k. Page 44 Item #3 – typo in first line – merged words
26l	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	l. Page 45 Identify that Route 582 is LRT or some other TBD form of high-capacity transit.
26m	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	m. Page 47 Are the erosion and sea level rise improvements intended to mitigate or address or other (?) impacts? The sentence is unclear.
26n	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	Recommended Transportation Solution Set Comments:
26o	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	n. Project Number 526 City of National City would like to coordinate efforts with SANDAG and Caltrans, especially as this project is listed as being implemented by 2025. City of National City recently prepared
26p	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	o. Project Number 58 Description implies that there is existing bus service on 8th Street, east of Highland Avenue. City does not believe there is existing bus service on 8th, east of Highland.
26q	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	p. Project Number 59 There is no existing bus service on L Street. Recommend enhancements to service on Highland Avenue instead of L Avenue.
26r	7/14/2022	Matthew Capuzzi	CR Associates on behalf of City of National City	Comment Form	q. General Please include City of National City's planned free shuttle network in the project list and provide funding for this service.

No.	Date	Name	Agency	Comment Format	Comment
27	7/20/2022	Assistant Chief Ron Seldon and Lieutenant Joseph Aboy	California Highway Patrol	Online Comment Form	I would be in support of an increase in public transportation systems throughout the San Diego Area. This will make travel more accessible for people who need to move through the region and reach a destination safely and within a certain amount of time. The addition of more public transportation can also potentially reduce traffic if a significant number of people actually utilize the public transportation system. The major concern from the California Highway Patrol (CHP) would be to ensure these transportation systems are constructed with the safety of the passengers and the motoring public traveling next to these public transportation systems as the first priority. Moving forward, we would request an ongoing partnership and dialog with the CHP so we can ensure the upcoming construction meets the necessary parameters, which will address our regional concerns and overall traffic safety.
28	7/20/2022	Isaac Morales	Declined to Answer	Online Comment Form	There should be a proposed transit route that will connect Otay Ranch to Sorrento Valley, or to the rest of the greater San Diego area. There needs to be more options instead of just rapid bus routes to connect a large, growing area of the county. In addition, there needs to be more attention called to making neighborhoods throughout the study area more walkable. To truly combat the climate crisis, SANDAG must make San Diego less car dependent and give residents the sense that they do not need a car to thrive in the city. We have constructed our city to be supported by cars, it is now our job to slowly erase the need for them.
29	7/26/2022	Erika Pollner	Declined to Answer	Online Comment Form	This is a critical transportation corridor, glad to see the focus on mass transit options. Wish there was more info about safe bicycle commute options.
30	7/26/2022	xiaoqiang zeng	Declined to Answer	Online Comment Form	Many residents complained about the new biking lanes that eliminated many parking spaces, but are rarely used. Even in high residential density areas such as down town and UTC, we see very few people use the bike lanes. I think it's better to wait until we see there are enough people use the existing bike lanes before we build more bike lanes elsewhere. It's an unproved idea so far. If we applied this unproved idea city wide, it may be a big money waste.
31	7/27/2022	Michell Thitathan	Declined to Answer	Online Comment Form	Thank you for letting the public review this important mobility corridor plan! I commute mostly by bike and public transportation, and look forward to having better and more convenient access to much of the areas around the corridor. It looks like J St in Chula Vista will be the designated bike route. Would you also put signs along H St approaching the 805 interchange in both directions to divert cyclists/bike commuters away from that dangerous intersection? (It is super nasty, especially in the westbound direction, with the I-805 southbound off-ramp merging in... on a climb, and nowhere for bikes to go). I've survived that intersection before and know to not go thru there again, but people that are new to bike commuting should get some warning (both E St and J St are good alternatives to crossing the 805 by bike). People that usually drive tend to not notice dangerous-for-bikes area like this (the same as people who bike commute exclusively tend to no longer notice if the freeway onramp they want to get to is on the left or the right side of the street they ride on everyday. They'd just notice the ramp, but couldn't care less if it's eastbound or westbound).
32	7/27/2022	Aaron Brian Donovan	Declined to Answer	Online Comment Form	more trolley service and bus rapid routes. Need to have express trolley. for most people taking the trolley it takes approximately atleast 1 hour to get to their destion if not more
33	7/28/2022	Bill Sandke	City of Coronado	Online Comment Form	Your corridor map ignores San Diego Bay, the cheapest right of way available to transportation planners. Additionally, while access to Coronado is considered, meaningful ways to reduce GHG and VMT generated by military base commuters is sorely lacking. Please consider making the center lane of the bridge a full time car pool lane to promote ride sharing as there is little incentive now with plentiful use parking on each of our 3 bases. Coordinate with Chula Vista, National City and Coronado to ease the pain inflicted by base commuters and more aggressively address with the Navy these impacts.
34	7/29/2022	Anonymous	Declined to Answer	Online Comment Form	I am in support of anything that increases equitable mobility and decreases cars driving. I hope connections planned in a future purple light rail line are effectively connected to the network of other transit. I hope that areas of future stops are liberated to fewer zoning density requirements. I hope other projects like a Pacific Beach/Kearny Mesa light rail or bus rapid transit can improve an overlapping rapid transit network to improve reliability.
35	7/29/2022	George Lizarraga	Declined to Answer	Online Comment Form	As a daily commuter from Chula Vista to Sorrento Valley, I couldn't be happier to see this project in the planning phases. During the planning and action phase, I would like to recommend an interim solution that could bring only higher interest from commuters and business alike to further support this project. Start a new Rapid Transit Bus route from Chula Vista, (Otay Ranch Mall or Plaza Bonita Mall) to non stop Rapid Transit Station near Sorrento Valley Road or the Sorrento Valley Train Station Depot. This Rapid Transit buse would traverse on a HOV lane (near future, I hope) to and from these designated station during high traffic hours. These Rapid Transit buses should be equipped with bike racks, or allow bikes on board to further promote biking paths to the commuters final destination. This Rapid Transit bus would provide hundreds of employees around the Biotech community and UCSD students a means of transportation to and from the South Bay. I'm sure this system would be highly recommended and supported by large companies, government entities, and educational institutions in the area.
36	7/29/2022	Richard Magana	San Diego Transportation Equity Working Group (SDTEWG)	Online Comment Form	Please pass this very common sense plan that should have been the case years ago. Also please be sure that whoever is in charge of monitoring has to wear a body camera to ensure the public's safety and that they are trained to deescalate and assist the unsheltered communities they will be interacting with. It is unfortunate that even needs to be stipulated.

No.	Date	Name	Agency	Comment Format	Comment
37	7/29/2022	LORI SALDANA	California Assemblywoman (retired)	Online Comment Form	A. Please seek funding to provide hand-washing stations and public restrooms at every transit station, as well as along pedestrian and bike pathways. - As COVID, Hepatitis & now Monkeypox are showing us: As more people walk and use trolleys, busses, and bikes to get to work, school and do errands- they will also need restrooms & places to wash hands to reduce the spread of illness in shared transportation systems.B. Another emerging issue: With climate change, cyclists & pedestrians will need sheltered areas to get out of heat, rain, wind, cold etc. Weather patterns are changing. People will need access to shelter at transit stations in case of dangerous heat, cold, or stormsC. Finally: Hire only sworn officers who are POST certified to provide security and assistance -not harassment- in transit stations. Require they wear body-worn cameras and are held accountable to the public under state law, the same as other public agency law enforcement officers.
38	7/29/2022	Matt Schalles	Declined to Answer	Online Comment Form	A. Thank you for making active transportation & transit leap, major elements of your plan. B. As a scientist who works with high dimensional datasets and machine learning, I am skeptical of the role that your 'Next OS' element can actually deliver. C. We know what are the driving forces behind green house gases, and we know what are the drivers of inequity. What the climate and housing crises demand is not incremental change, but a fundamental shift in how we move people and goods. SANDAG offers a bold vision for transit in the county, but I do not see enough of the machinery in place to implement this on a timeline that can make a difference, when we still allocate as much money as we do to car infrastructure. D. We've seen what happens to bank accounts with the rising cost of gasoline. E. We know from advanced modeling that even with a switch to an all electric vehicle fleet, there is still an upper limit to vehicle miles traveled we have as a species, if we want to hit even our modest climate goals. We can address both of these by prioritizing transit and active transportation. F. Why are we even addressing congestion and the flow of cars through freeway connections? Just because it is a public concern does not mean it is the right thing to do in the face of these crises. G. Likewise, you know how important it is to efficiently move goods for our local economy, even if the stakeholders rank it last on their list. Where are solutions to shift goods out of trucks and back to light rail and smaller more nible fleets, including electric cargo velomobiles, to solve the last mile problem for goods? H. You highlight complete corridors, but are they really complete without significant active transportation? I. Why are we not throwing everything we have at mass transit and active transportation to solve the last mile problem? J. In places where you highlight active transportation, why would you focus on improving already decent areas like Coronado to Imperial Beach? We need better walkability and bikeability all along the inland corridor - the beach corridor is fine for now. Help buy time against rising sea levels by transforming the interior corridor, and then go back to robustify the coastal areas. K. Our children and our grandchildren deserve better. Can you honestly look at them and tell them you did everything in your power to set right the decades of climate inaction and increasing economic disparity?
39	7/29/2022	Enrique De La Cruz	Groundwork San Diego - Chollas Creek	Online Comment Form	"The South Bay to Sorrento Corridor is an important corridor that runs throughout the many diverse communities this project area incorporates. Thank you for addressing the response to the release of a document labeled "Recommended Transportation Solution Set" in the South Bay to Sorrento Comprehensive Multimodal Corridor Plan. My name is Enrique De La Cruz, and I am the Community Engagement Manager for Groundwork San Diego -Chollas Creek. A. Our freeway system has continued to separate communities and this plan still is planning larger ramps and more VMTs through these environmental justice communities and it is time to stop and rebuild a better system to reconnect these communities."
40	7/29/2022	Enrique De La Cruz	Groundwork San Diego - Chollas Creek	Online Comment Form	B. Providing on-street bike networks and trails connecting to the Chollas Creek Regional Park, San Diego River, the Rose Creek Watershed, Sweetwater River and the Otay River Valley should be the vision for improving mobility, clean water, and outdoor space for quality of life for all residents in this corridor study.
41	7/29/2022	Enrique De La Cruz	Groundwork San Diego - Chollas Creek	Online Comment Form	"C. Building a park over the 94 is a great example to provide access and connectivity between communities that have been separated by our freeway system. Thank you for taking the time to take comments from the residents of San Diego County on this important issue! Enrique"
42	7/29/2022	Andrew Wiese, PhD	SDSU	Letter	Letter Attached.
43	7/29/2022	Lynnette Tessitore	San Diego County	Letter	Letter Attached.
44	7/29/2022	Jesse Ramirez	City Heights BET	Letter	Letter Attached.
45	7/29/2022	Tina Friend	City of Coronado	Letter	Letter Attached.
46	7/29/2022	Carolina Martinez	Environmental Health Coalition	Letter	Letter Attached.

No.	Date	Name	Agency	Comment Format	Comment
47	7/29/2022	Sierra Club San Diego, Friends of Rose Canyon, San Diego Bicycle Coalition, San Diego 350, Climate Action Campaign	Sierra Club San Diego, Friends of Rose Canyon, San Diego Bicycle Coalition, San Diego 350, Climate Action Campaign	Letter	Letter Attached.
48	7/29/2022	SDTEWG, City Heights Community Development Corporation, Environmental Health Coalition, Mid-City CAN, San Diego 350	SDTEWG, City Heights Community Development Corporation, Environmental Health Coalition, Mid-City CAN, San Diego 350	Letter	Letter Attached.
49	7/29/2022	Shute Mihaly & Weinberger LLP on behalf of Friends of Rose Canyon	Shute Mihaly & Weinberger LLP on behalf of Friends of Rose Canyon	Letter	Letter Attached.
50	7/29/2022	Nicole Burgess	Active Transportation Advocate	Letter	Letter Attached.

From: [Andrew Wiese](mailto:Andrew.Wiese@sandag.org)
To: CMCP@sandag.org
Subject: Comment
Date: Friday, July 29, 2022 5:01:00 PM

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

July 29, 2022

cmcp@sandag.org

To whom it may concern:

I am submitting comments on the Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan.

Specifically, I strongly urge SANDAG to remove project 08, page A7, "Skyway – UCSD to Sorrento Valley" from the Draft SB2S CMC Plan.

This proposal is a novelty and a distraction from key strategies and priorities.

- 1) SANDAG should be wary of the fetishism of attention-grabbing but unproven transit technology.
- 2) The shifting rationale for this concept reveals a troubling disconnection between the proposal and any specific transit problems that it may be intended to resolve. The purpose and justification appear to have changed, suggesting that proponents appear to be more attracted to the concept than to its utility or to data supporting its utility. In earlier versions design and data linked to the SANDAG skyway focused on a rail-to-jobs connection – the Coaster to employment hubs in Sorrento Mesa and UTC. Subsequent evaluation of the project as part of the preparation of the SANDAG RTP led to its removal from consideration. The new "UCSD to Sorrento Valley Skyway" is in a similar location, but its potential efficacy is unstudied.

3) Available data suggests the limited utility of this new rationale. Current transit (bus) ridership figures for commuters from MM to UTC are VERY LOW. Prior to the COVID Pandemic the MTS **237 bus line** *as a whole* carried about **1,000 passengers per weekday**. It is unclear that **a \$141 million dollar project will substantially increase transit ridership in this direction, and it is especially unclear that any increases might be larger than could be achieved through other less expensive and proven methods, such as** fast, state-of-the art, MM-UTC bus services. One thing is certain, \$141 million spent on a skyway would limit the amount available for upgrades in the existing transit network, (such as our bike, ped and bus

infrastructure that has always taken a back seat). **Overall**, SANDAG should be deeply skeptical that the potential ridership is sufficient to justify a multi-million-dollar infrastructure project of this kind.

4) SANDAG should reject this “pie in the sky” project because the technology is largely unproven and there are few if any truly comparable cases. Planners have expressed general skepticism for such projects in the field. *Planetizen’s* James Brasuell describes urban gondolas as distractions “from the realities of transit,” as, which threaten to divert limited resources from critical community priorities and needs.

US metros that have given ‘skyways’ a closer look – Austin, D.C., Cleveland have passed on the idea. Speaking as a native of the latter town, I would say that *'It bombed in Cleveland'* is not a good place to start planning transit in San Diego.

5) SANDAG should reject the skyway as a contribution to continued inequity in our metro transit system. SANDAG should not be planning for a multimillion dollar investment to connect two relatively affluent north city communities, while transit riders in our EJ communities wait in line.

6) The Skyway raises serious environmental concerns: the overhead right of way, impacts on private property owners and the environmental impacts on Roselle canyon, on the coastal zone headlands, the viewshed, etc.

So far, the citizens have we’ve not seen evidence that make this idea – much less this new and unstudied variation - seem like much more than a planner’s novelty and a distraction from many other important ideas and pressing needs in this mobility plan.

Andrew Wiese, PhD.
2936 Gobat Avenue
San Diego, CA 92122



County of San Diego

PLANNING & DEVELOPMENT SERVICES
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DAHVIA LYNCH
DIRECTOR

July 29, 2022

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

Sent via email to: cmcp@sandag.org

REQUEST FOR COMMENTS ON THE DRAFT SOUTH BAY TO SORRENTO COMPREHENSIVE MULTIMODAL CORRIDOR PLAN (CMCP) FOR THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)

To Whom It May Concern:

The County of San Diego (County) staff reviewed the San Diego Association of Governments' (SANDAG) Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan (CMCP), received on July 18, 2022.

County staff appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

GENERAL

1. The unincorporated area communities represent significant populations with higher-than-average Vehicle Miles Traveled (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. The South Bay to Sorrento (SB2S) Comprehensive Multi-modal Corridor Plan (CMCP) projects and strategies that integrate active transportation, transit services, and the deployment of technology to better manage traffic and incident management needs throughout the corridor's planning area should also consider ways to improve transportation safety, increase travel choices, and improve mobility for unincorporated area residents, including for those that are located along and in close proximity to the Corridor such as residents of East Otay Mesa, Bonita, and Lincoln Acres.

2. The County's Land Use and Environment Group (LUEG) has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated area of the county. Project impacts that could have potentially significant adverse effects to the unincorporated area or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: <http://www.sandiegocounty.gov/pds/procguid.html>.

DEPARTMENT OF PARKS AND RECREATION (DPR)

1. Please coordinate with County DPR and DPR community stakeholders to incorporate safe multi-use crossings associated with County trail and/or park access such as crossings, bridges, or overpasses for recreational use for areas nearby existing or potential future trail connections/trailheads.
2. Please coordinate with County DPR and DPR community stakeholders to ensure wildlife connectivity is maintained from adjacent lands to preserved County lands, including wildlife-only crossings.
3. Please coordinate with County DPR and DPR community stakeholders to ensure regional trail connectivity and connections to County DPR facilities for Bayshore Bikeway, San Diego River Park Trail, Trans County Trail, the Coast to Crest Trail, Sweetwater River and Loop Trail, Otay Valley Regional Park Trail, California Coastal Trail, California Riding and Hiking Trail.
4. Please use the County Trails Master Plan as a planning and reference document, specifically for the Coast, Canyons, and Trails CMCP. For more information: [Community Trails Master Plan \(sandiegocounty.gov\)](#).
5. Please coordinate with DPR and DPR community stakeholders on any DPR managed facilities and associated land impacts, including stormwater runoff, transportation, road closures or delays, vegetation plans and public access.
6. Please coordinate with County DPR and DPR community stakeholders on impacts to Waterfront Park along Harbor Drive, San Elijo Lagoon Ecological Reserve along the COASTER and I-5 route, and any Public Transit impacts which access DPR managed facilities.

FIELD ENGINEERING

1. If any of the County maintained roads will be trench/cut within 3 years after the road is resurfaced, the full width of the roads will be required to be resurfaced with the same treatment in order to comply with the County's Cut Policy. Please coordinate with Lawrence Hirsch, Utility Coordinator, for any updates or questions at (858) 694-2215 or at lawrence.hirsch@sdcounty.ca.gov.

July 29, 2022

Page 3

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 Timothy Vertino, Land Use / Environmental Planner, at (619) 510-2542, or via e-mail at timothy.vertino@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
David Flores, Policy Advisor, Board of Supervisors, District 1
Gregory Kazmer, Land Use Director, Board of Supervisors, District 2
Michael Kulis, Policy Advisor, Board of Supervisors, District 2
Rebecca Smith, Policy Advisor, Board of Supervisors, District 3
Jeffrey Yuen, Policy Advisor, Board of Supervisors, District 3
Cody Petterson, Policy Advisor, Board of Supervisors, District 3
Emily Wier, Policy Advisor, Board of Supervisors, District 4
Joon Suh, Policy Advisor, Board of Supervisors, District 4
Hunter McDonald, Policy Advisor, Board of Supervisors, District 5
Luis Pallera, CAO Staff Officer, LUEG
Emmet Aquino, Park Project Manager, DPR
Sue Waters, Land Use/Environmental Planner, DPW



July 21, 2022

Dear Jennifer Williamson & Ramon Martinez,

We appreciate your efforts to facilitate opportunities for community engagement through the 2022 South Bay to Sorrento CMCP by extending the deadline for public comment. The City Heights Built Environment Team is a community group who wants to see a dignified, equitable, efficient and affordable transportation system in our region.

These are the top priorities our group has identified and would like to see implemented in the South Bay to Sorrento CMCP:

- Oppose freeway expansions that increase Vehicle Miles Traveled in City Heights and historically excluded, Environmental Justice communities; No additional lanes should be added to freeways unless they are transit only lanes
- Conduct an analysis of a project that converts a general purpose lane into a transit only lane or a managed lane by 2023; Conduct a demonstration of a project that converts a general purpose lane into a transit only lane or a managed lane by 2025
- Greater transit frequencies (7 min on peak, and 10 mins all day) in Transit Priority Areas; Collaborate with the Built Environment Team on a Pilot Program to identify and test high ridership routes in City Heights
- Late night and weekend service improvements with 24-hour service on major routes
- Supporting the Purple Line alignment through central City Heights
- Bikeways on major corridors with implementation of Early Action Projects in Mid-City by 2023
- Implementing traffic-calming measures including but not limited to: protected bike lanes, roundabouts, raised pedestrian crossings to improve to ensure a safer biking and walking experience
- Planting more trees throughout City Heights to foster a healthier urban environment
- Ensuring Youth Opportunity Passes for those aged 24 and under by 2023
- Improve [multimodal](#) beach access [for urban-core -communities](#)
- Route 625 from Southwest Chula Vista to City Heights to SDSU built by 2025
- Improve and exceed State of California standards for GHG reduction goals
- Maintain transparency with community members by sharing relevant data and progress updates surrounding project phasing, implementation, and funding
- Implement the 10 Transit Lifelines

We believe these priorities will help build a dignified, equitable, and affordable transportation system in our region.

Sincerely,

Jair Cortez
Brittany Gordon
Maria Cortez (City Heights CDC)
Jesse Ramirez (City Heights CDC)
Corinna Contreras (Climate Action Campaign)

Cynthia Nguyen
Bernadette Winter-Villaluz
Erik Winter-Villaluz
Vianney Ruvalcaba
Esperanza Gonzalez

Julio Garcia
Cyrene Gist
Haneen Mohamed (City Heights CDC)
Randy Torres Van- Vleck (City Heights CDC)
Edwin Lohr



CITY OF CORONADO

1825 STRAND WAY
CORONADO, CA 92118

OFFICE OF THE CITY MANAGER
(619) 522-7335
FAX (619) 522-7846

July 14, 2022

Subject: Comments on the South Bay to Sorrento Comprehensive Multimodal Corridor Plan

Dear SANDAG and Caltrans District 11 staff:

Thank you for the opportunity to review the Comprehensive Multimodal Corridor Plan (CMCP) to explore potential solutions to support climate initiatives, increase travel options, and address traffic congestion between the South Bay and Sorrento Valley - one of the most heavily traveled corridors in San Diego County. As previously expressed, the City of Coronado (City) continues to be concerned about the Orange Avenue Business District / village area being designated as a site for a future Mobility Hub without meaningful engagement with City residents and the City Council. Therefore, the City continues to request removing the hub from Coronado and as a recommended strategy in the CMCP.

The City has approximately 23,639 residents (ACS 2019) and a compact, fully developed village area covering about two square miles surrounded by the San Diego Bay and the Pacific Ocean. The CMCP Strategies are based on the Regional Plan. The Regional Plan designates the Coronado village area, including the Orange Avenue Business District as a mobility hub. In comment letters dated July 7, 2021, on the South Bay to Sorrento Comprehensive Multimodal Corridor Plan and on the San Diego Forward: 2021 Regional Plan dated, July 21, 2021, the City requested that a proposed mobility hub be removed from the City of Coronado.

The CMCP does not provide a clear picture of what is specifically envisioned for Coronado. There are no sites in the Business District where a mobility hub could be realistically located. The City includes a wide range of stakeholders and shares jurisdictional boundaries with the Navy, the Unified Port District of San Diego, the Coronado Unified School District, and the State of California Department of Parks and Recreation. Transportation corridors entering and exiting Naval Base Coronado and the Port District properties on State Routes 75 and 282 are Caltrans right-of-way and the City does not have control over military and Port District operations. Within this existing land use and environmental context, the City is highly constrained and does not have additional development capacity or any transitional zone or buffer to establish a mobility hub. It is difficult to imagine where micro-mobility related facilities could be physically sited given Coronado's existing built-out, compact and dense development pattern.

If a mobility hub is to be sited in Coronado, SANDAG should engage with the Naval Air Station North Island base since that is the City's biggest employer and primary source of traffic. On December 7, 2021, the City of Coronado City Council adopted a resolution opposing the

proposed mobility hub as identified in the SANDAG San Diego Forward 2021 Regional Plan (attached). Providing new or improved transportation options for personnel stationed at NASNI would offer the greatest potential to reduce automobile trips and resultant greenhouse gas emissions.

In Attachment 1, Section 3.3.1 titled “Strategy Refinement Approach and Outcomes by Priority Focus Area,” the language acknowledges the City of Coronado’s request for the mobility hub to be removed from consideration. Strategy Number 788, titled, “Coronado Mobility Hub AT Network,” is listed as a project phased for year 2035. The “Coronado Mobility Hub AT Network” strategy indicates that the proposed mobility hub has strong public support. This is incorrect. Staff is not aware of any notable support among Coronado residents and this statement should be revised accordingly.

The City has the following additional comments regarding the Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan dated June 2022:

1. CMCP Executive Summary – Page 9

“The overall cost of all 331 strategies recommended is \$59 billion, with approximately half the cost \$25M currently programed in the 2021 Regional Plan by 2035.”

- Comment- The referenced \$25M should be a “B” for billion.

2. Attachment 1, Recommended Transportation Solution Set, Strategy #53, Route 910

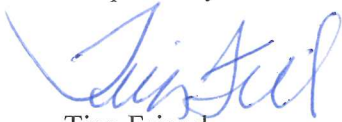
- Comment- Confirm that this route is in addition to the current MTS Route 901 and will not replace this route.

3. Attachment 2 – Planning Review and Corridor Performance Technical Memo

- Comment- Figure 4 (map). Forecasted Population Growth: This figure forecasts a population decrease where there is currently military housing at Silver Strand and Leyte Road. The shaded area along the Silver Strand also encompasses San Diego bay waters and the land area should be delineated apart from the bay waters to avoid confusion and misrepresentation of developable areas.
- Comment- Figure 6 (map). Forecasted Job Growth – The 2035 job growth forecasts increased jobs in a residential neighborhood area bounded by Ocean Boulevard, Coronado Avenue, 6th Street, and Alameda Boulevard where there is no employment center. Clarify or correct this discrepancy.
- Comment- Figure 11 (map). Social Equity Focus – Senior Population – Why does the Naval Amphibious Base indicate a high senior population?

- Comment, Section 4.2, Page 31 and Section 4.4.7, Page 75– Why does the document pair Coronado with Imperial Beach and the other San Diego bayfront Cities? These are different cities, with different settings and challenges. Provide a clearer distinction and description of City of Coronado and Naval Base Coronado jurisdiction, and Caltrans right-of-way. Why are Naval Base San Diego and portions of San Diego, National City, and Chula Vista bayfront areas discussed in the Coronado/Imperial Beach section? Coronado should be described in its own section separate from Imperial Beach and Naval Base San Diego.
 - Comment - Bifurcate Coronado and Imperial Beach including the other bayfront communities in the subarea analysis. The City of Coronado is a built-out city and housing growth will be nominal, not more than 2 to 3 percent (see Table 8, p. 100). The City of Coronado is not a disadvantaged community, and low-income populations in the City are lower than the 50% cited in the Table 9 (p.101). The senior population in Coronado should be projected to over 20 percent. Eight percent is not accurate and not representative of the local Coronado senior population (Table 10, p.102).
4. Section 5.1.3, Page 83 – “Industrial land uses primarily exist in Sorrento Valley, Kearny Mesa, Coronado/Imperial Beach, and the U.S.-Mexico Border.”
- Comment – There are no industrial uses in Coronado. Does this reference only include industrial uses in Imperial Beach and/or include military operations? Please clarify in the report.

Respectfully submitted,



Tina Friend
City Manager

Attachment - City Council Resolution, dated December 7, 2021

RESOLUTION NO. 2021-55

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CORONADO, CALIFORNIA, OPPOSING A PROPOSED MOBILITY HUB IN CORONADO AS IDENTIFIED IN THE SAN DIEGO ASSOCIATION OF GOVERNMENTS SAN DIEGO FORWARD: 2021 REGIONAL PLAN

WHEREAS, much of Coronado's village area is designated as a Mobility Hub in the San Diego Association of Governments (SANDAG) San Diego Forward: 2021 Regional Plan (Regional Plan); and

WHEREAS, Objective No. 1 of the Regional Plan calls to "(f)ocus population and employment growth in mobility hubs and existing urban areas to protect sensitive habitat and natural resource areas."; and

WHEREAS, Coronado village is a compact, fully developed area covering approximately two square miles surrounded by the San Diego Bay and Pacific Ocean, and is highly constrained with limited additional development capacity due to the multiple other jurisdictions that control land within Coronado; and

WHEREAS, there are no vacant or suitably sized underdeveloped properties within Coronado Village which could reasonably accommodate a multi-modal Mobility Hub; and

WHEREAS, SANDAG assigns jurisdictions with their Regional Housing Needs Allocation (RHNA), and most recently used the physical location of jobs and transit stops within a jurisdiction as the sole factors in assigning RHNA throughout the region; and

WHEREAS, the 1,800 percent increase in Coronado's RHNA during the most recent Housing Element cycle, from 50 units to 912 units, was a significant increase that has proven difficult to achieve, which would only be exacerbated by adding a new mobility hub if future RHNA is based on the availability of high-quality public transit and/or jobs; and

WHEREAS, Coronado is only served by two vehicular access points, the San Diego-Coronado Bay Bridge and the Silver Strand (SR-75), which is designated as a Strategic Highway Corridor Network (SRAHNET) connector that is for national defense purposes; and

WHEREAS, the Coronado village area is not a significant jobs center for the region; and

WHEREAS, the largest employment center within Coronado is Naval Air Station North Island (NASNI) which generates the greatest volume of vehicle miles travelled in the City; and over which the City of Coronado does not exercise land use authority; and

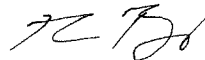
WHEREAS, the provision of new and/or enhanced transportation options for civilian and active duty military personnel stationed at NASNI would offer the greatest potential to reduce automobile trips and resultant greenhouse gas emissions; and

WHEREAS, the Coronado City Council believes that shifting the responsibility for providing expanded housing and transportation options from the United States Federal Government to local cities is unfair, unjust, and ineffective;

NOW THEREFORE BE IT RESOLVED by the City Council of the City of Coronado, California, that it hereby opposes the SANDAG San Diego Forward: 2021 Regional Plan so long as a Mobility Hub is identified in the Coronado Village area.

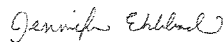
PASSED, ADOPTED, AND APPROVED by the City Council of the City of Coronado, California, at a regular meeting thereof this 7th Day of December 2021 by the following vote to wit:

AYES: DONOVAN, HEINZE, SANDKE, TANAKA, BAILEY
NAYS: NONE
ABSTAIN: NONE
ABSENT: NONE



RICHARD BAILEY, Mayor of the
City of Coronado, California

ATTEST:



JENNIFER EKBLAD, City Clerk of the
City of Coronado, California



July 29, 2022

SANDAG Board of Directors
401 B Street
San Diego, CA 92101

RE: Comments to the Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan

Chair Blakespear and Board Members,

Environmental Health Coalition (EHC) appreciates SANDAG's effort to meaningfully engage stakeholders through the 2022 Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan (Draft CMCP) including the public comment extension, inclusion of simultaneous professional interpretation during meetings and numerous engagement opportunities. We commend SANDAG for amending the alignment of Route 582 (The Purple Line) to service central City Heights, the recognition to prioritize mass transit, and intention to prioritize environmental Justice communities (EJ). EHC supports the recommendations provided by the San Diego Transportation Equity Working Group (SDTEWG) to the Draft CMCP and expands its comments to include priorities identified by portside communities and requests the following:

- 1. A significant expansion of the Goods Movement section to account for the impacts of warehouses and heavy-duty trucks sitting and circulating within residential neighborhoods; address parking issues in Barrio Logan; and ensure charging stations are located away from impacted communities.**

The Draft CMCP should recommend the adoption of an Indirect Source Rule by the Air Pollution Control District (APCD) to improve warehouse-sitting criteria. The criteria should include an analysis of impacts to the community and include facility regulation based on the pollution generated by the trucks that service the warehouses.

Simultaneously, the Plan should incorporate truck route enforcement neighboring the Tenth Avenue Marine Terminal (TAMT) and National City Marine Terminal (NCMT). The City of San Diego adopted a truck route to protect residential streets, however the routes are not enforced and continuously violated. As the plan looks to improve goods movement integration in the transportation system, it is essential to protect community health and ensure truck route enforcement.

Address parking issues in Barrio Logan resulting from the shipyards & Navy by institutionalizing temporary solutions. For example, BAE Systems instituted an interim solution by renting parking space at the Hilton Hotel and then shuttling



employees. The Draft CMCP should plan to integrate a wider micro transit network that connects workers to transit stations, provides incentives to use the system and reduces parking demand.

Finally, EHC supports the inclusion of charging stations in major corridors but wants to ensure their location to ensure they are located away from already impacted communities.

2. Ensure new housing is built at least 500 feet from the freeway.

New housing should be built at least 500 feet away from the freeway. Currently, the Draft CMCP does not address land use incompatibility between freeways and residential uses. The Plan should look to the guidance provided by the California Air Resources Board to provide 500 feet from the freeway especially in areas highly impacted by goods movement.

Thank you for the opportunity to provide comments to the Draft CMCP. We look forward to continue to collaborate with SANDAG to advance best solutions for our communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Carolina", is written over a light blue rectangular background.

Carolina Martinez
Climate Justice Campaign Director



July 29th, 2022

Jennifer Williams
SANDAG
401 B Street, Suite 800,
San Diego, CA 92101,
Attn: SB2S CMCP

In response to the release of a document labeled "Recommended Transportation Solution Set" in the South Bay to Sorrento Comprehensive Multimodal Corridor Plan, we wish to express our recommendations and some concerns.

First, we appreciate the opportunity to comment on the plan and that your task at SANDAG of creating a massive list of projects is not at all straightforward.

This list was described in a June 30th meeting as projects that are not necessarily recommended by SANDAG planners, but rather it included projects suggested by stakeholders and the community. This creates a degree of confusion as it is a SANDAG document implying through its title that they are recommended. One useful point of clarity may be to describe in all public documents like this, who has recommended them, and to what degree they have been vetted to be legal, viable, or consistent with SANDAG's stated goals. This is important for all who are assessing the projects to understand why they have been included. We appreciate additional information that was provided to us on request, but this should be in the original document for future CMCP documents.

Because a very large number of projects were not part of the RTP, it may be best not to label this large non-prioritized list of possible projects, "Recommended." It might be more accurate to call it a superset of proposed projects from many regional stakeholders. We appreciate that many other projects that were proposed were not included.

It is very difficult to assess individual projects because there is no additional information for the listed projects, beyond a sentence or three. So instead we will speak in general terms about the category of projects that we believe should be prioritized and those that should not.

One concern that stood out involves the ports. The Harbor 2.0 project (limited access highway) is an example of a project in conflict with the needs of the community and with the Bayshore Bikeway, currently in construction there. Communities in the South Bay already suffer the worst air quality affecting peoples' health adversely. There are projects listed, intended to improve the flow of freight, ostensibly to ease the flow of diesel trucks traveling from and to the port; however, any gains in easing congestion in trucking will likely lead to additional new truck traffic resulting in the same or more emissions. Port cities and industries relying on our sea ports, need to increase use of freight rail, not new limited access highways that will increase the number of trucks that will serve the port in the future. Inland warehousing coupled with added port vehicle traffic is not a model we should reinforce by streamlining new highway configurations or giving freight trucks highway priority with managed lanes. Electric rail is much more viable as the sustainable, efficient, extremely low carbon emissions solution for freight than even battery electric semi trucks, but there are no new rail freight lines proposed to better serve the ports by 2050.

There are many transit related projects, and we encourage SANDAG to accelerate those plans. Introducing BRT on existing roadspaces should not have to be characterized as "2035", as indicated in the plan, and more clear timelines for these new routes/lines should be indicated. Adding new lanes to highways to include additional BRT lanes (on shoulders for example) does not discourage car driving with the same impact that using an existing lane as the new BRT lane would. Prioritizing transit means prioritizing existing lanes. Managed lanes (via HOT pricing or 2 person HOV) are not a proven strategy to reduce single occupancy vehicles, and we feel too much reliance is placed on them.

Our primary mandate should no longer be reduction of congestion, and in theory it is not. But this CMCP still has emphasis on congestion reduction and not enough planning for how to bring about a major mode shift away from single occupancy vehicle use, and the accompanying reduction in emissions that comes with it. SANDAG projects that are planned this far into the future, should be informed by the newest strategies from the state including those in the CalSTA's Climate Action Plan for Transportation Infrastructure (CAPTI) whose 10 guiding principles include:

- Building toward an integrated, statewide rail and transit network
- Investing in networks of safe and accessible bicycle and pedestrian infrastructure
- Advancing investments in light-, medium- and heavy-duty zero-emission vehicle infrastructure
- Strengthening the commitment to social and racial equity by reducing public health and economic harms and maximizing community benefits
- Making safety improvements to reduce fatalities and severe injuries of all users toward zero
- Assessing physical climate risk for transportation infrastructure projects
- Promoting projects that do not substantially increase passenger vehicle travel
- Promoting compact infill development while protecting residents and businesses from displacement
- Developing a zero-emission freight transportation system
- Protecting natural and working lands

Rail projects are currently considered by planners to be too expensive and have too long of timelines. But rail transit is superior in emissions reduction, rider experience, operating costs, and ultimately in sustainability. Dragging our feet on rail expansion, with the hope that battery electric cars are the interim or majority solution, will be a self fulfilling, but failed, prophecy. Therefore the rail projects should receive priority. San Diego led on light rail, and a shift to rely heavily on BRT is a step backwards. Rail dominates in high wage environments, because bus operation is too costly to become a predominant mode of transportation. SANDAG must embrace the planning laid out in CAPTI to adapt to the big shifts that must happen. We must drop the false solutions of highway expansion or making cars flow more smoothly. Instead, mode shift planning is critical. Please do not fail to meet the moment with outdated targets of mild congestion reduction coupled with marginal transit increases.

We encourage prioritizing Active Transportation projects to create the right environment for mode shift away from single occupancy vehicles in all areas of the SANDAG region. It takes time to attract mode shift but that starts with making walking, biking, and micromobility safe for all ages and abilities. San Diego surely has latent demand for Active Transportation that will meet the challenges of Climate Crisis as soon as we make it safe to do so.

In closing, it is important to reinforce that as we have done in the past, we will vigorously oppose any projects that threaten to affect protected lands or natural habitats, as these spaces rely on us to be caretakers for them. We look forward to working with SANDAG to try to elevate the needed, substantial changes to transportation that have thus far been missing or delayed in our planning. We appreciate SANDAG staff's challenges with trying to meet all stakeholders' needs.

David Grubb
Transportation Chair
Sierra Club San Diego

Deborah Knight
Executive Director
Friends of Rose Canyon

Will Rhatigan
Advocacy Director
San Diego County Bicycle Coalition

Phil Birkhahn
Transportation Committee
San Diego 350

Corrina Contreras
Transportation Policy Advocate
Climate Action Campaign



July 29, 2022

SANDAG Board of Directors
401 B Street
San Diego, CA 92101

RE: Environmental Justice Comments to the Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan

Chair Blakespear and Board Members,

We appreciate your efforts to facilitate opportunities for community engagement through the 2022 Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan (Draft CMCP) by extending the deadline for public comment. The San Diego Transportation Equity Working Group (SDTEWG) was established in 2018 by community-based organizations in an effort to elevate transportation and environmental justice opportunities in Mid-City and South Bay. We look forward to the transportation infrastructure improvements that the Draft CMCP will bring to environmental justice (EJ) communities, including Route 582 (The Purple Line). As per the [10 Transit Lifelines](#), it is critical that all regional planning prioritize the wellbeing of environmental justice communities. The SDTEWG core organizations appreciate the opportunity to provide feedback to the Draft CMCP and would like to offer the following recommendations on how to best reflect inclusion of environmental justice priorities:

- A. A plan amendment to guarantee that the SR-15 to I-805 managed lane connector project be dedicated transit only lanes.**
- B. Add affordable housing to the performance measures listed in the Planning Approach.**
- C. Analyze and pilot a general purpose lane conversion to transit only lane bordering an EJ community (top 25% community by CalEnviroScreen). The analysis should be conducted by 2023 with a 2025 pilot implementation.**

SDTEWG supports the revised alignment of Route 582 (Purple Line) - Sorrento Mesa to National City via City Heights,¹ which reflects community priorities by going through central City Heights. We also commend SANDAG for prioritizing a shift towards mass transit and a focus on providing service to disadvantaged communities (referred to as “historically disinvested communities” in the plan).² The mode shift towards transit is consistent with priorities identified during the stakeholder group-meeting poll,³ which ranked the top three concerns in the following order:

1. Connecting affordable housing and jobs (efficient land use)

¹ SANDAG. Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan. June 2022. P45.

² SANDAG, P9.

³ SANDAG, P40.



2. Transit availability and other transportation choices
3. Traffic congestion and travel reliability

We agree with the sentiment of the Draft CMCP that the climate crisis requires our region to take urgent and unprecedented steps to significantly move more San Diegans on transit and connect them to affordable housing and jobs.

However, the project list included in *Attachment 1: Recommended Transportation Solution Set*, is of concern as it is not consistent with those priorities. It continues to overspend on managed lanes and underspend on transit priorities. Based on the project list; **SANDAG anticipates spending at least about \$6.4 billion solely on managed lanes despite the urgency to improve mass public transit.** While SDTEWG supports general purpose lane conversion to Managed Lanes (and request a demonstration project to learn more), we are concerned that Managed Lanes in the Draft CMCP may be environmentally unsound as it continues to prioritize potential vehicle miles travel (VMT)-increasing projects.

- A. **SDTEWG requests a plan amendment to guarantee that the SR15 to I-805 managed lane connector project be dedicated transit only lanes. We also request that the SR-15 Centerline transit only lanes extend from City Heights to the SR-94 and that they connect to the SR-94 with transit only connector lanes.**

In June 2022, the California Air Resources Board (CARB) published the *California's Sustainable Communities and Climate Protection Act Draft Progress Report*.⁴ The report accurately states the problem: **"Californians are driving more – leading to more pollution, higher costs, and worse day-to-day experiences...The core problem is that even well-made plans too often remain as plans, rather than becoming realities."**⁵ As a result, California is not on track to meet its GHG reduction goals.

In particular, the report expresses strong reservations about managed lane projects. According to CARB,

"Meeting the GHG emission reductions needed from SB 375 relies on funding VMT-reducing projects. This can be accelerated by a structural realignment of the State's framework for planning and funding transportation to further prioritize investments in passenger rail, transit, active transportation, and building more sustainable communities. Billions in funding for VMT-increasing projects are still found within RTPs (e.g., new general-purpose lanes, new managed lanes, interchanges, and new arterials and connector roads) as many transportation projects in the pipeline reflect priorities from earlier years and do not consider California's current goals and priorities for VMT reduction. Re-envisioning projects can be an opportunity to meet core needs in ways that align with State climate goals and do not increase VMT."⁶

⁴ As required by Senate Bill 150, the report assesses progress in the implementation of Senate Bill 375, which requires Metropolitan Planning Organizations to plan for GHG emissions and VMT reductions in their respective Regional Plans.

⁵ California Air Resources Board. 2022 Progress Report California's Sustainable Communities and Climate Protection Act. June 2022. P4.

⁶ CARB, P47.



The SDTEWG opposes freeway expansions and projects that increase VMT particularly in EJ communities. MPOs like SANDAG are challenged by previously approved transportation projects like the SR15 to I-805 managed lane connector project and are planning to commit billions in funding for new managed lanes, which will increase VMT. In addition, this particular project's ten year old environmental impact report (EIR) might have outdated VMT and GHG reduction data. **SDTEWG calls on SANDAG to amend the SR15 to I-805 managed lane connector project to guarantee that all conversions of general purpose lanes be for managed lanes or transit lanes and that any new, additional lanes be dedicated to transit only lanes.**

B. Affordable housing (also identified as a priority by the stakeholder group-meeting poll)⁷ is a key to efficient land use and should be added to the performance measures listed in the Planning Approach.

Corporate real estate firms and counterproductive housing policies are displacing residents in EJ communities from the neighborhoods they worked hard to transform into healthy communities. Barrio Logan, Sherman Heights, City Heights, and National City are neighborhoods hit first and worst by climate change. They are also communities where residents must sometimes choose between paying rent and purchasing food. On average, more than 1/3 of their income is spent on rent. The San Diego County 2021 Affordable housing Needs Report found that “81% of extremely low-income households are paying more than half of their income on housing costs.”⁸ The aforementioned SB150 Progress Report stated that “despite an increase in planning for homes at all income levels, efforts to build homes are not meeting the need, particularly for homes for lower-income households.”⁹ Since low-income residents are also more likely to be transit riders, connecting these two factors is important for mobility and access. Mechanisms to identify best transportation projects should prioritize affordable housing to promote efficient land use.

The SDTEWG is grateful for the opportunity to provide comments to the Draft CMCP and looks forward to continue to collaborate with SANDAG to advance best solutions for our communities.

Sincerely,

The San Diego Transportation Equity Working Group (SDTEWG)

Center on Policy Initiatives Keara O’Laughlin

City Heights Community Development Corporation, Randy Torres-Van Vleck, Jesse Ramirez and Haneen Mohamed

Environmental Health Coalition, Carolina Martinez & Nancy Cruz

Mid-City CAN, Diana Ross

SanDiego350, Toshihiko Ishihara & Steven Gelb

⁷ SANDAG, P40.

⁸ California Housing Partnership. San Diego County 2021 Affordable Housing Needs Report. May 2021 https://p08d91kd0c03rlxhmhtydr-wpengine.netdna-ssl.com/wp-content/uploads/2021/05/San-Diego_Housing_Report_2021-HNR.pdf. P1.

⁹ CARB, P7.

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HEATHER M. MINNER
Attorney
Minner@smwlaw.com

July 29, 2022

Via U.S. Post and Electronic Mail

San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101
Attn: SB2S CMCP
E-Mail: cmcp@sandag.org

Re: Comments on Draft South Bay to Sorrento Comprehensive Multimodal Corridor Plan (Draft SB2S CMCP)

Dear SANDAG:

This firm represents Friends of Rose Canyon in matters related to the review and adoption of the SANDAG/Caltrans South Bay to Sorrento Comprehensive Multimodal Corridor Plan (SB2S CMCP).

Friends of Rose Canyon is a community-based organization dedicated to the protection, preservation and restoration of Rose Canyon and the Rose Creek watershed. It has an active Board of Directors and dedicated base of supporters. Friends of Rose Canyon is regularly involved in community planning efforts throughout the San Diego region, and it's Executive Director, Deborah Knight, participated extensively in the public review process for SANDAG's 2021 Regional Plan.

Friends of Rose Canyon continues to have concerns regarding the projects identified in Attachment 1 (Recommended Transportation Solution Set) of the draft CMCP. Detailed comments by Friends of Rose Canyon are attached to this letter. We are writing separately to emphasize two main issues below.

SANDAG has confirmed to FRC in writing that the description “Construct direct access ramps (DAR) to I-805” will be removed from the CMCP and a project similar to what is in the Regional Plan (“Transit Operational Improvement”) will be added. Additionally, the SB2S CMCP must remove projects # 8 (UCSD to Sorrento Valley Skyway), and # 1263 (extension of mid-coast trolley to connect to

LOSSAN). These are major new projects that have not yet undergone *any* environmental review and are not evaluated in SANDAG's 2021 Regional Plan.

CMCP project No. 8 (UCSD to Sorrento Valley Skyway) and No. 1263 (extension of mid-coast trolley to connect to LOSSAN) are major new projects that would have significant environmental impacts as discussed in Friends of Rose Canyon's comments. CMCP project No. 8 was strongly opposed by Friends of Rose Canyon during the Regional Plan planning process, and the project was rejected for inclusion in the 2021 Regional Plan. CMCP project No. 1263 was not only *not* in the 2021 Regional Plan, it conflicts with the UTC Tunnel Project, which is in both the SB2S CMCP and the 2021 Regional Plan. Neither Project No. 8 or Project No. 1263 have undergone environmental review and should not be listed for the first time in the CMCP. The final draft CMCP must remove reference to these projects.

As SANDAG notes on its website, CMCPs are the "implementation blueprints that take the transportation vision of the 2021 Regional Plan and explore the programs and projects that can be developed to make it a reality." Projects in the CMCP should thus be drawn directly from the 2021 Regional Plan, which included an elaborate Public Involvement Plan. The 2021 Regional Plan was subject to a programmatic review of environmental impacts under the California Environmental Quality Act (CEQA), a review that included the proposed projects as well as cumulative impacts and an analysis of alternatives. SANDAG should not be circumventing this comprehensive review of projects by identifying major new projects with significant concerns in the CMCP less than a year later.

In particular, highway projects for the I-805/SR-52 and nearby highway segments will have major individual and cumulative impacts on habitat, habitat linkages and wildlife movement corridors between Rose Canyon, MCAS Miramar and Marian Bear Park (San Clemente Canyon). Impacting this same intersection and nearby highway segments is RTP Project CC065 (creating 3 additional lanes on SR-52 between I-805 and I-5). This project is wrongly carved out of the SB2S CMCP and presumably included only in the Coast, Canyons and Trails CMCP, even though the two CMCPs significantly overlap in this area. Cumulative impacts from multiple projects in multiple CMCPs will need to be fully examined.

Because the projects identified in the 2021 Regional Plan have already undergone program-level environmental review, they could be closer to shovel-ready than these new CMCP projects that were not included in the 2021 Regional Plan. SANDAG should focus its resources on implementing the projects it has already invested in through adoption of the Regional Plan, rather than take up major new projects that will require additional steps for CEQA compliance and that could face strong opposition.

Compounding this problem, the Draft CMCP incorrectly states that several projects received “no response” from the public, when in fact Friends of Rose Canyon and/or the Sierra Club strongly opposed these projects in comments on the draft Regional Transportation Plan (RTP). Friends of Rose Canyon and others strongly opposed the Sorrento Mesa to UCSD Skyway project. Friends of Rose Canyon and others also strongly opposed the Nobel/I-805 Direct Access Ramps, which SANDAG has said were included by error in the Draft SB2S CMCP and will be deleted.

Similarly, while the California High Speed Rail Authority eliminated the route through Rose Canyon due in part to major public opposition and significant environmental impacts, the draft CMCP now proposes an extension of the mid-coast trolley to connect to LOSSAN with two stations in the Rose Canyon riparian corridor. This project would also conflict with the UTC Tunnel project, which has support from many environmental groups, including FRC. There is no reason to proceed with the inclusion of projects with resource impacts when there are many other projects that are worthy of funding in areas that will bring more value and fewer subsequent environmental challenges.

Projects that are not included in SANDAG’s Regional Plan are not even eligible for funding from the Congested Corridors Program created by Senate Bill 1 (SB 1). One of the primary purposes of the CMCP is to facilitate efforts to pursue funding from SB 1, which requires projects to be a part of a comprehensive corridor plan to be eligible for the \$2.5 billion in grant dollars that will be available through the new Congested Corridors Program. Specifically, SB 1 states that “In addition to being included in a corridor plan, a nominated project shall *also be included in the region’s regional transportation plan.*” Streets & Highways Code § 2393 (emphasis added). Including these major new projects in the CMCP that were not a part of the comprehensive analysis that SANDAG just completed in adopting the 2021 Regional Transportation Plan thus undermines the legislative intent for these SB 1 funds.

Other projects in the Draft CMCP should also be removed and others should be modified to avoid significant impacts to critical habitat, sensitive species, Federal/State/local protected lands, and open space linkages.

Other projects must also be removed from the draft CMCP due to their significant environmental impacts as detailed in Friends of Rose Canyon’s attached comments. Specifically, Project No. 1292 (Coastal Rail Trail San Diego), remove the portion of the Roselle Canyon project east of the intersection with the I-5 bikeway. For Project No. 146, remove two components that are infeasible: a new trail connection from Nobel Drive along I-805 to Copley Drive and the Genesee Avenue trail through San Clemente Park along CA-52 to Ruffin Road.

San Diego Association of Governments (SANDAG)

July 29, 2022

Page 4

SANDAG should be mindful of significant environmental impacts as it continues to design other projects in the draft CMCP and Regional Plan. In particular, project number 3, Route 582 (the Purple Line), must be undergrounded where it crosses both the Rose Creek Watershed and the Sorrento Valley/Carroll Canyon Creek/Sorrento Mesa area. SANDAG should modify the description of these projects now in the CMCP, so that complex environmental issues can be avoided early on. This will allow SANDAG to move forward with projects that are more likely to be successfully completed.

* * * *

Friends of Rose Canyon appreciates SANDAG's commitment to identifying transportation programs and necessary funding sources to improve mobility for all residents of the region. We also expect that SANDAG will improve efforts to safeguard the habitat and natural resources of the greater San Diego region when planning for these mobility enhancements. The CMCP and Regional Plan combined contain multiple significant highway projects proposed for the I-805/SR-52 interchange and surrounding areas. These projects individually and collectively will have significant environmental impacts on Rose Canyon, Marian Bear Park, and MCAS Miramar environmentally sensitive lands, Multi-Habitat Planning Area (MHPA) lands, wildlife movement corridors within and between these areas, and on the Rose Creek watershed. SANDAG and Caltrans must coordinate planning for and environmental review of these multiple significant projects rather than piecemealing them. This should occur in an open and transparent public process that allows for meaningful stakeholder input.

Friends of Rose Canyon looks forward to seeing changes made in the final version of the SB2S CMCP in line with comments raised here and in the attached letter.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Heather M. Minner

cc: Deborah Knight, Executive Director, Friends of Rose Canyon

Attachment: Comment letter from Friends of Rose Canyon, dated July 29, 2022

1537361.1

SHUTE, MIHALY
& WEINBERGER LLP



Friends of Rose Canyon
PO Box 221051, San Diego, CA 92192-1051
858-597-0220 * rosecanyon@san.rr.com
www.rosecanyon.org

July 29, 2022

Via U.S. Post and Electronic Mail

San Diego Association of Governments (SANDAG)
401 B Street, Suite 800
San Diego, CA 92101
Attn: SB2S CMCP
Email: cmcp@sandag.org

Re: Comments on Draft South Bay to Sorrento
Comprehensive Multimodal Corridor Plan (Draft SB2S CMCP)

Dear SANDAG,

Friends of Rose Canyon (FRC) submits the following comments on the Draft SB2S CMCP.

I. The Draft SB2S CMCP claims there was no public response (“NR”) to projects that FRC strongly opposed in our comments on the draft Regional Plan submitted to SANDAG on August 6 and Oct. 11, 2021 (comments attached). The Sierra Club also submitted Regional Plan comments opposing some of the same projects. SANDAG was preparing the CMCP before, during and after the comment period on the Regional Plan and approval of it. The CMCP needs to reflect and consider public opposition to those projects.

In a process that is massively confusing to the public and decision makers, the Draft CMCP uses an entirely different naming system from the Regional Plan for the same projects. For example, in FRC’s comments on the Draft RP, we raised strong objections to “Project ID CC085” (Managed Lane Connectors at I-805/SR-52). In the Draft CMCP, this same project is called “Strategy 575” and is shown as having had “No Response” (NR) from the public.

Other projects that FRC opposed in the Regional Plan that are now listed in the CMCP as having “No response” (NR) from the public:

CMCP 1273 - SR-52 Managed Lanes from I-805 to SR-125 (CC086 in the 2021RP)

CMCP 575 - ML Connectors at I-805/SR-52 west to north and south to east (CC085 in the 2021RP)
and north to west and east to south (CC028 in the 2021RP)

FRC also strongly opposed Project CC065 in the 2021RP that will impact the same area as CMCP 1273 and CMCP 575, yet our opposition fails to be listed in the SB2S plan:

**Re: Project CC065: ML SR 52 (I-5 - I-805) 4F to 4F + 3 ML, adding three new lanes to SR 52
The Draft SB2S CMCP fails to even list this project, even though a substantial portion of it lies within the SB2S corridor.**

The conversion of this stretch of SR-52 from 4 to 7 lanes cannot be arbitrarily left out of the SB2S CMCP because a portion of it extends outside the narrow confines of the SB2S corridor. This project will be part of the huge cumulative environmental impacts on Marian Bear Park, Rose Canyon, and MCAS Miramar and Rose Creek watershed environmentally sensitive lands and the wildlife movement corridors between them.

Project CC065 also violates the claims SANDAG makes repeatedly that it is “only repurposing existing lanes” and “not adding capacity” to highways. This project would convert SR-52 between I-5 and I-805 from 4 General Purpose Lanes to 4 General Purpose Lanes + 3 Managed Lanes. It would thus add three lanes of capacity, part of the 406 new lane miles of freeway and state highway included in the 2021 Regional Plan.

SANDAG refused to delete this project from the Regional Plan despite our repeated requests and thousands of signatures on a petition. Its environmental impacts on Marian Bear Park and the Rose Creek watershed carried no weight - nor did the pleas of the thousands of urban residents who find an escape to nature there.

CMCP: 578 - Nobel/I-805 DARs. The DARs at this location are not in the 2021RP. SANDAG has confirmed to us in writing that they will be deleted as they were included in the Draft CMCP by accident.

II. SANDAG’s CMCP process gives no hint to decision makers or the public of the potential for enormous individual and cumulative environmental impacts on the Rose Canyon/Marian Bear Park/MCAS Miramar natural areas and Rose Creek watershed. It obscures the impacts further by carving this area up into a narrow north-south SB2S strip and a narrow east-west Coast, Canyons and Trails strip.

The 2021 Regional Plan, the Regional Plan EIR, and the SB2S CMCP all fail to identify the existence of the connected environmental resources in Rose Canyon, Marian Bear Park and MCAS Miramar, and the Rose Creek watershed.

Marian Bear and Rose Canyon are largely MSCP lands with riparian and upland habitat. They also contain the following last remaining, although highly constricted, wildlife movement corridors:

- the length of Rose Canyon and Marian Bear Park (San Clemente Canyon)
- between Rose Canyon and MCAS Miramar under the I-805 bridge
- between Marian Bear Park and MCAS Miramar under the SR-52/I-805 intersection
- between Marian Bear Park and Rose Canyon under SR-52 near the I-5 intersection

The SB2S CMCP cannot simply ignore the cumulative environmental impacts that the multiple huge projects proposed for the I-805/SR-52 intersection will have on the habitat and wildlife corridors surrounding that intersection. Nor can the CMCP ignore the cumulative environmental impacts of these projects combined with the 2021RP highway projects that are in the Coast, Canyons and Trails CMCP: three additional lanes on SR-52 between I-805 and I-5, the multiple Managed Lane connectors at SR-52/I-5, and additional lanes on I-5 north and south of the SR-52 intersection.

III. The Draft CMCP proposes a large number of projects for certain specific areas, but those projects are never shown aggregated on a map. The 339 separate maps of individual projects fail to convey the totality of what is being proposed.

The Draft SB2S CMCP makes it impossible for the public and decision makers to have any idea which of the 339 projects are proposed for the same general area, what the magnitude of those combined projects is, how those projects might conflict or be prioritized or timed, and what the magnitude of the individual and cumulative environmental impacts might be. Two of these areas at the north end of the Draft SB2S CMCP where multiple major rail, highway and road projects are clustered are: **the Sorrento Valley area and the Rose Canyon/Marian Bear Park/MCAS Miramar area.**

The SB2S CMCP must contain maps of areas where projects are clustered.

The SB2S CMCP should contain a map for each area in the corridor where there are a large number of projects proposed. The map should show existing infrastructure (roads, rail lines, buildings, etc.) and should identify the approximate location and the name of each project proposed in any CMCP and in the Regional Plan for that area. The map should be topographic and indicate MSCP and other environmentally sensitive lands in order to convey the potential construction challenges and environmental impacts (steep slopes, riparian corridors, watersheds, wetlands, MHPA lands, wildlife movement corridors, etc.).

Maps for clustered projects at the northern end of the SB2S CMCP should include:

- 1. Sorrento Valley area** from the Sorrento Mesa and Carroll Canyon areas to Los Penasquitos Creek and Lagoon, including the steep north-facing and east-facing undeveloped slopes throughout the area, Carroll Creek, wildlife movement corridors, MSCP lands, and existing rail, highways and roads.
- 2. The Rose Canyon, Marian Bear Park, MCAS Miramar area** around the I-805/SR-52 intersection, extending north along I-805 to Carroll Canyon Road, east along SR-52 at least ½ mile, west along SR-52 to I-5 (including the planned 3 new lanes on I-805 and the ML Connectors at SR-52/I-5).

The Sorrento Valley Area Map should indicate the following CMCP and RP proposed projects:

- 61 - Coaster: UTC Tunnel
 - 62 - Coaster: Sorrento Mesa Tunnel
 - 3 - Route 582 (Purple Line) - Sorrento Mesa to National City via City Heights
 - 8 - UCSD to Sorrento Valley Skyway
 - 586 - Managed Lane Connectors at I-5/I-805 (North) - Directly connect managed lanes for I-5 and I-805 (north to north and south to south)
 - 338 - LOSSAN Sorrento Valley Blvd Grade Separation: Grade separations along the LOSSAN corridor
 - 396 - LOSSAN Sorrento Valley Blvd Safety Improvements
 - 397 - LOSSAN Sorrento Valley Crossover
 - 1333 - I-805 BRT North Service (BRT service from Kearny Mesa to Sorrento Valley)
 - 618 - Sorrento Valley Mobility Hub
 - 384 - Sorrento Valley Enhanced Service Areas within SB2S Study Corridor (enhanced service area around the planned passenger rail station and the existing Sorrento Valley Coaster station)
 - 998 - Sorrento Valley Mobility Hub AT Network - Active transportation options such as bicycle and pedestrian facilities. Complete missing pedestrian and bicycle linkages
 - 132 - Carmel Valley - Sorrento Valley Connection - North-South regional bike connection: 1. Sorrento Valley Rd 2. Vista Sorrento Pkwy
 - 1300 - Coastal Rail Trail San Diego - Carmel Valley to Roselle via Sorrento
 - 419 - University Community - Sorrento Valley Connection
 - 672 - I-805 BRT Transit Only Lane
 - 582 - Congestion Pricing at I-805 DAR at Carroll Canyon Rd
- Regional Plan: Sorrento to Miramar Phase II project

The Rose Canyon/Marian Bear Park/MCAS Miramar Natural Lands Area Map should indicate the following CMCP and RP proposed projects:

- 575 - Managed Lane Connectors at I-805/SR-52 (west to north, south to east, north to west, and east to south) (all projects we opposed in our comments on the Draft Regional Plan)
- 1273 - SR-52 Managed Lanes from I-805 to SR-125
- 5 - I-805 BRT - BRT service from Otay West (Iris Transit Center) to Sorrento Valley. Add two BRT lanes on paved shoulders between Market Street and State Route 52
- 48 - Rapid Route 870 - SB2S Segment: Add route on (sic) UTC via Santee, SR-52 & I-15
- 146 - University Community - Kearny Mesa Connection: North-South regional bike connection:
 1. New trail connection from Nobel Dr. along I-805 to Copley Dr.
 2. Genesee Ave to trail through San Clemente Park along CA-52 to Ruffin Road
 3. Genesee Ave to Clairemont Mesa Blvd.
- 672 - I-805 BRT Transit Only Lane (or lanes? - says both)
- 82 - I-805 Managed Lanes from Balboa Avenue to NB By pass Lane (I-5)
- 83 - I-805 Dynamically Managed Lanes for Trucks Balboa Ave to I-5
- 578 - I-805 Interchange and Transit Operational Improvements at Nobel Dr.
- 671 - Rapid Route 870 - SB2S Segment: Add transit queue jump lanes along the route from I-805 & Nobel Dr. to UTC
- 651 - Rapid Route 870 - Transit Signal Priority - Add transit signal priority along the route from I-805 & Nobel Dr. to UTC
- 61 - Coaster: UTC Tunnel
- RP - Project CC065 (3 additional lanes on SR-52 between I-805 and I-5)
- RP - Project Managed lane connectors at SR-52/I-5

IV. Comments on and changes to Attachment 2

The Draft SB2S CMCP failed to review and incorporate information from important planning documents that contain crucial environmental information. These include: the MSCP, City of San Diego MHPA and Vernal Pool Habitat Conservation Plan, MCAS Miramar Integrated Natural Resources Management Plan, and Los Penasquitos Lagoon Restoration plans.

SB2S CMCP Attachment 2, p. 8 states:

“Planning documents and data were provided by SANDAG and Caltrans to help identify key planning considerations for the SB2S CMCP.”

The Planning Review failed to include the following documents critical to evaluating potential projects:

City of San Diego MSCP related documents: [Biodiverse SD](#) includes

- MHPA Interactive Map, MSCP Program
 - Vernal Pool Habitat Conservation Plan Interactive Map and Conservation Plan
 - Open Space Parks
 - Development Regulations for Environmentally Sensitive Lands Regulations,
 - Biology Guidelines
- [MCAS Miramar Integrated Natural Resources Management Plan](#) (INRMP, 2017)
Of particular importance is Chapter 4, Biological Resources - Section 4.5 Habitat linkages and Wildlife Corridors. This section includes:

4. Wildlife and Wildlife Habitat (starting on p. 4-16)

Figure 4.5a - Conceptual Wildlife Corridors on Western MCAS Miramar. Shows the wildlife corridors connecting MCAS Miramar with Rose Canyon, Marian Bear Memorial Park, Soledad Canyon, Penasquitos Lagoon and Torrey Pines State Preserve.

Figure 4.5b - Conceptual Wildlife corridors on Eastern MCAS Miramar showing San Clemente Canyon (an extension of Marian Bear Park) connecting to multiple wildlife corridors east of I-15.

Figure 4.5c - Regional Conservation Connections showing MCAS Miramar's connection with conserved lands, including MSCP lands in Marian Bear, Rose Canyon, Soledad Canyon, Carroll Creek, Sorrento Valley, Los Penasquitos Lagoon.

P. 4-25 - 4-26 contain important text descriptions of these wildlife corridor connections.

- **The Los Penasquitos Lagoon Restoration Phase 1 & 2**

A number of SB2S projects have the potential to have major impacts on Carroll Creek and Sorrento Valley, on areas that drain into them, and on areas that drain downstream into Los Penasquitos Lagoon. All SB2S projects must consider the downstream impacts on the existing conditions in the Lagoon and on the potential future restoration of Los Penasquitos Lagoon. The Lagoon is a State Marsh Natural Preserve that is part of the Torrey Pines State Natural Reserve, which is owned and managed by California State Parks. Furthermore, a number of projects in the 2021 Regional Plan that are not in this CMCP will also impact the Lagoon both individually and in combination with projects in this CMCP.

- **The North Coast Corridor bike path on the west side of I-5 from Sorrento Valley to Voigt Drive, connecting to UCSD, and to bike infrastructure through UCSD and from UCSD over I-5 to the UTC area.**

This bike path provides an excellent north-south Active Transportation connection between Sorrento Valley and Gilman Drive through UCSD, with east-west bike connections from UCSD over I-5 to the UTC area via both the Voigt and Gilman bridges. Gilman Drive connects from UCSD to the City of San Diego's fully-designed Coastal Rail Trail project that will add Class IV bike lanes on Gilman Drive between UCSD and the Rose Creek Bike Path. The City is seeking full funding of Gilman Drive stretch of the Coastal Rail Trail, which SANDAG should provide.

P. 76: Section 4.5 - Resilience

This section should address the issue of the impacts of climate change and increasing human impacts due to increased population density on MSCP lands, on other natural lands, and on threatened and endangered species. The CMCP also needs to consider the potential movement of species, including threatened and endangered species, toward more coastal areas due to temperature increases inland. This will increase the importance of protecting and managing natural areas, including MSCP lands, riparian corridors and wildlife corridors, in the SB2S corridor.

P 86: Section 5.1.11

Again, the SB2S CMCP needs to address goals and strategies that address the protection of MSCP and other natural lands, wildlife corridors, climate change impacts on native plant and animal species, and downstream watershed impacts, both individual and cumulative, from all its projects combined with increased population and development density.

P. 88: Goal 6

Change to: "Sustainability, Health, Resilience, Habitat and Species Conservation"

Objectives: Add “Reduce impacts to water, habitat, native species, MSCP lands, wildlife corridors, community or recreational resources.”

On P. 9. Under The University Community Plan description, the CMCP needs to include the December 2016 Community Plan amendment (Community Plan p. iv): “On December 5, 2016, the City Council adopted an amendment to the Transportation Element to remove the widening of Genesee Avenue from Nobel Drive to State Route 52, and the connection of Regents Road over Rose Canyon from the University Community Plan.”

V. Comments on Strategies that involve I-805 at Nobel Dr. & La Jolla Village Dr.

P. A2 - Reference Number 578

Strategy Name: I-805 Interchange and transit Operational Improvements at Nobel Dr.

Comment: SANDAG has assured FRC in writing that the addition of “DARs” at this location was an error and that the DARs will be deleted from the SB2S CMCP. They were not in the Regional Plan, and FRC has long strongly opposed them. The Project Name now in the 2021 Regional Plan is “Transit Operational Improvement.”

We urge SANDAG to modify Reference 578 to change its location to:

“I-805 Interchange and Transit Operational Improvements at La Jolla Village Drive.”

FRC continues to urge SANDAG to study ways to route BRT vehicles on and off I-805 at La Jolla Village Drive rather than Nobel Drive. The BRT/Rapid routes should go through the dense employment areas along La Jolla Village Drive starting right at I-805, where Illumina’s headquarters is located. The area along La Jolla Village Drive and on the north side of it to Executive Drive and Eastgate Mall is a rapidly growing area for biotech, high tech and commercial employment. There are many new high rise buildings, many more under construction, and more in the pipeline. This is a major change since the Nobel exit was first proposed years ago for BRT routes. In contrast, there is only one employer near Nobel Drive and no more employment will be built there. The area on the south side of Nobel is 100% conserved MSCP, with all development potential removed. Judicial Drive is not a potential BRT route from Nobel to La Jolla Village Drive, because Judicial passes through a tunnel under La Jolla Village Drive. If, as currently planned, BRT buses were to get on and off I-805 at Nobel, it will require a long, out-of-direction ride to get to and from high density employment.

With the technology SANDAG is proposing to support transit in the Regional Plan and the SB2S CMCP, there must be a way to get the BRT buses on and off I-805 at La Jolla Village Drive. Even if it takes the buses a little longer to get on and off at LJVD, the payoff is big: that is where the jobs are.

P. A-10 - Reference Number 671

Strategy Name: Rapid Route 870 - Transit Queue Jump Lanes

Description: Add transit queue jump lanes along the route from I-805 & Nobel Dr. to UTC

Comment: Again, get the Rapid Route 870 on and off I-805 at La Jolla Village Drive (the dense and rapidly growing employment area) rather than Nobel (with only one employer and a long out-of-direction bus ride to the dense employment area). Getting on and off at Nobel will diminish the “rapid.” See our comment above on Strategy 578.

P. A-10 - Reference Number 651

Strategy Name: Rapid Route 870 - Transit Signal Priority

Description: Add transit signal priority along the route from I-805 & Nobel Dr. to UTC

Comment: This project will not be necessary if you get the Rapid 870 on and off I-805 at La Jolla Village Drive. See our comments above.

P. A-10 - Reference Number 48

Strategy Name: Rapid Route 870 - SB2S Segment

Description: Add route on UTC via Santee, SR-52 & I-15

Comment: See above comments on Reference Numbers 651, 671 and 578. All these projects have the same problem and the same solution. Figure out how to get all the Rapid and BRT buses on and off I-805 at La Jolla Village Drive rather than Nobel, even if it takes them longer to get on and off. La Jolla Village Drive is an already dense and rapidly growing employment area. Nobel has one employer and will get no more. Whatever the technology fix is for one BRT/Rapid route can be applied to them all.

VI. Comments on Strategies that should be deleted from the SB2S CMCP and that are not in the Regional Plan

P. A-7 - Reference Number 8 - This project should be deleted from the SB2S CMCP

Strategy: UCSD to Sorrento Valley Skyway

Description: Add Skyway connecting UCSD to East Sorrento Mesa

(Please also see comments submitted by Andrew Wiese opposing this project.)

Comment: This project rightfully did not make it into the Regional Plan. Friends of Rose Canyon strongly opposed its inclusion in the Regional Plan. We are familiar with the area and the topography. This project would be an environmentally very difficult and destructive project due to the need to build and maintain huge towers on extremely steep slopes, much of it MSCP land. Huge towers would also need to be in areas already highly developed with highways, major roads, and dense development with high rise buildings. This project would be largely redundant given the proposed Purple Line. This project is a very expensive distraction from the multiple transit projects for the area that are in the Regional Plan.

P. A-13 - Reference Number 1263 - This project should be deleted from the SB2S CMCP

Strategy Name: Extension of Mid-Coast Trolley to Connect to LOSSAN

Description: Extend the Mid-Coast Trolley from its terminus in UTC to the Genesee Ave. bridge above Rose Canyon. Add another station for both the trolley and the COASTER and connect the two stations via stairs + elevator. Could also be a future CAHSR connection.

This project is rendered moot by the Coaster UTC tunnel project (Reference No. 61), which is in both this CMCP and the Regional Plan. Trains will no longer run here, since the tunnel entrance will be well west of Genesee Avenue with either alignment SANDAG is considering.

Comment: See Attachment: Map of Miramar Realignment Revised Alternatives, Comparative Analysis (Source: FY2021 SANDAG Transportation Committee Item 7, April 9, 2021.)

SANDAG, under Linda Culp, has analyzed and chosen for further study two tunnel alignment alternatives for the Miramar Realignment: The UTC and the Torrey Pines alignments.

FRC strongly supports either alignment of the tunnel.

Even if Reference Number 1263 were not rendered moot by the UTC Tunnel project, this project would be unlikely to ever get environmental clearance as it proposes to build two stations in the Rose Canyon riparian corridor. It would have major opposition from Friends of Rose Canyon and other

environmental organizations. And there will be no CAHSR here. When the CAHSR Authority conducted a route alternatives analysis in 2008, they eliminated the route through this part of Rose Canyon.

VII. Comments on Strategies that Impact the I-805/SR52 Intersection and surrounding areas

P. A-2 - Reference Number 1273

Strategy Name: SR-52 Managed Lanes from I-805 to SR-125

Description: Convert general purpose lanes, shoulder, and/or median to three managed lanes.

Comment: This project needs to be studied and designed in conjunction with all the other major highway projects in the CMCP and the Regional Plan that go through this same intersection. (Also see our comment for Reference Number 575). The complex I-805/SR-52 interchange and the highways around it (including all the proposed additional lanes) must improve the wildlife corridor between MCAS Miramar (at the intersection's NE corner) and Marian Bear Park (at the intersection's SW corner). This design needs to be done with input from environmental organizations and experts in wildlife movement, including movement of mule deer, an MSCP covered species. There is an existing highly constrained wildlife corridor beneath the existing I-805/SR-52 intersection. That wildlife corridor must be improved in the coordinated design of all the highway projects that will impact this area.

Reference Number 575 (ML Connectors W to N and S to E)

Same comment as above.

The Regional Plan contains additional projects that would impact this same intersection

- **CC028:** I-805 to I-5 increase from 4 Freeway lanes to 4 Freeway + 3 Managed Lanes) - that means 3 additional lanes through this intersection
- **CC086:** Managed lane connectors between I-805 and SR-52: North to West and East to South

Removing CC028 and CC086 from the CMCPs and the Regional Plan would make designing this extremely complex, multi-level intersection somewhat less complex.

During the Regional Plan planning process, FRC strongly opposed the addition of lanes on SR-52 between I-805 and I-5 and the ML Connectors from I-805 NB to 52 WB and 52 EB to I-805 SB.

Removing CC028 and CC086 from the Regional Plan would reduce the complexity of designing Reference Numbers 1273 and 575 for both vehicles and wildlife.

VIII. Comments on Active Transportation Strategies

P. A-14 - Reference Number 1292 - Delete the Roselle Canyon project (the project map is wrong)

Strategy Name: Coastal Rail Trail San Diego - Roselle Canyon

Description: Off-street improvements located in the University Community Hub AT Network, connecting I-5 NCC.

Comment: Confusing, but ...The map with this project shows the excellent current Gilman Drive Coastal Rail Trail (CRT) alignment, not the old Roselle Canyon alignment. The Roselle Canyon Coastal Rail Trail project is part of an old proposed alignment that the City of San Diego has long since rejected in favor of the Gilman Drive CRT alignment. The City (which is the Lead Agency for this project) removed the Roselle Canyon CRT alignment from the 2013 City of San Diego Bicycle Master Plan. The City has since been through a lengthy public input process and alternatives analysis and selected Class

IV bikeways on Gilman Drive as the alignment for the Coastal Rail Trail. There is broad community support for the Gilman CRT, including from UCSD, the City has fully designed the project, done environmental review, and is seeking full construction funding (which SANDAG should provide).

This Roselle Canyon Coastal Rail Trail strategy should be deleted from the CMCP. The Roselle Canyon stretch of this old alignment has major environmental and constructability problems, as does much of the rest of the old CRT alignment between Roselle and Gilman. When the Regional Bike Plan is updated, this old CRT alignment should be deleted and replaced with the current Gilman alignment, which includes the already completed I-5 bike path and two already completed major east-west bike connections from Gilman Drive to the UTC area over the Voigt and Gilman bridges.

Note: The stretch of Gilman on this map is by far the most important North-South bike connection through this area in both the SB2S and Coast, Canyons and Trails CMCPs. It will connect at the south end to the Rose Creek Bikeway, providing a bike connection all the way to Mission Bay. At its North end, it continues through UCSD to Voigt Drive, where it connects to the NCC Class I bike path to the Sorrento Valley Coaster Station. Thus the Gilman Drive Coastal Rail Trail Project (as shown on the map) will complete a bike connection from Sorrento Valley to Mission Bay.

P. A-18 - Reference Number 1300

Strategy Name: Coastal Rail Trail San Diego - Carmel Valley to Roselle via Sorrento

Description: Off-street improvements located in the Carmel Valley-Sorrento Valley Connection, connecting I-5 NCC, SR-56

Comment: Most of this is an excellent project. However, the portion of this project that extends east of the intersection with the I-5 NCC bike path by the Sorrento Valley Coaster Station needs to be deleted. By connecting to the I-5 bike path, Reference Number 1300 will complete the bike connection between Mission Bay and SR-56 (as soon as the Gilman Class IV bike project has been constructed). This is a huge accomplishment. But this project should not extend along Roselle Street east of the I-5 bike route connection. Roselle Street is a dangerous, constrained, high traffic area where there is no room to add bike lanes. Roselle Street east of the I-5 connection was part of the old CRT alignment created before the I-5 Bike path existed (see our comments above on Reference Number 1292).

P. A-19 - Reference Number: 146 - Delete this project from the CMCP- it is infeasible

Strategy: University Community-Kearney Mesa Connection

Description: 5 different bike connections

Comment: Re New trail connection from Nobel Dr. along I-805 to Copley Dr.

This project is not feasible. North of SR-52 there is not enough existing freeway width to add protected bike lanes along I-805. In places there are steep slopes along the freeway edges, and there is no room on the I-805 bridge to add bike lanes. There is no way to get a bike path north/south across the major interchange of I-805 and SR-52 (unless they invent aero-bikes). Even if there were, there would be no way to connect to Copley Drive, which is on a mesa at the SE corner of the 52/805 intersection with no connection down the slope to either I-805 or SR-52. In any case, it makes no sense to connect to Copley Drive, which is at the dead end of a long commercial street and not a place people would want to bike to.

Comment: Re Genesee Ave. to trail through San Clemente Park along CA-52 to Ruffin Road.

I don't believe this is feasible on either the north or south side of SR-52. Marian Bear Park is on the south side. There is not enough room for a bike path on the south side: in places there is a steep drop off

from the freeway and it's MSCP habitat. On either the north or south side of SR-52, I don't think you could get a bikeway east-west through the huge SR-52/I-805 interchange.

IX. Comments on the Purple Line

P. A-6 - Reference Number 3

Strategy Name: Route 582 (Purple Line) - Sorrento Mesa to National City via City Heights

Description: Add transit line from Sorrento Mesa to National City via Kearny Mesa, and City Heights

Comments: Between Kearney Mesa and UTC and between UTC and Sorrento Mesa, the Purple Line alignment would cross a great deal of environmentally sensitive land. This includes MSCP lands, vernal pools, already highly constrained habitat linkages and wildlife movement corridors, habitat for threatened and endangered species, steep slopes, wetlands, and two important coastal watersheds: the Rose Creek watershed (the primary fresh water tributary of Mission Bay) and Carroll Creek (which flows into Los Penasquitos Lagoon). The Purple Line alignment must be underground where it crosses these lands (from somewhere well east of I-805 all the way to UTC and from UTC to the Sorrento Mesa station). The environmental impacts of the Purple line on these areas must also be studied in combination with the impacts of all the highway, rail and other projects in this CMCP and in the 2021 Regional Plan that would impact the same areas.

Finally, we strongly oppose:

- any widening of the I-805 bridge over Rose Canyon
- any plan to further expand the existing built footprint of the I-805 between just south of SR-52 and north of Carroll Canyon Road
- any plan to impact Rose Canyon along Nobel Drive from I-805 to Genesee Avenue.

Next steps:

As next steps in the SB2S planning process, SANDAG should take the following actions so as not to piecemeal project selection, planning and environmental review of projects:

1. Initiate a public and transparent process that looks at the entire list of SB2S CMCP, CCT CMCP, and Regional Plan projects that would impact the I-805/SR-52 interchange and surrounding connected natural areas of Rose Canyon, Marian Bear Park and MCAS Miramar.
2. Initiate a public and transparent process that looks at the entire list of CMCP and Regional Plan projects that would impact the Sorrento Valley area and its natural lands, riparian corridors, and wildlife movement corridors.
3. Change the paradigm in SANDAG's planning process around the issue of environmental impacts. Over many years, we have seen the SANDAG paradigm of causing major environmental impacts in our more urbanized areas and exporting "mitigation" to distant mitigation banks. Usually this is done by calculations in small fractions, such as one tenth of an acre of wetland - as if it were a bank account where you could say the one tenth of an acre of diminished wetland here is "compensated for" by one tenth of an acre preserved twenty five miles away. Year by year under this accounting system, our urban natural environment continues to decline. And looking at the lists of projects in the Regional Plan and the SB2S CMCP and likely the CCT CMCP, the environment in our area will continue to decline. We

recommend SANDAG bring early on into its planning processes for CMCPs and RTIP updates and individual projects people with environmental expertise who will be tasked with avoiding impacts, preserving and improving local habitat, watersheds, connectivity and wildlife movement corridors, and considering the impacts of climate change on our urban natural lands. This should not be a math problem of “impacts” and “mitigation credits.” It is a problem of natural systems - plant and animal species, watersheds, habitat types, habitat and wildlife connectivity and corridors. Sometimes the calculus might be to decide not to build something. And in this process, we recommend consulting early on with local organizations like ours that know these last remaining areas well and are working to protect, preserve and restore them.

We thank you in advance for carefully reviewing our comments.

Sincerely,

Deborah Knight

Deborah Knight
Executive Director

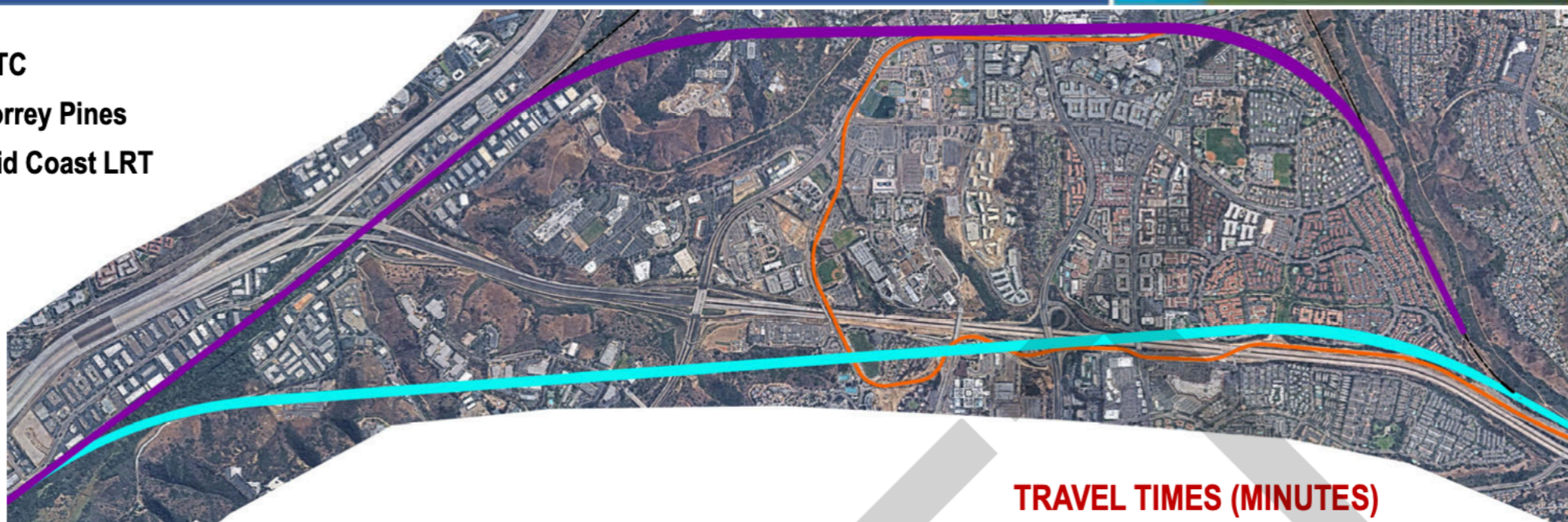
Attachments:

1. SANDAG alignment alternatives for the Miramar Realignment (UTC tunnel) - either alignment enters the tunnel well west of Genesee Avenue, making proposed Reference No.1263 infeasible.
2. FRC Highway Comments submitted on Draft Regional Plan 8/6/21
3. FRC CRT Comments submitted on Regional Plan 8/6/21
4. FRC Comments submitted on Regional Plan DEIR 10/11/21
5. I-Naturalist reports of the Mule Deer movement corridor between Sorrento Valley, Carroll Canyon, Soledad Canyon, MCAS Miramar, and Rose Canyon, indicating the importance of these last remaining wildlife corridors within the SB2S CMCP.

Miramar Realignment

REVISED ALTERNATIVES

- UTC
- Torrey Pines
- Mid Coast LRT



TRAVEL TIMES (MINUTES)

Solana Beach to Old Town

All Stop

Limited Stop

ALIGNMENT	PASSENGER/ FREIGHT MAX SPEED (MPH)	CAPITAL COSTS COMPARISONS	All Stop		Limited Stop	
			Charger + 5 Coaches	ZMU	Charger + 7 Coaches	ZMU
Base Condition	90/60	-	31	-	32	-
— Torrey Pines	110/60	Base	19.7	18.4	21	18.4
— UTC	110/60	+2%	20.3	18.9	21.8	19

Miramar Realignment

COMPARATIVE ANALYSIS

Evaluation Criteria	Weight (%)	Torrey Pines	UTC
Travel Time	14	5	4
Environmental Consequences	9	2	4
ROW Impacts and Acquisitions	6	1	3
Connectivity and Travel Demand	13	3	5
Safety Improvements	15	4	4
Constructability, Construction Impacts, and Duration	7	2	3
Capital Costs (includes construction, right-of-way, and design)	8	3	2
Railroad Operation Impacts (during construction)	5	3	2
Operational Complexity (post-construction)	9	2	3
O&M Costs	10	2	3
Community Acceptance	4	2	3
Total Score		292	351

RATING 5 4 3 2 1
Best ——— Worst

Friends of Rose Canyon
Deborah Knight, Executive Director
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Comments on the Draft 2021 Regional Plan - 8/4/2021

Our comments are focused on the geographic area that we are most familiar with: the area within and extending out from the I-805 / SR-52 / I-5 triangle. This includes the Rose Creek watershed (Rose Canyon, MCAS Miramar, San Clemente Canyon and Marian Bear Park, and Rose Creek extending south to Mission Bay) and the Carrol Canyon, Sorrento Valley, and Penasquitos Lagoon watershed. However, many of the concerns, issues and questions we raise in relation to this area apply to the entire RTP.

Our overall comment is that the 2021 Draft Regional Plan states that it proposes a bold new vision. However, it is based on a massive expansion of our highways. This includes widening many of our highways to add Managed Lanes and adding huge, elevated concrete "Managed Lane Connectors" (MLCs) where highways intersect. These MLCs will require even further highway widening to add lanes where traffic would enter and exit the connectors. In some cases these MLCs connect highways at very different elevations or with multiple other on and off ramps and bridges in the same location. Judging from just the area we focus on, these added MLs and MLCs will have huge direct and indirect environmental impacts on sensitive habitat, MSCP lands, Marian Bear Park, Rose Canyon Open Space Park, MCAS Miramar, and the Rose Creek and Carroll Canyon Creek/Sorrento Valley/Penasquitos Lagoon watersheds. Furthermore, just in the area we focus on, these MLs and MLCs will cost many hundreds of millions of dollars.

We ask: How much induced demand will adding all this highway capacity cause? How sure is SANDAG of their calculations? Will this plan really reduce GHG emissions, and by how much? How sure is SANDAG of those calculations? What is the course correction if we start adding all this highway capacity and the benefits are not there? Do the RTP models rest on the assumption that the projected benefits require that all the highway MLs and all the MLCs be added to achieve the projected benefits? What if we get half way into building this out and find that adding all this highway capacity is not bringing the benefits anticipated?

Based on what we see proposed for just the area we focus on, we see major direct and Indirect Impacts on MSCP lands, open space, habitat, native plant and animal species, wildlife corridors, creeks, and watersheds. Adding Managed Lanes and Managed Lane Connectors means bulldozing land and building extensive new concrete surfaces and retaining walls and drainage ditches, expanding direct impacts and edge effects on habitat and wildlife, increasing storm water run-off, noise and light impacts, invasive species, habitat loss, loss of wildlife connectivity and wildlife corridors, increased erosion, trash, and air and water pollution. "Mitigating" these impacts through projects done in distant mitigation banks does nothing to reduce the impacts in the areas where these impacts occur.

While SANDAG staff have stated in meetings with the QOL coalition that they are not widening outside the highway ROWs, that does not mean there won't be major highway widening and environmental impacts. In some cases, CALTRANS has sufficient ROW to widen by multiple lanes. And widening even within the ROW extends the damaging impacts and pushes the edge effects closer to and into sensitive habitat.

Meanwhile, the Purple Line (Commuter Rail 582) from Sorrento Mesa to the Border (a true transit project) will not be completed until 2050. In concept, we strongly support this project, assuming it is largely underground through the environmentally sensitive areas we focus on. But despite the importance of this transit project, we know little beyond the vaguest description of its route. Where might it be underground? Where might it be at grade or above grade? Why is it not being completed until 2050 while the RTP prioritizes adding so many highway MLs and MLCs?

I-805 North Project

On April 15, 2021, the Sierra Club sent the attached letter to SANDAG Director Hasan Ikhata, Director of Regional Planning Coleen Clementson, Senior Transportation Planner Jennifer Williamson, and several SANDAG BOD members. At a subsequent meeting with the Quality of Life Coalition's Transportation Committee, Coleen Clementson stated vehemently, "We agree with you." We therefore assume and would like confirmation, that the following is not in and will not be added to the RTP for the I-805 North from just south of SR-52 to Carroll Canyon Road:

- Any additional freeway widening beyond what has currently been built (one Carpool/ HOV lane in each direction was completed in 2016)
- Widening of the I-805 bridge over Rose Canyon
- Direct Access Ramps (DARs) at Nobel Drive
- A Park & Ride at the southwest corner of Nobel/I-805
- A bus station at the southwest corner of Nobel/I-805

Project ID CC114 is called I-805 (Nobel Drive) - it should be deleted from the RTP

Rationale: I-805 North should locate access to and from the Managed Lanes at La Jolla Village Drive, not Nobel Drive. La Jolla Village Drive has extensive high density employment and high density housing located between the LJVD/I-805 intersection and Genesee Avenue. At Genesee there are two trolley stations surrounded by existing and planned high density employment and housing. La Jolla Village Drive is the route BRT lines should use to enter and exit the I-805 MLs. Nobel Drive is a poor location for a BRT route to enter or exit I-805 MLs. The location is far from significant employment or housing density. Furthermore, no parking lot or bus station should be located at Nobel/805. The I-805 commute is south to north in the morning, so parking lots near the I-805 should be located in communities well to the south where commuters come from in the morning. The land at the Nobel/ I-805 intersection should be protected from any further impacts. Most of it is MSCP, and there are vernal pools and numerous documented sensitive species. That area should have no further disturbance.

The area within and near the SR-52, I-805, I-5

The RTP should reduce the amount of highway expansion and the number of MLCs in this area. SR-52 should not be widened and the MLCs between these highways should be eliminated.

The following projects would cause major environmental damage to MSCP lands and to the area's critical and already highly constrained wildlife corridors.

This area illustrates our concern about the RTP as a whole. The RTP proposes a massive expansion of highway capacity in the name of creating "Complete Corridors" that will, in theory, carry BRT lines and carpools. While it is true that some existing general purpose lanes will be converted to "Managed Lanes", the RTP proposes an expansion of all the highways in this area to add MLs plus multiple MLCs between these highways that will further degrade the habitat and wildlife corridors.

CC085: 2035 - MLC I-805 (SR 52) West to North and South to East CCT - \$149 mil

This MLC will cause major environmental damage to an area with important wildlife corridors that connect MCAS Miramar, San Clemente Canyon (and Marian Bear Park) and Rose Canyon. These wildlife corridors are identified in the MSCP and in the MCAS Miramar Natural Resource Management Plans. The wildlife corridor between MCAS Miramar and San Clemente Canyon is already highly constrained at the I-805/52 intersection. In addition, the elevation change between the I-805 and SR-52 is significant. A further environmental impact will occur due to adding two MLs to SR-52 east of I-805 and one ML to SR-52 west of I-805.

CC086: MLC I-805 (SR52) North to West and East to South (\$126 mil): More environmental impacts in this same area.

CC003 - (by 2035) - I-5 (Pacific Highway to SR 52) 8F to 6F+4 ML (\$353 mil) (adding 1 lane in each direction to I-5)

CC004 by 2035 I-5 (SR 52 to I-805) 8F to 6F + 4ML (adding one lane in each direction) (\$190 mil)

CC028 by 2050 MLC I-5 (SR 52) South to East and West to North (\$202 mil)

CC065 by 2050 Complete Corridor: ML SR 52 (I-5 - I-805) 4F to 4F + 3 ML (\$214 mil)

This massive widening of SR 52, with additional width needed to build the Managed Lane Connectors between I-5/52 and SR 52/ I-805 (MLCs in all directions) will have huge negative impacts on the adjacent MSCP lands in San Clemente Canyon and Marian Bear Park and on Rose Canyon and on the wildlife corridors between

CC066 by 2050 I-5 (SR 52) MLC - North to East and West to South (\$202 mil)



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August 6, 2021

Submitted via email: SDForward@sandag.org

Comments on the Draft 2021 Regional Plan

Active Transportation Projects:

The City of San Diego's chosen alignment for the Coastal Rail chosen between Gilman/La Jolla Colony Drive and Sorrento Valley Coaster Station should be added to the RTP and the old alignment should be deleted (Rose Canyon, "UTC" (along Judicial Drive), Roselle Canyon and Roselle St to the Sorrento Valley Coaster station). This old alignment was thoroughly studied and rejected due to multiple major problems.

The Draft RTP contains inconsistent and out-of-date labeling of a portion of the City of San Diego's Coastal Rail Trail. The City is the Lead Agency for the Coastal Rail Trail in the City, and it has selected the alignment and completed final design of the alignment along Gilman Drive to UCSD.

The City has deleted from its Bike Master Plan the old Rose Canyon, "UTC", and Roselle Canyon alignment. The City studied that route for years and rejected it for multiple reasons.

The RTP therefore needs to:

- cut three planned CRT segments and trim one CRT segment
- relabel the CRT route in the RTP to coincide with the approved Gilman Drive CRT segment, adding the UC San Diego CRT segment plus the I-5 Bicycle Corridor.
- Amend Appendix A and Appendix L in the SANDAG RTP to be consistent with this change.

The RTP should make the following changes summarized in the following tables:

CRT route as presented in the SANDAG RTP

SANDAG Project ID	Name/Description	SANDAG 2020 Cost	The RTP should make the following change	RTP Page reference
AT032	CRT - Carmel Valley to Sorrento to Roselle Canyon	\$20M	Change Carmel Valley to Roselle via Sorrento by removing Sorrento to Roselle. Carmel Valley to Sorrento remains.	Appendix A Table 1 p. A-6
AT036	CRT - Roselle Canyon	\$12M	Cut	Appendix A Table 1 p. A-6
AT037	CRT - UTC to Rose Canyon	\$11M	Cut	Appendix A Table 1 p. A-6
AT023	CRT - Rose Canyon	\$31M	Cut	Appendix A Table 1 p. A-8

The RTP needs to add the CRT route the City of San Diego has chosen for the segment from Sorrento Valley Coaster Station to the Gilman Drive/La Jolla Colony intersection

Segment	Start	End	Notes
CRT – I-5 Bicycle Corridor	Sorrento Valley	Voigt and Gilman	Already completed by Caltrans
CRT - UC San Diego	Voigt and Gilman Dr.	Gilman and La Jolla Village Dr.	UC San Diego is adding major bike infrastructure improvements through the campus on this route
CRT - Gilman	Gilman Dr. and La Jolla Village Dr.	Gilman Dr. and I-5 / Rose Creek Bike Path and La Jolla Colony Dr.	Protected bike lanes fully designed by City. Partial construction funding in SD City 2022 CIP budget.

Reallocation of funds and equity

The savings for the three old, out-of-date segments to be cut is \$53 million (Rose Canyon, UTC (Judicial Drive) and Roselle Canyon, plus any savings from trimming the route AT032 by cutting Sorrento to Roselle, a segment made unnecessary by the I-5 bike path from the Sorrento Valley Coaster Station to UCSD. Two of the three segments in the City's chosen CRT route are either complete or funded, so it can be anticipated that almost all of the \$53 million in the RTP can be freed up for active transportation projects that address equity, for example, in Chollas Creek, South Bay, or the Midway Corridor.

Community and City of San Diego support and action for the CRT alignment up Gilman:

The CRT route has City and Community support:

- The SANDAG RTP routes do not exist in the City of San Diego Bike Master Plan. They were explicitly deleted by the San Diego City Council in December 2013.
- The approved CRT Project route in San Diego has been selected, with the final Gilman Dr. link ready for construction and on the CIP list for 2020-2021.
- The approved CRT route was developed and selected by a City of San Diego Public Working Group in 2013-2014.
- The approved CRT route is supported by the Community Planning Groups: the UCPG in 2013 and 2021, and the La Jolla Planning Association in 2021.
- The approved CRT route has been supported by the City of San Diego in 2013, 2016 and budgeted in 2021.

The City's approved CRT route enhances important existing connections:

- With the Rose Creek bikeway open, it is a connecting link to UC San Diego from the south.
- With the existing I-5 Bicycle Corridor, it is a connecting link to UC San Diego from Sorrento and the Coaster.
- The completed UC San Diego Gilman Bridge over I-5 provides comfortable and safe bicycle links to the east UC San Diego Campus, industry along Eastgate Mail, and the commercial center at UTC.



Friends of Rose Canyon

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October 11, 2021

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

Submitted via email: Kirsten.Uchitel@sandag.org

Subject: Comments on the Draft EIR for San Diego Forward: The 2021 Regional Plan

Attachment: As an additional comment on the Draft EIR, we are resubmitting our Aug. 6, 2021 comments on the Draft Regional Plan about corrections needed to the San Diego Coastal Rail Trail project. These corrections were not incorporated in the Draft EIR, so we are submitting them again.

Dear Ms. Uchitel:

Friends of Rose Canyon (FRC) is a 501(c)(3) non-profit organization dedicated to the protection, preservation and restoration of Rose Canyon and the Rose Creek Watershed. The Rose Creek watershed begins east of I-15, crosses MCAS Miramar in two creeks (Rose Creek and San Clemente Creek, with Rose Creek flowing under I-805 and through Rose Canyon and San Clemente Creek flowing under the SR 52/I805 interchange and through San Clemente Canyon (also known as Marian Bear Park). San Clemente Creek joins Rose Creek at the SR-52/I-5 intersection. Rose Creek flows southward and is the main freshwater tributary of Mission Bay.

Much of the City-owned land in Rose Canyon is core MSCP habitat. Most of the City-owned land in San Clemente Canyon is part of Marian Bear Memorial Park and is core MSCP land.

FRC also works to protect habitat in areas near the Rose Creek watershed, including habitat adjacent to Carroll Canyon Creek, both east and west of the riparian corridor under I-805 that continues through Sorrento Valley to Penasquitos Lagoon.

1. We concur with the following comments in the DEIR Comment Letter submitted by SWIA:

- We strongly recommend the Plan be modified to reduce the number of managed lanes, initiate roadway pricing immediately, and increase transit options right away.

- Adoption of an alternative that prioritizes transit over the construction of new highway capacity. That could include converting existing lanes to Managed Lanes.

2. For road and rail projects in urban areas, the Plan should mitigate all environmental impacts in the area the impacts occur.

Our MSCP lands, wetlands, and wildlife corridors areas are the last remaining ones we have in our urbanized areas. They should be highly protected from further environmental impacts. Yet the DEIR indicates that multiple proposed road and (presumably) rail projects in the 2021 RTP would have highly negative direct and indirect impacts on these MSCP lands and wildlife movement corridors. We strongly disagree with the assumption in the DEIR that these impacts are acceptable. The approach is the usual mantra of impacting the urban habitat and mitigating far away. Historically in the Rose Creek watershed SANDAG has not mitigated impacts to urban habitat in the area those impacts occurred. SANDAG has instead mitigated the impacts at distant mitigation banks. Over time, this approach has led to a cumulative and ever-increasing degradation of our urban habitat areas, including urban MSCP lands, wetlands, riparian corridors and wildlife movement corridors. For example, SANDAG's \$30 million Rose Creek Bikeway project, completed last year, impacted the Rose Creek riparian corridor with construction of a major concrete structure for the bikeway. The creek in that location is a highly degraded urban waterbody, thick with invasive plant species and full of trash. It would have been a prime location for SANDAG to do wetland mitigation. Instead, SANDAG exported the mitigation to a distant mitigation bank, leaving Rose Creek as bad or worse than before. Bicyclists using this \$30 million bikeway cycle along the edge of this still highly degraded creek. Similarly, SANDAG's recent MidCoast Trolley Project and Elvira to Morena Double Tracking Project impacted Rose Creek riparian areas with multiple new concrete structures. Yet SANDAG carried out mitigation for those impacts in distant mitigation banks

The DEIR proposes to continue this practice. It dismisses the impacts to our urban MSCP lands and watersheds by proposing to do mitigation elsewhere. The DEIR should instead acknowledge that in reality when impacts to urban area habitat are mitigated elsewhere, the environmental impacts in the urban area are permanent and cumulative.

The Plan promotes concentrating growth in high density urban areas in order to promote environmental benefits related to climate change and air quality. The Plan should therefore take a new approach to the environmental impacts of the projects it proposes to build in those urban areas: it should strongly consider not building road and other projects that impact urban MSCP lands, riparian areas, wildlife corridors and parks and mitigate impacts that do occur due to projects in urban areas in the area they occur,

3. The Plan fails to identify the existence of Marian Bear Memorial Park. It is one of the City of San Diego's oldest Open Space Parks, and it provides recreational and nature enjoyment opportunities in an area that is increasingly urbanized (thanks in part to SANDAG's projects). The area is also core MSCP and provides key wildlife corridor linkages to Rose Canyon in the west and MCAS Miramar in the east. Nevertheless, the Plan proposes a massive highway

project on SR-52 immediately adjacent to the park and MSCP, and likely cutting into it.

The following projects should be removed from the Plan:

For SR 52 between I-5 and I-805:

- **Remove the proposed three additional lanes (4 F to 4F + 3 ML)**
- **Remove the Managed Lane Connectors going in all directions between SR-52 and I-5**
- **Remove the Managed lane connectors between SR 52 EB and I-805 SB**

Marian Bear I Park is immediately adjacent to this entire stretch of SR 52. Marian Bear Memorial Park, one of the City of San Diego's oldest open space parks. The Plan fails to identify its existence. The Park's trails provide beloved recreational opportunities for residents who live in the increasingly dense surrounding areas, a density increase that is promoted by the Plan as one of its core goals. The Plan is working at cross purposes if it simultaneously promotes major density increases in this area while simultaneously building a huge noisy intrusive highway project immediately adjacent to the very park that makes life move livable in those increasingly dense areas.

Marian Bear Park is core MSCP habitat. It provides wildlife corridor connectivity via the ever more constrained wildlife linkages to Rose Canyon in the west, to MCAS Miramar in the east, and to the south via the Rose Creek riparian corridor to Mission Bay. SANDAG's projects have increasingly constrained these corridors in recent years: with the Midcoast Trolley and the Elvira to Morena Doubletracking projects at the west end, and with the previous construction of the SR-52/I-805 intersection which left only a hugely constrained undercrossing for wildlife between Marian Bear Park and MCAS Miramar.

4. Adding road capacity produces induced demand: the Plan should significantly reduce the number of lane miles of roadway it proposes to build.

As the DEIR states, the Regional Plan adds a large amount of capacity to our roadways: It would add 799 lane miles of roadway by 2050 (Figure 4.16-74).

- 412 miles of additional freeway miles
 - 32 miles of additional State Highway miles
 - 392 miles of additional arterial miles
 - 7 miles of Tollway (the plan removes 38 miles of Tollway)
- a. The DEIR needs to explain its assumptions and conclusions around induced demand. It is now well accepted that adding road capacity induces demand. Induced demand occurs with HOV lanes as well as general purpose lanes. A potential way to address the issue of induced demand is with an aggressive pricing structure. But the issues around the pricing of Managed Lanes/HOV Lanes and whether and how much pricing impacts induced demand and VMT are debated. Moreover, while the construction of the 799 lane miles of new road capacity is built into the plan, no specific pricing structure is guaranteed. The DEIR should explain what its models show the pricing would need to be to counter the issue of induced demand and reduce VMT. Would it apply to general purpose lanes as well as managed lanes? What decisions would need to be made, and by whom, to implement the pricing

structure ? Would it be a road user charge? Given the unpopularity of the concept of a road usage charge, what is the likelihood of a pricing policy being implemented that is aggressive enough to counter the forces of induced demand?

Moreover, the DEIR proposes to move quickly to add road capacity: it would add 245 of those new lane miles by 2025, including 23 miles of General Purpose Lanes, 39 miles of HOV/Managed Lanes, 10 miles of Tollway, 27 miles of State Highway and 146 miles of Arterials.

The DEIR thus proposes to front load the proposed new road capacity projects before it is clear what the fee structure will be and what the impact of that fee structure is in terms of VMT, GHG emissions, and induced demand. And what will be the ridership of transit using the Managed Lanes? And what is a realistic time frame for when a comprehensive toll or road usage charge would be implemented? Will it be for use of both Managed Lanes and General Purpose Lanes? What vehicles will be allowed to use the MLs and under what conditions? (SANDAG staff have said that in their model, Single Occupancy Vehicles would be allowed to use the Managed Lanes.)

The Plan should be modified to reduce the construction of Managed Lanes built and implement the fee structure and some BRT routes to establish the viability of the Plan.

5. A major impact of the 799 new lane miles of roadway in the plan is severe and unmitigated environmental impacts to MSCP habitat and wildlife corridors and movement. (It is unclear how many of these would be due to commuter rail and LOSSAN projects, since their alignments are not specified).

- The Regional Plan (p. 4.4-112) Table 4.4-18 states that Transportation Network Improvements will encroach onto 78 acres of City of San Diego MHPA 100 Percent Conserved lands and 132 acres of MSCP South County Hardline Preserve, and 13 acres of Conserved Lands and Habitat Preserves.

A number of these impacted acres are in the urban areas of the City of San Diego, where MSCP habitat and wildlife corridors are already highly impacted and constrained. Removing from the Plan the projects on SR-52 between I-5 and I-805 (including the connectors) would reduce the impacts on the MSCP.

6. Wildlife Corridors and Linkages

In yet another acknowledgment of the severe environmental impact from the Plan's additional roadways, the DEIR states: "Almost the entire planned transportation network could potentially affect regional wildlife corridors and linkages."

The DEIR states on P. 4.4-35:

"A primary landscape features (sic) known to provide wildlife movement are ridgelines and drainages. Riparian corridors provide sufficient structural vegetative cover to allow the passage

of many different types of wildlife. ...In many parts of Southern California, the linear habitat provided by riparian corridors is the only habitat left providing connectivity to core areas or unfragmented habitat patches. The Regional Plan, through land use and regional growth and climate adaptation and resiliency policies, intends to include wildlife movement corridors in the planned transportation network by conserving existing known corridors, identifying local corridors, and facilitating wildlife movement through project design.”

The Plan should do exactly as it proposes to do by conserving the existing corridors in Marian Bear Park and deleting from the Plan the proposed three additional lanes and the huge connectors proposed to be on the SR 52 between I-5 and I-805. The corridor at SR 52 and I-805 is particularly constrained. If any of the proposed connectors at this location are built, it could be the final blow for that wildlife corridor.

Another reason to remove from the Plan the MLs on the 52 between I-5 and I-805 and the ML connectors to I-5 and I-805 is that both the I-5 and I-805 intersections already include a multi-level spaghetti pile of concrete roadways. Adding yet more would likely be extremely expensive and require rebuilding the existing portions of the spaghetti pile.

Figure 4.4-15: Regional Wildlife Movement Corridors. This shows the constrained wildlife movement corridors between Rose Canyon and MCAS Miramar and Marian Bear Park and MCAS Miramar, and in turn connectivity from MCAS Miramar to areas east of I-15, including Mission Trails and MCAS Miramar lands.

Direct impacts to wildlife movement by 2050

The Plan identifies Transportation Network Improvement impacts on the following acres of MSCP Core and linkages and SDSU Climate Resilient Wildlife Movement Corridors:

35 acres by 2025

554 acres between 2026 and 2035

440 acres between 2036 and 205

Again, reducing the number of additional lane miles of roadway would reduce this impact.

7. I-805/Nobel

The DEIR states (P. 4.4-71) that between 2026 and 2035, many of the Plan’s projects are not expected to result in greater than a 5-acre loss of sensitive vegetation communities. However, two that are include:

I-805 from SR 52 to Carroll Canyon Road

I-5 widening along Rose Canyon

The DEIR should delete from the plan Project ID CC114 (Complete Corridor: Transit Operational Improvement at I-805/Nobel Drive). This may be the project that would cause a greater than 5 acre loss of sensitive vegetation communities (referred to on Page 4.4-71) Assuming it does, there is no need for a project at Nobel/805. Presumably, this project is to

get BRT buses on and off at Nobel. However, this is concept is a holdover from an ill-conceived project many years ago and should be eliminated. There is no reason to get BRT buses on the 805 and off at Nobel Drive. It is far from the jobs/housing density that the BRT route is designed to serve. The DEIR should delete any proposed changes to the Nobel/805 location. The habitat at the Southwest corner is critical habitat for spreading Navarettia and has multiple special status species. It should not be impacted. Any BRT route on the I-805 should get on and off at La Jolla Village Drive or Mira Mesa Blvd or Sorrento Valley Road. There are existing high density jobs all along LJ Village Drive to Genesee Avenue and UTC, with lots more density planned for the coming years. There is also high density housing, with lots more likely to come. Coming SB on the I-805 from Sorrento Valley, the BRT buses can simply get on the I-805, stay in the auxiliary lane, and exit at LJ Village Drive, a distance of about a mile. For BRT buses entering I-805 NB at LJ Village Drive, they can stay in the on ramp and then almost immediately enter the off ramp for Sorrento Valley Road

8. Intended Uses of the EIR (2.6, p. 2-72)

The DEIR should clarify that Project level EIRs will likely be required for a high percentage of the road and rail projects. It is worrisome that the DEIR states: "Subsequent activities implementing the proposed Plan will be examined in light of this EIR to determine whether additional environmental documentation, if any, such as a Negative Declaration, Supplemental or Subsequent EIR, or Addendum, must be prepared. We have seen CALTRANS prepare an MND for a huge, highly environmentally impactful highway project. Future avoidance of appropriate project level environmental review should not be suggested or implied.

Sincerely,

Deborah Knight
Executive Director



Observations



Southern Mule Deer



San Diego, CA, U

Bounding Box

116
OBSERVATIONS

1
SPECIES

Map

Grid

List



Places of Interest



Ellen Browning
Scripps Memorial Pier
Matlahuayl
State Marine
Reserve

Scripps
Institution of
Oceanography

Gilman Dr

TORREY PINES

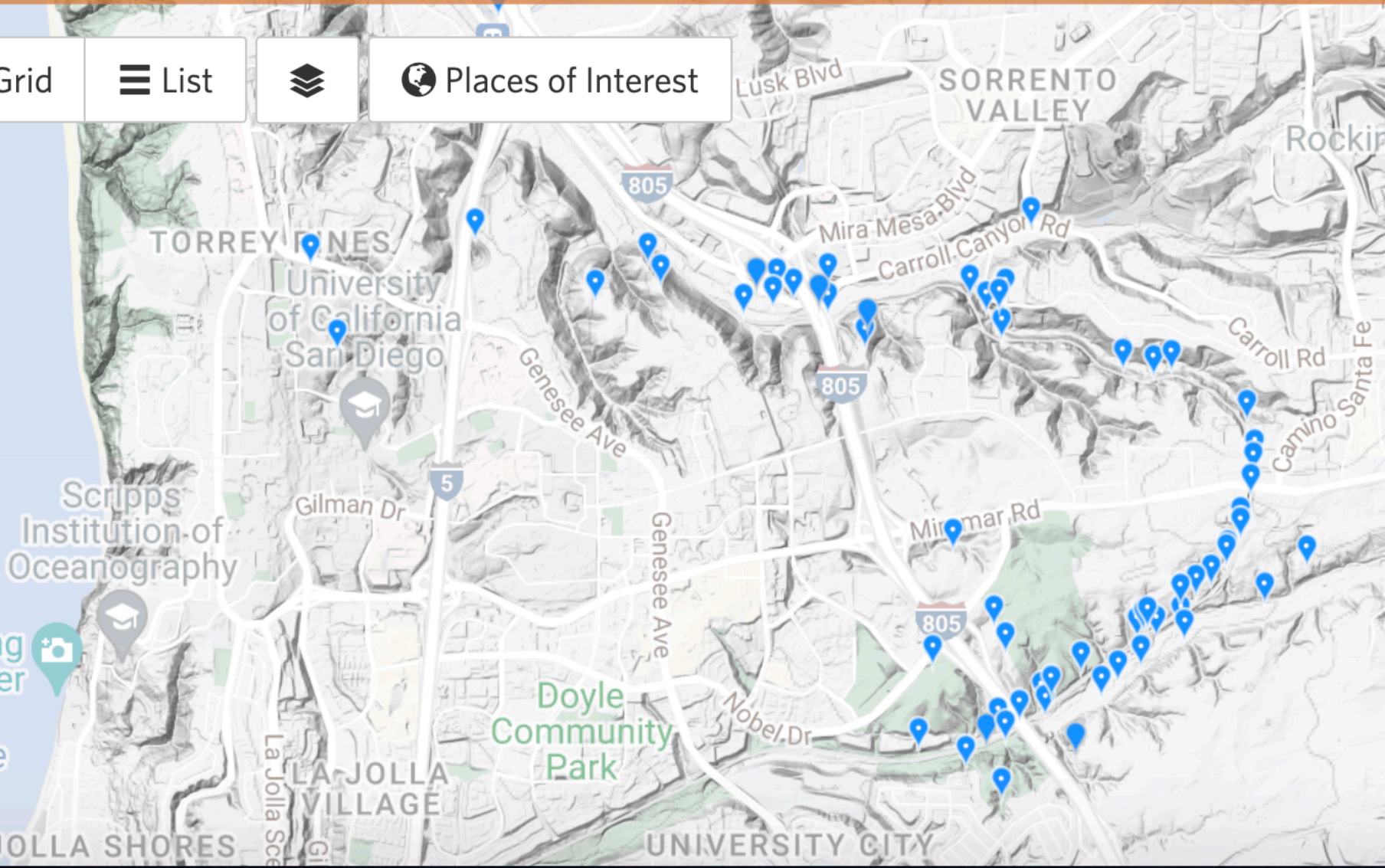
University
of California
San Diego

Doyle
Community
Park

LA JOLLA SHORES

LA JOLLA
VILLAGE

UNIVERSITY CITY



July 29th, 2022

Jennifer Williams SANDAG

401 B Street, Suite 800, San Diego, CA 92101, Attn: SB2S CMCP

The South Bay to Sorrento Corridor is an important corridor for a variety of trips, near and far throughout the many diverse communities this project area incorporates. It's a huge task, so thank you for addressing the response to the release of a document labeled "Recommended Transportation Solution Set" in the South Bay to Sorrento Comprehensive Multimodal Corridor Plan

My name is Nicole Burgess, an advocate for Active Transportation, efficient transit, and quality of life for all. I collaborate with BikeSD, Climate Action Campaign, the Chollas Creek Coalition, the Quality of Life Coalition and other local community groups to encourage healthy lifestyles that will help us adapt to the climate related challenges that we will continue to face. I address specifics in the document, including overall thoughts, concerns, and recommendations for the plan.

Table 3.1 Goals, Objectives, and Performance Measures

Goal: Sustainability, Health and Resilience

It is listed as the last goal. It should be prioritized and be listed as the number one goal.

Goal: Improve Mobility

This should be the last goal and relieving congestion should not be a top priority of this plan but rather an outcome of meeting the other goals listed.

SANDAG projects that are being planned should be informed by the newest strategies from the state including those in the CalSTA's Climate Action Plan for Transportation Infrastructure (CAPTI), specifically, but not limited to;

- Building toward an integrated, statewide rail and transit network
- Investing in networks of safe and accessible bicycle and pedestrian infrastructure
- Making safety improvements to reduce fatalities and severe injuries of all users

toward zero

- Assessing physical climate risk for transportation infrastructure projects
- Promoting projects that do not substantially increase passenger vehicle travel

Page 34 Complete Corridors:

Stated "Managed Lanes, Direct Access Ramps to Managed lanes, and Direct Connectors between managed lanes of two different roadways. Also includes arterial improvements for military-related strategies. Accounts for the updated Regional Arterial System that includes improvements to selected state highways, primary arterials, and other major streets as needed."

Super concerning that active transportation is not discussed as part of complete corridors. This is a huge Red Flag! Recommend that pedestrian, bike, and micro mobility access be a part of

every transportation project in this document. If SANDAG is building a ramp to connect 805 N to I-15, then access for pedestrians to get across this huge freeway system must be acknowledged, addressed, and improved. Our freeway system has continued to separate communities and this plan still is planning larger ramps and more VMTs through these environmental justice communities and it is time to stop and rebuild a better system to reconnect these communities. Providing on-street bike networks and trails connecting to the Chollas Creek Regional Park, San Diego River, the Rose Creek Watershed, Sweetwater River and the Otay River Valley should be the vision for improving mobility, clean water, and outdoor space for quality of life for all residents in this corridor study. Building a park over the 94 is a great example to provide access and connectivity between communities that have been separated by our freeway system.

Recommend implementing traffic-calming measures including, but not limited to: protected bike lanes, roundabouts, raised pedestrian crossings to improve to ensure a safer biking and walking experience when any and all transportation projects are built.

A “Complete Corridor” must address active transportation in all efforts.

Page 44: No Build Alternative, Alternative 1-3

In order to exceed State of California standards for GHG reduction goals, it is recommended that SANDAG evaluate a fourth alternative with strategies that meet the prioritized goals of Sustainability, Health, and Resilience and Improving Safety.

Page 45: Project Spotlights

Appreciate the Purple Line as being a top priority and believe that will be the region's best strategy for changing mode shift throughout this corridor.

Page 47: Harbor Drive Multimodal Corridor Improvements (600)

As a highlighted project it is extremely important that the connection to Chollas Creek Multiuse Trail is part of these efforts. The Chollas Creek is a direct connection to the Bayshore Bikeway, the waterfront, jobs, military. Creating a grade separated path along the creek to connect to Bayshore Bikeway shall be a top priority for this project.

Recommended Transportation Solution Set

Support resilient planning including, but not limited to, 411: Protect I-5 from Sea Level Rise Support the listed Active Transportation projects, but believe there is much work to do to work with communities and stakeholders to identify specific connections throughout this corridor. The current list of active transportation improvements is not complete for this corridor study.

There are many transit related projects, including BRT, and we encourage SANDAG to accelerate those plans. This does not however include HOV and/or managed lanes. Electric rail is much more viable as the sustainable, efficient, extremely low carbon emissions solution for freight. Electric Cars, the proposed transit leap with managed lanes, is not the solution to our climate crisis and SANDAG should consider healthy active commutes supported with efficient transit as seen in other countries to really change our mode shift. With the evolution of electric

bikes, there is no reason our region cannot become a bike mecca as seen in Copenhagen, Paris and other cities embracing healthy active commutes.

With limited funding, it is important that this agency use money wisely.

Most importantly there is great environmental opposition to freeway expansions anywhere in the region as it is what increases Vehicle Miles Traveled.

The managed lanes approach is super expensive and an environmentally dangerous approach; adding more travel lanes and the many necessary ramps for this connected network to work successfully is a huge undertaking at a large cost while only providing a little congestion relief for a few years. No additional lanes should be added to freeways unless they are transit only lanes!

It is extremely valuable to invest in transit, increase transit frequencies and offer late night and weekend service improvements with 24-hour service on major routes; ensuring bathroom facilities are designed, implemented and maintained at all major transit stops and mobility hubs. Wayfinding, lockers, bike racks, and first/last mile connections are recommended to be part of all transit projects.

Projects shall include natural based planning with funding for trees to build resilient outdoor space for healthy mobility options and support the resilient planning projects to address sea level rise, heat islands, clean water, and the projects that address multi beneficial issues.

Multimodal access to the coast and beaches, specifically transit and active transportation from communities of concern, is extremely valuable for this project area; improving quality of life for all while maximizing ecotourism for a vibrant and healthy city.

It is important for SANDAG to begin to prioritize Active Transportation projects to create the right environment for mode shift away from single occupancy vehicles in all areas of the SANDAG region by making walking, biking, and micromobility safe for all ages and abilities.

Lastly, as a consistent stakeholder to the Military Working Group since it was established several years ago at SANDAG, I want to provide personal observation to the Multimodal Access Study that this CMCP relies heavily on. I participated in the workshops and conversations and do not support many of the listed strategies for multimodal access to the bases. Unfortunately when decision makers only use one mode of transportation, the vehicle, then they often only provide car centric solutions. This was the problem with this multi year long military planning effort. Basically, this plan maintains the status quo and only provides strategies of roadway expansions and new ramps to relieve traffic congestion. Making it easier to drive will only create more VMTs and does not address the multitude of other issues our region will face. This group did identify some active transportation projects and listed improving the Bayshore Bikeway from IB to Coronado. This is a great corridor with large ridership and that is why this group chose to highlight it to be improved. It is important to acknowledge that this corridor already has access and a safe bikeway and many people drive to this area to enjoy a safe bikeway. As an active

transportation advocate, it makes no sense to spend more money to improve a class I bikeway when in actuality we need more of these pathways throughout our city for all our communities to enjoy access and outdoor space without having to get in a car to drive to access a safe bikeway. Please prioritize new Class I bikeways rather than expand one of our already built well maintained pathways.

Thank you to the SANDAG staff for working hard to address the needs of all stakeholders' in the corridor study and taking public comments and recommendations seriously to consider how this process/document can continue to be improved.

Nicole Burgess
Community Advocate for Healthy Lifestyles