Board of Directors Agenda

Friday, December 10, 2021
>>Please note start time<<
8:30 a.m.

**Teleconference Meeting**

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

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

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Message from the Clerk

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

Vision Statement
Pursuing a brighter future for all.

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

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

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

We are committed to creating a San Diego region where every person who visits, works, and lives can thrive.
Board of Directors  
Friday, December 10, 2021

Item No.  Action

1. Public Comments/Communications

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

Report

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

Coleen Clementson, SANDAG

The Board of Directors is asked to:

1. Adopt Resolution No. 2022-09, certifying that the Final Environmental Impact Report (EIR) for San Diego Forward: The 2021 Regional Plan (Regional Plan) has been completed in compliance with the California Environmental Quality Act (Public Resources Code §21000 et seq.), that the Final EIR was presented to, reviewed, and considered by the Board of Directors prior to approving the Project, and that the Final EIR reflects the independent judgment and analysis of SANDAG; and adopting the Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program; and

2. Adopt Resolution No. 2022-10, adopting the air quality conformity determination, finding that the Sustainable Communities Strategy (SCS) achieves the regional greenhouse gas reduction targets established by the California Air Resources Board, and adopting San Diego Forward: the 2021 Regional Plan, including its SCS, its supporting analyses, and the Series 14 Regional Growth Forecast.

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

Coleen Clementson, SANDAG

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

4. Member Comments

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

5. Upcoming Meetings  Information

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

6. Adjournment

+ next to an agenda item indicates an attachment
2021 Regional Plan and Final Environmental Impact Report

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

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

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

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

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

Schedule/Scope Impact:
Assembly Bill 1730 (Gonzalez, 2019) requires SANDAG to adopt an updated regional transportation plan by December 31, 2021.
The **Final EIR** consists of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A-O), including revisions; and (3) comments received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; SANDAG responses to significant environmental issues raised in the review and consultation process; and other information (Appendix P-1 of the EIR and Attachment 2 to this report). SANDAG received 51 communications, each containing multiple EIR comments, during the public review period. The Final EIR incorporates changes made to the Draft EIR as a result of comments received during the public review period and changes made to the Draft 2021 Regional Plan. Comments and changes made to the Draft EIR did not result in any new significant impacts not addressed in the Draft EIR or a substantial increase the severity of significant impacts identified in the Draft EIR.

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

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

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

### 2021 Regional Plan

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

**Air Quality Conformity Determination**

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

**Achieving Senate Bill 375 Greenhouse Gas Emissions Reduction Targets**

Chapter 2 of the Regional Plan includes the Sustainable Communities Strategy – A Framework for the Future and Appendix D contains the SCS Documentation and Related Information. Appendix D describes how the 2021 Regional Plan fulfills requirements for the SCS described in SB 375, including the reduction of greenhouse gas emissions with implementation of the SCS. The state-mandated target is a 19% reduction—compared with 2005—in per capita greenhouse gas emissions from cars and light duty trucks by 2035. The 2021 Regional Plan achieves a 20% reduction by 2035. After the Regional Plan is adopted, CARB staff will collaborate with SANDAG staff to complete its technical evaluation, allowing CARB to determine that the Regional Plan, and its SCS, if implemented, achieve CARB’s SB 375 greenhouse gas emission reduction targets. The CARB Executive Officer will issue an Air Resource Board executive order accepting or rejecting the determination.
Appendix F of the Regional Plan describes the Series 14 Regional Growth Forecast and SCS Land Use Pattern. The Regional Growth Forecast aligns with the regional forecast from the California Department of Finance and includes the 2050 forecast of population, jobs, and housing units for the entire region. These region-level data are then allocated to the subregional areas using the most recent planning assumptions considering local general plans and other factors. The SCS land use pattern is a subregional allocation that is a vision for land use in the region. In developing the SCS land use pattern, staff considered SB 375, which requires the SCS to include a land use pattern that contributes toward the regional greenhouse gas reduction targets when combined with the transportation network, policies, and programs.

Public Participation and Response to Comments

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

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

Next Steps

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

Hasan Ikhrata, Chief Executive Officer

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

Attachments:
1. Resolution No. 2022-09
2. Final EIR Appendix P-1
3. Resolution No. 2022-10
4. Discussion of Topics in SANDAG Board of Directors Resolution No. 2021-17
5. Appendix C: Air Quality Planning and Transportation Conformity
6. Public Comments and Responses on the Draft 2021 Regional Plan Received after August 6, 2021
A Resolution of the San Diego Association of Governments Board of Directors Certifying the Final Environmental Impact Report Prepared for San Diego Forward: The 2021 Regional Plan (SCH# 2010041061), and Adopting Environmental Findings Pursuant to the California Environmental Quality Act; a Statement of Overriding Considerations; and a Mitigation Monitoring and Reporting Program

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

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

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

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

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

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

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

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

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

WHEREAS, SANDAG provided copies of the Draft EIR for public review at the offices of SANDAG, the San Diego Central Library, and on its website at www.sdforward.com; and
WHEREAS, during the 45-day comment period, SANDAG consulted with and requested comments from responsible and trustee agencies and the public pursuant to CEQA Guidelines Section 15086; and

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

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

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

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

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

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

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

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

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

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

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

WHEREAS, the Project will have significant impacts that cannot be mitigated to less than significant levels, and SANDAG has prepared a Statement of Overriding Considerations in compliance with Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093 (attached as Attachment 1B), which concludes that specific economic, legal, social, technological, and other benefits of the Project outweigh the significant and unavoidable impacts identified in the EIR; and
WHEREAS, SANDAG has prepared a Mitigation Monitoring and Reporting Program in compliance with Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097 (Attachment 1C) to ensure implementation of the mitigation measures identified in the Final EIR during project implementation; and

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

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

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

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

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

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

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

PASSED AND ADOPTED this 10th of December 2021.

Attest:

Chair

Secretary

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

**Advisory Members**: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, Port of San Diego, San Diego County Water Authority, Southern California Tribal Chairmen’s Association, and Mexico.
Ⅰ. INTRODUCTION TO CEQA FINDINGS

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

A. PROJECT DESCRIPTION SUMMARY

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


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

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

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

Building on the current transportation system with funding anticipated over the next 30 years, the proposed Plan is anchored in the 5 Big Moves: Complete Corridors, Transit Leap, Mobility Hubs, Flexible Fleets, and Next OS. Each of the 5 Big Moves will tackle an aspect of the total transportation system, but the success of each will rely on the success of the others and they will be inextricably linked. The outcome will be more mobility options for everyone and a shift away from overloading the region’s roadways with cars. The proposed Plan’s SCS shows how the region would exceed the SB 375 GHG emissions reduction targets for passenger vehicles established by CARB for 2020 and 2035 by using land in a way that makes development more compact, conserving open space and investing in a transportation network that reduces per capita vehicle miles traveled and gives residents alternative transportation options.
B. PROJECT OBJECTIVES (EIR SECTION 2.4)

SANDAG developed the following project objectives for the EIR:

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

C. TYPE OF EIR

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

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

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

D. PROCEDURAL COMPLIANCE WITH CEQA

SANDAG published a Draft EIR on August 27, 2021, and a Final EIR on November 30, 2021, in compliance with CEQA requirements. SANDAG prepared the Final EIR in accordance with CEQA and the CEQA Guidelines. As allowed for in CEQA Guidelines §15084(d)(2), SANDAG retained a consultant to assist with the preparation of the environmental documents. SANDAG, acting as lead agency, has directed, reviewed, and edited as necessary all material prepared by the consultant,
and such material reflects SANDAG’s independent judgment. In general, the preparation of the EIR included the following key steps and public notification efforts:

- A 60-day scoping process began with SANDAG’s issuance of the Notice of Preparation (NOP) of an EIR on November 14, 2016. The NOP was filed with the State Clearinghouse on November 14, 2016, which started a 60-day comment period that ended January 13, 2017. SANDAG noticed and held an EIR scoping meeting on December 8, 2016, at the SANDAG Office at 401 B Street, San Diego, CA 92101 to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

- SANDAG issued the Draft EIR on August 27, 2021. The Notice of Availability for the Draft EIR was published in local newspapers and mailed to an extensive distribution list. The Draft EIR was also posted on SANDAG’s website and was available for review at the SANDAG Office. In addition, Draft EIRs were distributed to those who provided comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, public libraries, and other interested parties and stakeholders.

- The Notice of Completion for the Draft EIR was filed with the State Clearinghouse on August 27, 2021. The Draft EIR was available for a 45-day public review period starting August 27, 2021. Following close of the public review period, SANDAG revised the Draft EIR, including the project description, in response to comments received during the public review period, and provided written responses addressing all significant environmental issues raised. Revisions made to the Draft EIR are shown throughout the Final EIR in strikethrough and underline text.

- SANDAG published the Final EIR on November 30, 2021. SANDAG provided written responses to all public agencies that commented on the Draft EIR 10 days prior to certifying the EIR. The SANDAG Board of Directors held a public hearing on December 10, 2021, to consider certification of the Final EIR.

E. INCORPORATION OF FINAL EIR BY REFERENCE

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

II. FINDINGS REGARDING ENVIRONMENTAL IMPACTS

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

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers,
make infeasible the mitigation measures or alternatives identified in the environmental impact report. (The concept of infeasibility also encompasses whether a particular alternative or mitigation measure promotes the Project’s underlying goals and objectives, and whether an alternative or mitigation measure is impractical or undesirable from a policy standpoint. See City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 410; California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957.)

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

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

III. FINDINGS REGARDING ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT

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

A. AIR QUALITY (EIR SECTION 4.3)

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

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

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

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

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

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

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

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

BIOLOGICAL RESOURCES (EIR SECTION 4.4)

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

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

Regarding cumulative impacts, the Plan’s impacts related to conflicts with adopted policies of HCPs and NCCPs and other local policies and ordinances protecting biological resources, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans and other cumulative projects, wound not cause a significant cumulative impact. Therefore, the Plan’s incremental impacts related to conflicts with adopted HCPs
and NCCPs and other local policies and ordinances protecting biological resources (BIO-4) are not cumulatively considerable in 2025, 2035, and 2050.

C. CULTURAL RESOURCES (EIR SECTION 4.5)

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

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

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

D. ENERGY (EIR SECTION 4.6)

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

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

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

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

The SANDAG Board of Directors finds that implementation of forecasted regional growth and land use change and planned transportation network improvements and programs would not result in increased reliance on fossil fuels and decreased reliance on renewable energy sources because total energy use would decrease, fossil fuel energy consumption would decrease, and renewable energy consumption would increase. Therefore, this impact (EN-2) is less than significant in 2025, 2035, and 2050.
The Plan’s impacts related to reliance on fossil fuels and renewable energy sources, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans and other cumulative projects would not cause a significant cumulative impact. Therefore, the Plan’s incremental impacts related to reliance of fossil fuels and renewable energy sources (EN-2) are not cumulatively considerable in 2025, 2035, and 2050.

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

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

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

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

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

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

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

Regarding cumulative impacts, the Plan’s impacts related geologic hazards, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the Plan’s incremental impacts related to expansive soils or expose a greater number of structures to
risks from unstable soils, including landslides, lateral spreading, subsidence, liquefaction, or collapse, or cause soils to become unstable (GEO-2) are not cumulatively considerable in 2025, 2035, and 2050.

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

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

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

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

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

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

**F. GREENHOUSE GAS EMISSIONS (EIR SECTION 4.8)**

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

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

Regarding cumulative impacts, the Plan’s impacts related to increases in GHG emissions compared to existing conditions (2016), in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because the Plan’s
GHG emissions would decrease compared to 2016 levels. Therefore, the Plan’s incremental impacts related to direct or indirect increases in GHG emissions compared to existing conditions (2012) (GHG-1) are not cumulatively considerable in 2025, 2035, and 2050.

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

The SANDAG Board of Directors finds that implementation of the proposed Plan would not conflict with Senate Bill (SB) 375 emission reduction targets for 2035 because it would result in a 20 percent reduction in per capita CO₂ emissions from passenger cars and light-duty trucks from 2005 levels by 2035, which exceeds the 2035 target of a 19 percent reduction for the SANDAG region. Therefore, this impact (GHG-2) is less than significant in 2035.

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

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

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

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

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

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

Regarding cumulative impacts, the Plan’s impacts related to conflicts with local plans, in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because there are no Plan conflicts with adopted CAPs, GHG reduction plans, and/or sustainability plans. Therefore, the Plan’s incremental impacts related to conflicts with local plans adopted for the purpose of reducing GHG emissions (GHG-4) are not cumulatively considerable in 2025, 2035, and 2050.
G. HAZARDS AND HAZARDOUS MATERIALS (EIR SECTION 4.9)

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

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

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

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

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

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

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

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

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

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

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

Regarding cumulative impacts, the Plan’s impacts related to impeding implementation of an adopted emergency response plan or emergency evacuation plan or resulting in inadequate emergency access, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause significant cumulative impacts. Therefore, the Plan’s incremental impacts related to impeding implementation of an adopted emergency response plan or emergency evacuation plan or resulting in inadequate emergency access (HAZ-4) are not cumulatively considerable in 2025, 2035, and 2050.
H. HYDROLOGY AND WATER QUALITY (EIR SECTION 4.10)

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

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

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

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

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

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

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

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

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

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

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

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

I. LAND USE (EIR SECTION 4.11)

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

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

Regarding cumulative impacts, the Plan’s impacts related to conflicting with the land use portion of adopted local general plans or other applicable land use plans, including specific plans and community plans adopted for the purpose of avoiding or mitigating an environmental effect, in combination with similar impacts that would result in the southern California region based on projections in adopted plans would not create significant cumulative impacts because the Plan would create no such conflicts. Therefore, the Plan’s incremental impacts related to conflicting with
the land use portion of adopted local general plans or other applicable land use plans (LU-2) are not cumulatively considerable in 2025, 2035, and 2050.

J. NOISE AND VIBRATION (EIR SECTION 4.13)

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

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

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

K. TRANSPORTATION (EIR SECTION 4.16)

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

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

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

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

The SANDAG Board of Directors finds that implementation of the proposed Plan would not change the applicable design standards of the implementing agencies, and the transportation network improvements would be designed consistent with those standards. Further, the proposed Plan includes several planning efforts that would improve transportation safety. Therefore, this impact (TRA-3) is less than significant in 2025, 2035, and 2050.
Regarding cumulative impacts, the impacts related to substantially increasing hazards due to a design feature or incompatible use would not create significant cumulative impacts. Other adopted plans and related projects did not identify an impact related to increased hazards. Therefore, the proposed Plan’s less-than-significant transportation impacts associated with substantially increasing hazards due to a design feature or incompatible use (TRA-3) are not cumulatively considerable in 2025, 2035, and 2050.

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

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

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

**IV. FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS**

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

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

- Aesthetics and Visual Resources
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, and Paleontological Resources
- Greenhouse Gas Emissions
- Land Use
- Mineral Resources
- Noise and Vibration
- Population and Housing
- Public Services and Utilities
- Transportation
- Tribal Cultural Resources
- Water Supply
- Wildfire
A. AESTHETICS AND VISUAL RESOURCES (EIR SECTION 4.1)

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

Significant Impact

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

Mitigation Measures

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

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

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

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

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

Findings and Rationale

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

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

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

**Significant Impact**

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

**Mitigation Measures**

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

**AES-2a Reduce Impacts on Scenic Resources Within a State Scenic Highway and Local Scenic Resources for Transportation Network Improvements.** During planning, design, and project-level CEQA review of transportation network improvements within eligible or designated state scenic highways and local scenic resources, SANDAG shall, and other transportation project sponsors can and should, ensure that projects are designed to minimize damage to scenic resources.
The following measures would reduce the significant effects related to damage of scenic resources within a state scenic highway or other scenic resource or a local scenic route that are in the jurisdiction and responsibility of California Department of Transportation (Caltrans) or other public agencies. Where a project has the potential for significant effects, mitigation measures shall ensure compliance with regulations for Caltrans scenic vistas, requirements of the Coastal Act, and policies within county and city general plans. Such measures may include the following:

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

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

- Avoid damaging, moving, or removing trees, rock outcroppings, historic structures, and other scenic resources from eligible or designated state scenic highway corridors and local scenic resources and public viewsheds, where those scenic resources are relevant to the designation or eligibility for designation as a state scenic highway or are identified as a protected visual resource in local plans. For projects within or adjacent to designated or eligible state scenic highway corridors, and local scenic resources and public viewsheds identified in local approved plans, prior to project approval, complete visual resources studies. If a significant impact on scenic resources is identified, the study would require site-specific mitigation measures, which may include those identified below.
- Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, and site grading.
- Ensure vegetation used as screening and landscaping blends in and complements the natural landscape.
• Retain or replace trees within scenic resources so that clear-cutting is not evident.
• Ensure grading blends with the adjacent landforms and topography.
• Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.

Findings and Rationale

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

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

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

Significant Impact

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

Mitigation Measures

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

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

• Revegetate graded slopes and exposed earth surfaces prior to completion of construction.

• Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.

• Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements the surrounding landscape and development. Break up large barrier façades using techniques that include, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades.

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

• Use contour grading to match surrounding terrain and existing natural, and man-made features of the area.

• Revegetate graded slopes and exposed earth surfaces prior to completion of construction.

• Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements the surrounding landscape and development. Break up large barrier façades using techniques that include, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades.

• Apply development standards and design guidelines to maintain compatibility with surrounding development, including site coverage, building height and massing, building materials and color, landscaping, and site grading.

Findings and Rationale

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

Implementation of mitigation measures AES-3a, AES-3b, AES-2a, AES-2b, and AES-1a would reduce this significant impact of substantial degradation of visual character. However, while these mitigation measures reduce changes in visual character, it would be infeasible to prevent all instances of substantial degradation of visual character caused by regional growth and land use change as well as transportation network improvements. It cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures
or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-3) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

- Minimize and control glare from transportation projects through the adoption of project design features that reduce glare, such as those listed below:
  - Planting trees along transportation corridors to reduce glare from the sun.
  - Landscaping off-street parking areas, loading areas, and service areas.
  - Limiting the use of reflective materials, such as metal.
  - Using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry.
  - Screening parking areas by using vegetation or trees.
  - Using low-reflective glass.

- Impose lighting standards that ensure that minimum safety and security needs are addressed and minimize light trespass and glare associated with transportation network improvements. These standards include the following:
  - Minimizing incidental spillover of light onto adjacent private properties and undeveloped open space.
  - Directing luminaries away from habitat and open space areas adjacent to the project site.
  - Installing luminaries that provide good color rendering and natural light qualities.
Minimizing the potential for back scatter into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.

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

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

Findings and Rationale

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

Implementation of mitigation measures AES-4a and AES-4b would reduce significant impacts associated with the introduction of new light and glare sources. However, while these mitigation measures reduce light and impacts, it would be infeasible to prevent all instances of new light and glare sources caused by regional growth and land use change as well as transportation network improvements, particularly from additional light sources from vehicle headlights at night. It cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-4) remains significant and unavoidable.
Cumulative Aesthetics and Visual Resources Impacts (EIR Section 5.2.1)

Significant Impacts

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

Mitigation Measures

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

Findings and Rationale

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

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

B. AGRICULTURE AND FOREST RESOURCES (EIR SECTION 4.2)

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

Significant Impact

Implementation of forecasted regional growth and land use change would convert the following amounts of existing agricultural land to nonagricultural uses: about 6,401 acres from 2016 to 2025 (including about 709 acres of FMMP-designated lands), about 7,125 acres from 2026 to 2035 (including about 760 acres of FMMP-designated lands), and about 7,586 acres from 2036 to 2050 (including about 760 acres of FMMP-designated lands (EIR Tables 4.2-3, 4.2-5, 4.2-7). Implementation of planned transportation network improvements would convert the following amounts of existing agricultural land to nonagricultural uses: about 57 acres from 2016 to 2025 (this
impact does not affect FMMP-designated lands), about 138 acres from 2026 to 2035 (including about 7 acres of FMMP-designated lands), and about 601 acres from 2036 to 2050 (including about 9 acres of FMMP-designated lands) (EIR Tables 4.2-4, 4.2-6, and 4.2-8). In addition, forecasted regional growth and land use change near existing agricultural lands would indirectly decrease the viability of agricultural production on those lands in 2025, 2035, and 2050.

**Mitigation Measures**

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

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

- Acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same city or community in which the conversion occurs. Where conversion occurs within the Coastal Zone, locate the easement within the Coastal Zone, if feasible.

- If a project requires cancellation of a Williamson Act contract, acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same city or community in which the cancellation occurs. Where the cancellation occurs within the Coastal Zone, locate the easement within the Coastal Zone, if feasible.

- Where agricultural conservation easements are acquired or dedicated, consider the suitability of a specific proposed easement on its ability to avoid or reduce fragmentation of agricultural land to enhance overall production value and operation viability.

- Where project-specific mitigation described above is not feasible, use other commensurate solutions, such as payment of an agricultural resource impact fee made pursuant to an approved in-lieu fee program.

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

- Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, topographic features, and open space, and to reduce conflict between transportation network improvements and/or developments and farming.

- Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.

- Align corridors, incorporate buffer zones and setbacks, and design berms and fencing to avoid agricultural lands and to reduce conflicts between transportation projects and agricultural lands.
Findings and Rationale

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

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

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

**Significant Impact**

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

**Mitigation Measures**

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

**Findings and Rationale**

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

Implementation of mitigation measures AG-1a and AG-1b would reduce significant impacts related to conflicts with existing zoning for agricultural use and Williamson Act contract lands. However, it
cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AG-2) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measure**

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

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

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

**Findings and Rationale**

The SANDAG Board of Directors finds that the provisions of mitigation measure FR-1a have been required in, or incorporated into, the Plan to reduce this significant impact of loss of forest lands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.
Implementation of mitigation measure FR-1a, BIO-1a, BIO-1b, and BIO-1e would reduce significant impacts related to loss of forest lands. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (FR-1) remains significant and unavoidable.

Cumulative Agriculture and Forest Resources Impacts (EIR Section 5.2.2)

Significant Impacts

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

Mitigation Measures

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

Findings and Rationale

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

Implementation of mitigation measures AG-1a, AG-1b, and FR-1, as well as BIO-1a, BIO-1b, and BIO-1e, would reduce the Plan’s significant cumulative agriculture and forest resources impacts. However, while these mitigation measures reduce the Plan’s significant agriculture and forest resources impacts, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan’s incremental contributions to cumulatively significant agriculture and forest resources impacts to less-than-significant levels, these impacts (AG-1, AG-2, and FR-1) remain cumulatively considerable post-mitigation.
C. AIR QUALITY (EIR SECTION 4.3)

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

Significant Impact

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

Mitigation Measures

2050

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

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

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

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

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

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, AQ-2b, GHG-5a, GHG-5b, GHG-5d, GHG-5f, and TRA-2 have been required in, or incorporated into, the Plan to reduce PM10 and SOx. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG’s responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.
Implementation of mitigation measures GHG-5a, GHG-5b, GHG-5d, and GHG-5f would reduce PM10 and PM2.5 emissions from tire wear, break wear, and vehicle exhaust. In addition, mitigation measure TRA-2 would reduce criteria pollutants through project-level VMT reduction measures. Implementation of mitigation measure AQ-2a would reduce PM10 and SO\textsubscript{X} emissions from onroad sources by securing funding to implement ways to reduce all emissions, including PM10 and SO\textsubscript{X} emissions from mobile sources. Implementation of mitigation measure AQ-2b would reduce exhaust PM10 and SO\textsubscript{X} emissions from commuter trains by replacing diesel fuel combustion with zero-emission energy sources. Mitigation measure AQ-2b would reduce SO\textsubscript{X} emissions so that they would be less than cumulatively considerable, and therefore less than significant.

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

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

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

- Use fugitive dust control measures to reduce generation from exposed surfaces during construction, as specified in SDAPCD Rule 55 (SDAPCD 2009). SDAPCD Rule 55 includes
various requirements, including preventing visible dust beyond the property line for more than 3 minutes in any 60-minute period, applying dust suppressants, removing all track-out/carry-out dust at the conclusion of each work day Compliance with these regulatory requirements is a performance standard for mitigation of construction activity particulate emissions. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out to 90 percent for use of tarps or cargo covering when transporting material (SCAQMD 2007, WRAP 2006).

- Use additional fugitive dust control measures such as watering or application of dust suppressants to reduce the generation of fugitive dust at active construction sites. Reductions in fugitive dust emissions range from 10 to 74 percent for watering of unpaved surfaces to 84 percent for use of dust suppressants (WRAP 2006).

- Implement controls on haul trucks to reduce emissions from haul trucks transporting soil, sand, or other loose material off site. Reductions in fugitive dust emissions are estimated at 91 percent for use of tarps or cargo covering when transporting material (SCAQMD 2007).

- Remove visible mud or dirt track-out onto adjacent public roads. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out (WRAP 2006).

- Limit vehicle speeds on unpaved surfaces during construction to 15 mph. Reductions in fugitive dust emissions from unpaved surfaces are estimated at 57 percent (WRAP 2006).

- Suspend excavation, grading, and/or demolition activities when average wind speeds exceed 20 mph. Reductions in fugitive dust emissions are estimated at 98 percent (WRAP 2006).

- Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas. Reductions in fugitive dust emissions from wind erosion are estimated at 90 percent (WRAP 2006).

- Monitor idling time of diesel-powered construction equipment and limit to no more than 2 minutes.

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

- Ensure off-road equipment greater than 25 horsepower (hp) that will be operating for more than 20 hours during construction meets the following requirements:
  - Ensure engines are zero emissions or equipped with an CARB Level 3 Verified Diesel Emissions Control Strategy, if available for the equipment being used, unless the equipment meets EPA Tier 4 emission standards.
  - If project-specific analysis demonstrates that the above measure would not adequately reduce impacts (as determined by the project-level lead agency), provide engines that meet or exceed either EPA Tier 4 off-road standards.

- Monitor idling time of diesel-powered construction equipment and limit to no more than 2 minutes.
• Maintain and properly tune construction equipment in accordance with the manufacturers’ specifications.
• Prohibit portable diesel generators and use grid power when it is available. Use propane or natural gas generators when grid power electricity is not feasible.
• Use late model engines.
• Use low emission diesel products.
• Use alternative fuels in construction equipment.
• Use engine retrofit technology to control emissions from off-road equipment.

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

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

Findings and Rationale

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

Mitigation measure AQ-3a would reduce the impacts associated with fugitive dust (fugitive PM10 and PM2.5 emissions) during construction, as well as the impacts associated with exhaust emissions from construction equipment. Mitigation measure AQ-3b would reduce the impacts associated with exhaust emissions from construction equipment. Mitigation measure AQ-3c would reduce diesel emissions during construction from on-road vehicles. Additionally, mitigation measures GHG-5e and GHG-5f would reduce construction emissions through use of energy and fuel-efficient vehicle and equipment. Although mitigation would reduce impacts, there is no
guarantee that all projects’ impacts would be reduced to below a level of significance; thus, impacts would be significant and unavoidable. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-3) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

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

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

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

In addition, the following measure is proposed:

**AQ-4 Reduce Exposure to Localized Particulate Emissions.** During planning, design, and project-level CEQA review of transportation network improvements and programs, and during planning, design, and project-level CEQA review of development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential particulate matter concentration impacts of the project using
applicable procedures and guidelines for such analyses. If exceedances of PM10 or PM2.5 standards are predicted, SANDAG shall, and other transportation project sponsors can and should, apply measures to reduce PM emissions, including but not limited to the following:

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

Where adequate buffer cannot be implemented, implement the following:

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

Findings and Rationale

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

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

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible
mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-4) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

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

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

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

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

In addition, the following measures are proposed:

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

In addition, during planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should apply the above measures, and additional measures to reduce TAC emissions or exposure to TAC emissions, including but not limited to:
• Reduce the potential for TACs to be introduced into buildings by all of the following:
  o Maintaining a positive air pressure within buildings that include sensitive receptors.
  o Achieving a performance standard of at least one air exchange per hour of fresh outside filtered air.
  o Achieving a performance standard of at least 4 air exchanges per hour of recirculation.
  o Achieving a performance standard of at least 0.25 air exchanges per hour of unfiltered air if the building is not positively pressurized.
• Within developments, separate sensitive receptors from truck activity areas, such as loading docks and delivery areas. This measure would reduce exposure of residents and other sensitive receptors by locating sources of TACs associated with loading docks and delivery areas away from sensitive receptors.
• Replace or retrofit existing diesel generators that are not equipped to meet CARB’s Tier 4 emission standards.
• Reduce emissions from diesel trucks using the project site through the following measures:
  o Install electrical hook-ups for electric or hybrid trucks at loading docks.
  o Require trucks to use Transportation Refrigeration Units (TRUs) that meet Tier 4 emission standards.
  o Require truck-intensive projects to use advanced exhaust technology (e.g., hybrid) or alternative fuels.
  o Prohibit trucks from idling for more than 2 minutes as feasible.
This measure would reduce emissions of TACs from trucks and TRUs by reducing operations and requiring them to use electrical hookups.
• Do not locate sensitive receptors in the same buildings as a perchloroethylene dry cleaning facility. This measure would reduce potential exposure of sensitive receptors to perchloroethylene from dry cleaning facilities.
• Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year). This measure would reduce potential exposure of sensitive receptors to emissions from gas stations.
• Ensure that private (individual and common) exterior open space, including playgrounds, patios, and decks, is shielded from stationary sources of air pollution by buildings or otherwise buffered to further reduce air pollution exposure for project occupants. This measure would reduce the potential for exposure of residents and other sensitive populations to stationary sources of TAC emissions.

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

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

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

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

Cumulative Air Quality Impacts (EIR Section 5.2.3)

Significant Impacts

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

Mitigation Measures

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

Findings and Rationale

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

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

D. BIOLOGICAL RESOURCES (EIR SECTION 4.4)

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

- Limit grading and earth-moving activities to the permitted impact footprint. Install environmentally sensitive area fencing or flagging along the limits of disturbance prior to the start of construction to avoid incidental loss of sensitive habitat types.

- Require biological monitoring and regular inspections for construction in the vicinity of and adjacent to sensitive habitats to avoid impacts on these habitats. Report any special status species and natural communities detected during project surveys to the CNDDB.

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

**Sensitive Vegetation Communities**

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

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

- Onsite restoration and post-restoration monitoring for temporary impacts using appropriate native species and natural habitat configurations similar to or better than those impacted.

- On- or offsite preservation of existing habitats through acquisition and/or restoration using Environmental Mitigation Program (EMP) and other (e.g., project-specific) mitigation funds for permanent impacts. Protect mitigation lands in perpetuity (e.g., through a conservation easement or similar legal conservation assurance to be approved by the regulatory agencies), fund long-term management (e.g., through the establishment of an endowment
for habitat management and for easement management), and adequately manage such lands to maintain the originally intended biological quality and function in perpetuity.

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

- Purchase of habitat credits at an approved mitigation bank, or through payment into an in-lieu mitigation fee program applicable to the impacts and as approved by the Wildlife Agencies.

**Regulated Aquatic Resources**

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

- Purchase of credits at an existing authorized mitigation bank or in lieu fee program, except within the coastal zone. Provide compensatory mitigation for impacts inside the coastal zone at sites within the coastal zone close to the impact. Mitigation of impacts on aquatic resources within the coastal zone may require offsets outside the coastal zone and would be negotiated with the CCC on a case-by-case basis.

- Project-specific (permittee responsible) mitigation. Apply an appropriate mitigation ratio for regulated aquatic resources in consultation with the regulatory agencies (i.e., following the USACE Standard Operating Procedure and any other applicable standards) to ensure no net loss of wetlands functions and services, account for temporal losses, and set in coordination with USACE, RWQCB and CDFW. Impacts on vernal pools within the City of San Diego would require mitigation consistent with the Vernal Pool Habitat Conservation Plan (VPHCP) (City of San Diego 2017); impacts on vernal pools outside the City of San Diego would require permitting through the RWQCB.

**BIO-1c Prepare a Habitat Restoration Plan.** During planning, design, and project-level CEQA review of transportation network improvements or development projects, and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—as specified through consultation with and as approved by the resource agencies, and consistent with adopted Multiple Species Conservation Program (MSCP) or Multiple Habitat Conservation Program (MHCP) guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a habitat restoration plan for impacts on sensitive natural communities or a Habitat Mitigation and Monitoring Plan (HMMP) consistent with the requirements of and approved by USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands. This mitigation measure applies
provided that mitigation does not occur through credit purchase at a mitigation bank. The restoration plan should include the following:

- Details regarding the location of the site, site conditions and functions, site preparation (e.g., grading, bio-engineering methods), recontouring, planting specifications (including native seed mixes and plant palettes), irrigation design (if determined necessary), and measures to control exotic vegetation.

- Details on avoidance of impacts on any extant sensitive biological resources that may occur as the result of habitat restoration, including direct loss and indirect effects related to changes in hydrology and associated potential effects on species composition.

- Identification of locally appropriate plant species for the plan, sourcing (e.g., seed collection, contract-growing of container plants), and outline of performance standards (success criteria). Success should be measured by comparing a similar, natural (undisturbed) reference site containing the same vegetation communities and located within the same watershed as the restoration site, and should use statistical metrics in consideration of the temporal difference between an established reference site and an immature restoration site.

- Performance standards sufficient to create self-sustaining habitat providing the functions and values required to offset those lost to the impacts and meet the requirements of applicable agency and adopted plans, ordinances, and policies. After final performance standards have been met and any relevant permitting agencies have approved the mitigation project as complete, the mitigation areas must be conserved and managed in perpetuity (see BIO-1d).

- Maintenance and monitoring procedures (including post-restoration monitoring and reporting). Any habitat restoration and mitigation site should be monitored for a minimum of 5 years or as required by regulatory agencies, but continue maintenance and monitoring until performance standards are met.

- Identification of remedial measures if the mitigation efforts fall short of the performance standards. Remedial measures typically include, but are not limited to, replanting, reseeding, topographical/surface contour adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods.

- Climate science and climate change resiliency and adaptation measures, to be developed as adaptive management strategies for restoration and long-term management planning to reflect the latest available information on climate change impacts and adaptation measures, such as seed storage and adaptation of the seed mixes and planting palettes to adapt to changing climate conditions and sea-level rise.

**BIO-1d Prepare Habitat/Long-Term Management Plans.** During project-level CEQA review of transportation network improvements or development projects and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions should—as specified through consultation with and approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a Long-Term Management Plan (LTMP) consistent with the requirements of USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands; or a Habitat Management Plan (HMP) or Resources Management Plan (RMP) for upland mitigation areas. The management plans can and should be consistent with the SDMMP Management Strategic Plan (SDMMP 2017), be prepared by qualified and experienced ecologists to develop appropriate management and monitoring measures, describe management in perpetuity of the mitigation and conservation areas, illustrate adaptive management measures (Atkinson et al. 2004), outline management goals and objectives, and identify management tasks pursuant to these goals and objectives. Management
goals should include adaptive management measures for climate adaptation and resiliency. Furthermore, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, prepare a management cost analysis to identify long-term management costs pursuant to measures outlined in the LTMP, HMP, or RMP. Long-term management should be funded using endowments or other financial assurances to generate sufficient annual interest to manage mitigation areas in perpetuity. In addition to the funding requirements, the management plans should also identify the habitat manager and propose a site protection instrument, such as an agency-approved Conservation Easement (CE), restrictive covenant or other title restriction that identifies the mitigation site to be conserved in perpetuity. In some cases, compensatory mitigation would occur through adding lands through public lands that are already preserved (e.g., National Wildlife Refuge).

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

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

**Findings and Rationale**

The SANDAG Board of Directors finds that the provisions of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial adverse effects on riparian habitat, wetlands, and uplands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG’s responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies. Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e would reduce significant impacts related to substantial adverse effects on riparian habitat, wetlands, and uplands. However, there is no assurance that these mitigation measures would be implemented by non-SANDAG project sponsors or would be equally effective for all projects due to the wide variety of circumstances, such as lack of available mitigation sites, shortage of acreage at mitigation banks, mitigation complexity and cost, lack of long-term management and monitoring, and lack of enforcement. Instances may occur in which impacts are not reduced to less than significant.
The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (BIO-1) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

**Construction**

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

- Avoid construction during the nesting or breeding season of special-status animal species.
- If the nesting or breeding season cannot be avoided, conduct focused surveys (by certified biologists approved by the Wildlife Agencies) and implement noise attenuation measures (e.g., temporary noise barriers) if construction noise levels are found by the focused survey to disturb special-status animal species, specifically during the breeding season.
- Backfill all wildlife pitfalls (trenches, bores, and other excavations) at the end of each work day. If backfilling is not feasible, slope all trenches, bores, and other excavations at a 3:1 ratio at the ends to provide wildlife escape ramps, or cover completely to prevent wildlife access.
- Delineate permitted work areas, including staging areas, equipment access, and placement of soils, with fencing or stakes prior to construction to prevent access to areas occupied by special-status species.
• Require monitoring of construction activities by qualified or certified biologists when construction occurs in, or adjacent to (i.e., within buffer areas approved by the regulatory agencies), areas suitable for or occupied by special-status species, with authority to stop work if it deviates from approved plans and mitigation measures. Avoidance buffers may vary by species and should be approved by the Wildlife Agencies.

• Avoid nighttime construction or minimize lighting. When activities must occur at night, direct lighting (e.g., staging areas, equipment storage sites, roadway) downward and away from sensitive vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.

• Remove spoils, trash, or any debris to an offsite, approved disposal facility. Contain trash and food items in closed containers and remove daily to reduce the attractiveness to opportunistic predators such as coyotes and feral dogs and cats that may prey on sensitive species. Prohibit workers from bringing pets and firearms to the site.

• Clear vegetation outside of the typical breeding season of special-status animal species as determined by the Wildlife Agencies or qualified biologist. If activities must occur during special-status species breeding season timeframes, conduct a preconstruction survey by a qualified biologist to determine whether the species of concern, including special-status birds protected under the Migratory Bird Treaty Act (MBTA), are present within the proposed work area or appropriate buffer (buffer distance may vary depending on the type of activity and the species and other site conditions). If the species of concern are found on site, implement measures, surveys, and construction monitoring to avoid impacts as determined by the regulatory agencies and/or the qualified biologist.

Operation and Maintenance

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

• If permanent lighting is necessary, use motion sensitive lighting rather than steady burning, and direct downward and away from natural vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.

• In the event that vegetation clearing or other vegetation maintenance is required, schedule vegetation clearing outside special-status animal species breeding seasons.

• Implement operational noise reduction measures described in Section 4.13 (see mitigation measure NOI-1a).

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

Federally and/or State-Listed Plant Species

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

- Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts.

- Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat, including, but not limited to, seed collection, salvage of root masses, translocation of transplantation of populations or plant parts, and planting seeds and/or root masses in an area with suitable conditions as approved by the Wildlife Agencies or authorized jurisdiction. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.

- Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.

- Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, replanting and reseeding of appropriate habitat elements, and propagation and seed bulking programs.

- Conserve any restoration and translocation sites in perpetuity, fund a long-term management endowment, identify a long-term habitat manager, and provide long-term adaptive habitat management measures through a Habitat Management Plan.

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

- For plant species covered by adopted NCCPs or other ordinances such as the San Diego County RPO, obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances. This may include species-specific mitigation for covered narrow endemic plant species pursuant to MSCP or MHCP requirements.

- Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, translocation/transplantation, restoration, or creation of self-sustaining suitable habitat as described above for federally and state-listed species. Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.

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

**Federally and/or State Listed Animal Species**
If an individual project would result in take of a federally and/or state-listed animal species, consult with the Wildlife Agencies and/or require the project applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, Section 7, NCCP, HCP) prior to construction as required by State and federal law. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines. As identified through the appropriate take authorizations, develop mitigation plans and long-term conservation and management strategies, as required and approved by the Wildlife Agencies.

Mitigate loss of habitat through open space conservation, using mitigation banks (as available) or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat following the most recent scientific information and guidance available.

Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted NCCP plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts.

Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat based on available scientific information and as recommended by the respective species experts. If appropriate and approved by the regulatory agencies, mitigation may include translocation (active or passive) of the species. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.

Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.

Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, habitat restoration, and predator control programs.

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

Obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances (such as the County RPO).

Follow guidelines that identify mitigation requirements, such as local biology guidelines and mitigation ordinances, or Memoranda of Understanding (MOU) between the respective jurisdiction and Wildlife Agencies.

Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat. Create species-specific breeding opportunities and protect mitigation areas from edge effects (e.g., roadkill). Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.
Findings and Rationale

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

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

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

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

Significant Impact

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

Mitigation Measure

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

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

• Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands.

• Where feasible, prohibit night-time trail use, implement seasonal trail closures, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.

• As feasible, within 200 feet of a wildlife corridor, use non-reflective glass or glass treated with non-reflective coating for all exterior windows and building surfaces.

• Use only native species for landscaping within at least 200 feet of identified wildlife corridors.

• Incorporate dimmed, shielded, and directed lighting in areas near corridors that only illuminate the project site; consider high pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors.

• Include permanent noise barriers and sound-attenuating features as part of the project design, and incorporate temporary noise barriers and noise-reduction devices on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.

• Install physical barriers (e.g., wildlife fencing) that prevent human and/or domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials (i.e., rubberized asphalt), and traffic calming measures.

• Minimize the number of road crossings through identified wildlife corridors.

• Incorporate the appropriate wildlife crossing infrastructure into project design. Wildlife crossing infrastructure will be designed following the latest scientific information, and should include upgrading existing culverts to facilitate functional wildlife movement, installing crossing and directional fencing at roadkill hotspots, installing wildlife bridges or undercrossing, and managing in perpetuity both sides of the wildlife crossings. Construct or retrofit with features such as open span bridges instead of closed culverts to allow for wildlife movement under linear transportation corridors.

• If the construction of or retrofitting with wildlife bridges is infeasible, incorporate undercrossings and/or other crossing structures that use scientifically accepted openness ratios to allow for continued movement of wildlife where transportation facilities create barriers to wildlife movement and use of nursery sites. Evaluate size-class-specific crossing structures and movement enhancement features (e.g. habitat refugia within structure, soft bottom undercrossings) for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, create passable aquatic barriers for migratory fish species in order to provide fish access to spawning and rearing habitats.

• Maintain undercrossings and/or other crossing structures as needed to ensure wildlife movement. Prepare a fencing and wildlife crossing structure maintenance plan for projects with edge effects to maintain permeability for wildlife across corridors.
• Install directional fencing, where appropriate, to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or other crossing structures. Where fencing stops, extend the fence and angle it away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, use one-way gates or jump-outs so animals that do get around fence end runs can safely exit roadways.

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

Findings and Rationale

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

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

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

Cumulative Biological Resources Impacts (EIR Section 5.2.4)

Significant Impacts

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

Mitigation Measures

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

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

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

E. CULTURAL RESOURCES (EIR SECTION 4.5)

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

Significant Impact

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

Mitigation Measures

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

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

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

Historic Architectural Resources

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

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

- Require areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor if needed.
- Should an archaeological deposit and/or feature be encountered during construction activities that is determined to be a historical resource or unique archaeological resource by a qualified archaeologist, stop ground-disturbing activities and prepare and/or implement an Archaeological Data Recovery Program (ADRP) in consultation with SHPO and/or, when applicable, qualified local agency staff with technical expertise in archaeological and cultural resources management.
- Integrate curation of archaeological and/or historical artifacts and associated records in a regional center focused on the care, management, and use of archaeological collections if the artifact must be excavated. This does not include Native American human remains and
associated burial items, the disposition of which should be determined in consultation with the Most Likely Descendants (MLDs) (see Impact CULT-2).

Findings and Rationale

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

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

**Cumulative Cultural Impacts (EIR Section 5.2.5)**

**Significant Impacts**

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

**Mitigation Measures**

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

**Findings and Rationale**

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

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

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

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

**Significant Impact**

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

**Mitigation Measures**

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

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

**PALEO-1b Avoid or Reduce Impacts on Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements.** If it is determined during planning, design, and project-level CEQA review that transportation network improvements or development projects would be located within an area that likely contains unique paleontological resources or unique geologic features (based on results of the work done in mitigation measure PALEO-1a), SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid or reduce impacts on these resources when feasible. If impacts cannot be avoided, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, retain a qualified paleontologist prior to construction to:
• Prepare a paleontological monitoring and mitigation plan, which will outline where monitoring should occur and procedures for discoveries, consistent with applicable regulations and guidelines. Such regulatory standards include the Antiquities Act of 1906, Paleontological Resources Preservation Act (PRPA), and Public Resources Code requirements; regional and local policies of San Diego County and the cities of Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, Escondido, La Mesa, Lemon Grove, National City, Oceanside, San Diego, San Marcos, Santee, Solana Beach, and Vista; and guidelines of other transportation project sponsors such as the California Department of Transportation’s Standard Environmental Reference, Environmental Handbook: Volume 1: Guidance for Compliance, Chapter 8: Paleontology (Caltrans 2014).

• Establish procedures for monitoring and the possible preconstruction salvage of exposed unique resources if fossil-bearing rocks or unique geologic features have the potential to be affected.

• Provide preconstruction coordination with contractors.

• Be on site to observe during grading operations and oversee original cutting in previously undisturbed areas of sensitive geologic formations, temporarily halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, recover scientifically valuable specimens or ensure avoidance of the unique paleontological resource or unique geologic feature, and oversee fossil salvage operations and reporting.

Findings and Rationale

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

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

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

Significant Impact

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

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

Findings and Rationale

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

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

G. GREENHOUSE GAS EMISSIONS (EIR SECTION 4.8)

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

Significant Impact

Because total GHG emissions in the San Diego region of 20.3 million metric tons (MMT) carbon dioxide equivalent (CO₂e) in 2030 would exceed the regional 2030 GHG reference point of 15.6 MMT CO₂e (which is based on SB 32 targets for 2030), and total emissions in the San Diego region would exceed the 2045 and 2050 reference points of net zero and 5.2 MMT CO₂e, respectively (which is based on the goals of EO B-55-18 and S-3-05), the proposed Plan's 2035, 2045 and 2050 GHG emissions would be inconsistent with the state’s ability to achieve the goals of SB 32, EO B-55-18, and S-3-05.

Mitigation Measures

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

• Mitigation measures for transportation network improvements and programs, which SANDAG has committed to implement for its projects and which other transportation project sponsors can and should implement for their projects.

• Mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions can and should implement.

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

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

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

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

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

The new and/or revised grant program(s) shall: (1) achieve additional annual GHG emissions reductions during the proposed Plan horizon by implementing projects that would not otherwise occur due to insufficient funding, and (2) achieve additional cumulative GHG emissions reductions under the proposed Plan planning horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Reducing total annual and cumulative GHG emissions under the proposed Plan planning horizon would reduce the proposed Plan’s contribution to climate change.
To be eligible for grant funding, local jurisdictions would be required to have a CAP or GHG reduction plan adopted by the agency’s elected decision-making body. Applicants shall provide sufficient evidence in their funding proposals demonstrating, to SANDAG’s satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding. Applications shall include estimated GHG emissions reductions from the project, which shall be prepared using established methods or protocols and shall be reviewed and approved by SANDAG. The grant program(s) shall be structured (e.g., using evaluation criteria and/or weighting of evaluation criteria) to prioritize the allocation of funds to projects based on the amount of measurable progress they achieve towards achieving the GHG emissions reductions targets identified in that jurisdiction’s adopted CAP or GHG reduction plan.

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

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

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

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

Eligible entities could include but are not limited to public transit operators for zero-emission bus and infrastructure funding; port tenants, distributors, wholesalers, warehouse developers and/or owners, truck owners and/or operators, truck manufacturers, infrastructure providers, and any company that has a fleet of medium- and/or heavy-duty trucks for zero-emission goods movement
funding; and local residents, last mile delivery services, and ride-share and/or ride-hail services for electric micromobility funding and associated infrastructure.

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

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

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

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

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

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

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

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

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

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

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

Project-Level Mitigation

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

- Implement sustainable construction measures through construction bid specifications, including the following:
o Use energy and fuel-efficient vehicles and equipment and/or use alternative fuel vehicles and equipment, where applicable.
o Use lighting systems that are energy efficient, including light-emitting diode (LED) technology.
o Use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements.
o Recycle 50–75 percent of construction and demolition waste.

- Install efficient lighting (including LEDs) for traffic, street, and other outdoor lighting.
- Incorporate infrastructure electrification into project design (e.g., EV charging; charging for electric bikes) above minimum code requirements.
- Plan, design and construct all new, upgraded, and regularly maintained infrastructure with electricity demand shall demonstrate how such infrastructure will achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.
- Incorporate and increase electric vehicle charging equipment and preferred EV parking spots into projects that include commuter parking areas.
- Include design measures (e.g., curb management strategies) to accommodate flexible fleets.
- Install solar photovoltaic canopies over parking areas.
- Design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- Design measures to reduce water consumption, such as drought-resistant landscaping, smart irrigation systems, and other measures, including those listed in mitigation measures WS-1a and WS-1b in Section 4.18, Water Supply.
- Construct buildings to Leadership in Energy and Environmental Design (LEED) certified standards or equivalent standards.
- Funding for those measures that SANDAG selects would be included in individual project budgets.

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

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

o Providing transit incentives, including transit passes for Metropolitan/North County Transit District buses and trolleys.

o Consistent with the Regional Bike Plan, incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network.

o Implementing Complete Streets consistent with the SANDAG Regional Complete Streets Policy, including adopting local Complete Streets policies.

o Implementing Mobility Hubs consistent with the Regional Mobility Hub Strategy.

o Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.

o Implementing measures to increase transit use through service frequency and affordability as identified through community engagement activities, including but not limited to input from local residents, stakeholders, and Community-Based Organizations.

o Building low stress bicycle networks including bike trails and connections, lanes, paring, and end of trip facilities.

o Subsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets.

o Implementing employer trip reduction measures to reduce employee trips and VMT such as vanpool and carpool programs, providing end-of-trip facilities, telecommuting, teleconferencing, and alternative work schedule programs.

o Incorporating ride hailing and autonomous vehicle innovations.

o Including design measures (e.g., curb management strategies) to accommodate flexible fleets.

o Implementing a school bus program in areas currently not served by school buses.

- Measures that reduce VMT through parking strategies based on the SANDAG Regional Parking Management Toolbox, including the following:
  o Parking pricing strategies consistent with the Toolbox.
  o Reduced minimum parking requirements.
  o Residential parking permit programs.
  o Designation of a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, with adequate passenger loading and unloading for those vehicles.
  o Adequate bicycle parking.
  o Other strategies in the SANDAG Regional Parking Management Toolbox.

- Measures that reduce VMT through Transportation Systems Management (TSM), including measures included in Appendix DD of the proposed Plan.

- Land use siting and design measures that reduce GHG emissions, including the following:
  o Developing on infill and brownfields sites.
o Building high density and mixed-use developments near transit.

o Developing within areas with high jobs gravity to increase destination accessibility.

o Orienting development towards transit or an active transport corridor.

o Retaining onsite mature trees and vegetation, and planting new trees.

o Measures to plan, design, and build all new, renovated, and upgraded development and infrastructure with electricity demand to achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.

- Measures that increase vehicle efficiency or reduce the carbon content of fuels, including constructing EV charging, alternative fueling stations, or neighborhood electric vehicle networks or charging for electric bicycles consistent with SANDAG’s regional readiness planning for alternative fuels.

- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

- Measures to reduce water consumption, including those listed in mitigation measure WS-1a and WS-1b in Section 4.18.

Findings and Rationale

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

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

Implementation of mitigation measures GHG-5a through GHG-5f, as well as mitigation measures AQ-3b, AQ 3c, AQ-4, TRA-2, WS-1a, and WS-1b, would substantially lessen the amount of proposed Plan GHG emissions in 2030, 2054, and 2050. However, even full implementation of all identified mitigation measures would not be sufficient to reduce the proposed Plan’s GHG emissions to below the regional 2030, 2045, and 2050 reference points based on SB 32, EO B-55-18, and EO S-3-05. Because the proposed Plan’s 2030, 2045, and 2050 GHG emissions would remain
inconsistent with the State’s ability to achieve 2030, 2045, and 2050 GHG reduction goals, this impact (Impact GHG-5) remains significant and unavoidable.

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

**Cumulative Greenhouse Gas Emissions Impacts (EIR Section 5.2.8)**

**Significant Impacts**

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

**Mitigation Measures**

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

**Findings and Rationale**

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

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

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan’s incremental contributions to cumulatively significant greenhouse gas emissions impacts to a less-than-significant level, this impact (GHG-5) remains cumulatively considerable post-mitigation.
H. LAND USE (EIR SECTION 4.11)

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

**Significant Impact**

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

**Mitigation Measure**

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

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

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

**Findings and Rationale**

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

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

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (LU-1) remains significant and unavoidable.
**Cumulative Land Use Impacts (EIR Section 5.2.11)**

**Significant Impacts**

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

**Mitigation Measures**

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

**Findings and Rationale**

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

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

**I. MINERAL RESOURCES (EIR SECTION 4.12)**

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

**Significant Impact**

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

**Mitigation Measure**

Implementation of mitigation measures MR-1a and MR-1b would reduce this significant impact, but not to a less-than-significant level.
MR-1a Conserve Aggregate and Mineral Resources During Planning and Design of Development Projects. During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should avoid or reduce impacts on known aggregate and mineral resources and locally important mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize direct and indirect impacts on these lands. Aggregate and mineral resource areas, especially MRZ-2 areas, should be maintained in open space or other general plan land use and zoning designations that allow for extraction of mineral resources.

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

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

Findings and Rationale

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

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

Cumulative Mineral Resources Impacts (EIR Section 5.2.12)

Significant Impacts

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

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

Findings and Rationale

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

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

L. NOISE AND VIBRATION (EIR SECTION 4.13)

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

Significant Impact

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

Mitigation Measures

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

NOI-1a Implement Construction Noise Reduction Measures for Development Projects and Transportation Network Improvements. During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should, implement construction noise reduction measures to substantially lessen the exposure of noise-sensitive receptors to construction noise levels to achieve applicable
noise standards or prevent substantial temporary increases in noise levels in the planning, design, project-level CEQA review, and construction of development projects or transportation network improvements. These measures should include, but are not limited to, the following.

- Maintain construction equipment and vehicles per manufacturers’ specifications and fit equipment with noise suppression devices (e.g., improved mufflers, equipment redesign, intake silencers, wraps, ducts, engine enclosures).

- Minimize construction equipment idling when equipment is not in use.

- Provide buffer zones or other techniques between stationary equipment (such as generators, compressors, rock crushers, and cement mixers) and the noise receptor.

- For impact tools (e.g., jack hammers, pavement breakers, rock drills), use hydraulically or electrically powered tools; where use of pneumatic tools is unavoidable, use an exhaust muffler on the compressed air exhaust. Use external jackets on the tools themselves. Use quieter procedures such as drills rather than impact equipment.

- For rock-crushing or screening operations, place material stockpiles as a noise barrier blocking line-of-sight between the operations and receptors.

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

- Erect temporary noise barriers around the noise generating activities, particularly adjacent to residential buildings.

- Implement “quiet” pile driving technology (such as pre-drilling of piles, the use of more than one pile driver to shorten the total pile driving duration) or vibratory pile-driving, where feasible, in consideration of geotechnical and structural requirements and conditions.

- Monitor the effectiveness of noise attenuation measures by performing compliance noise monitoring at noise-sensitive receptors during construction.

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

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

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

- Use wheel treatments such as damped wheels and resilient wheels.

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

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

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

**Findings and Rationale**

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

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

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

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

**Significant Impact**

By 2025, 2035, and 2050, forecasted regional growth and land use change and planned transportation network improvements could generate substantial increases in groundborne vibration or groundborne noise levels from construction relating to both regional growth and transportation...
network improvements, and relating to operation of transportation network improvements, resulting in a significant impact. Non-construction impacts relating to regional growth are less than significant.

Mitigation Measures

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

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

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

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

In addition, rail operators can and should implement groundborne vibration and noise-reducing measures to meet applicable FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, including, but not limited to, the following.
• Conduct rail grinding on a regular basis to keep tracks smooth.
• Conduct wheel truing to re-contour wheels to provide a smooth-running surface and removing wheel flats.
• To reduce groundborne noise, achieve vibration isolation of the track from underlying surface using the following.
  o Highly resilient direct fixation fasteners
  o Rail suspended fastener system
  o Isolated slab track system
  o Floating slab track system

Findings and Rationale

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

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

*Cumulative Noise and Vibration Impacts (EIR Section 5.2.13)*

Significant Impacts

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

Mitigation Measures

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

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

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

L. POPULATION AND HOUSING (EIR SECTION 4.14)

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

Significant Impact

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

Mitigation Measures

There are no feasible mitigation measures for this significant impact.

Findings and Rationale

The SANDAG Board of Directors finds that the proposed Plan would induce unplanned growth in some areas of the San Diego region. SANDAG has no control over the amount or exact location of growth the region would experience during the implementation of the proposed Plan. The regional growth and land use change forecasted in the proposed Plan would be implemented by local jurisdictions through local plans and individual development projects, and most transportation network improvements would be implemented by transportation project sponsors other than SANDAG. The proposed Plan has been developed to accommodate forecasted regional growth and failing to do so would be inconsistent with the federal and State requirements for RTPs. In addition, precluding growth would conflict with the requirements to provide sufficient housing for the region’s population contained in SB 375. As discussed in Section 4.14.2, Government Code Section 65080(b)(2)(B)(ii) requires that the RTP/SCS must house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan.
The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives are available to reduce the impact to a less-than-significant level, this impact (POP-1) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

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

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

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

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

Cumulative Population and Housing Impacts (EIR Section 5.2.13)

Significant Impacts

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

Mitigation Measures

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

Findings and Rationale

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

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

M. PUBLIC SERVICES AND UTILITIES (EIR SECTION 4.15)

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

**Significant Impact**

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

**Mitigation Measure**

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

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

**Findings and Rationale**

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

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

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

**Significant Impact**

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

**Mitigation Measure**

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

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

**Findings and Rationale**

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

Implementation of mitigation measure REC-1 would reduce significant impacts related to substantial adverse physical impacts of facility expansion and deterioration of existing parkland and recreational facilities. However, it cannot be assured that adequate financial resources would be available to acquire the amount of parkland needed to meet forecasted population growth and offset losses that would occur a result of transportation improvements. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project
alternatives infeasible. Because no mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (REC-1) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measures**

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

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

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

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

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

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

**Significant Impact**

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

**Mitigation Measure**

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

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

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

• Reuse and/or recycle construction and demolition waste.

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

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

• Prepare and apply a waste management plan that promotes solid waste diversion.

• Implement source reduction through (1) using materials that are more durable and easier to repair and maintain, (2) designing to generate less scrap material through dimensional planning, (3) increasing recycled content, (4) using reclaimed materials, and (5) using structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).

• Reuse existing structures and shells in renovation projects.

• Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable building components.

• Develop an indoor recycling program and space.

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

**Findings and Rationale**

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

Implementation of mitigation measures U-2a, U-2b, and U-2c would reduce significant impacts related to the generation of solid waste and C&D debris that may not be accommodated by the regional landfills. However, there is no guarantee that significant impacts would be reduced to less-than-significant levels for all projects. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (U-2) remains significant and unavoidable.
Cumulative Public Services and Utilities Impacts (EIR Section 5.2.14)

Significant Impacts

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

Mitigation Measures

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

Findings and Rationale

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

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

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

N. TRANSPORTATION (EIR SECTION 4.16)

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

Significant Impact

Implementation of the proposed Plan under Year 2025 and 2035 would result in a smaller decrease in VMT per capita than the reduction goals of 14.3 percent. In 2050, implementation of the proposed
Plan, when combined with the off model strategy reductions, would result in a total reduction of 17.6 percent, greater than the 14.3 percent reduction goal. However, the proposed Plan would result in an increase of 5.4 percent of total VMT, and therefore the impact is considered significant in 2050.

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

Mitigation Measures

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

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

- **Require TDM Strategies** – SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should require all transportation network improvements or land use development projects, that are identified to have a significant VMT-related impact, to implement feasible Transportation Demand Management (TDM) strategies to help offset their impacts. This mitigation measure will further reduce the proposed Plan’s VMT because the potential VMT reductions associated with four TDM programs, which include pooled rides (private), vanpool, carshare, and the implementation of a regional TDM ordinance, were not incorporated into the Activity Based Model (ABM2+). Strategies such as free shuttles, parking facilities for carshare, and site design features to facilitate walking, biking, and transit can and should be used by land development projects to reduce VMT-related impacts. Additional project-level TDM measures not included in the proposed Plan can and should also be used, include walking, school bus programs, school pool programs, subsidized transit passes, unbundled parking, preferential parking programs for carpools/vanpools, and bike sharing programs.

- **Reduce Parking Minimums** – The County of San Diego, cities, and other local jurisdictions can and should evaluate the feasibility of reducing their currently required parking minimums. Reducing the parking minimums for different land use types, where appropriate, can decrease project-level VMT by up to 12.5 percent (CAPCOA 2010).

- **Implement Additional Active Transportation Facilities Not Included in the Proposed Plan** – To further reduce local VMT-related impacts and take advantage of the regional bike network, SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement additional active transportation facilities that provide connections from the regional bicycle network to local neighborhoods. The proposed Plan includes funding for Complete Streets investments in Mobility Hub areas including implementation of bicycle and pedestrian facilities that provide local connections throughout Mobility Hub areas; however, the associated VMT reductions from this funding could not be modeled, so this mitigation measure would achieve further VMT reductions. Direct access to bicycle facilities can reduce project-related VMT by 0.65 percent, while incorporating new pedestrian facilities can reduce project VMT by up to 2 percent (CAPCOA 2010).
• **Road Diet and Traffic Calming** – The County of San Diego, cities, and other local jurisdictions can and should implement road diets or other traffic calming measures within their local roadway network, where feasible, to further reduce VMT-related impacts that may be associated with land development projects or local transportation projects. Road diet and traffic calming measures would also be eligible for Complete Streets funding in Mobility Hub areas. The reduction of existing travel lanes in favor of multi-modal facilities or additional public space can help to calm and deter vehicular trips within an area or along a roadway segment. Traffic calming measures can reduce VMT by 0.5 percent (CAPCOA 2010). It should be noted that the proposed Plan includes funding, through grants, for local jurisdictions to implement road diets.

**Findings and Rationale**

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

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

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

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

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1 This exceeds the CARB target reduction of 14.3 percent by 2050.
additional State policy actions and funding would be required to close the VMT gap between what the Metropolitan Planning Organizations (MPOs) could achieve through implementation of their SCSs and reductions needed to meet State goals.

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

**Cumulative Transportation Impacts (EIR Section 5.2.16)**

**Significant Impacts**

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

**Mitigation Measures**

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

**Findings and Rationale**

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

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

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

O. **TRIBAL CULTURAL RESOURCES (EIR SECTION 4.17)**

*TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in public resources code section 21047 that is either (1) listed or eligible for listing in the California Register of Historic Resources, in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) determined by the lead agency,*
in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1 (2025, 2035, 2050)

Significant Impact

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

Mitigation Measures

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

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

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

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

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

The following are standard mitigation measures for TCRs.
1. Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

2. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
   a. Protecting the cultural character and integrity of the resource
   b. Protecting the traditional use of the resource
   c. Protecting the confidentiality of the resource

3. Record permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

4. Protecting the resource as agreed upon during the tribal consultation process.

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

- Require TCR areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor.

- Should a previously undiscovered cultural resource be encountered during construction activities that is determined to be a TCR by the CEQA lead agency in consultation with Native American tribes, the qualified archaeologist, or tribal monitor if an archaeologist is not present, shall direct the contractor to temporarily divert all ground-disturbing activities in the area of the discovery and prepare and implement a mitigation plan consistent with standard mitigation measures set forth in PRC Section 21084.3(b), in consultation with Native American tribes.

- The qualified archaeologist shall be responsible for ensuring that all artifacts and records associated with the survey, testing, data recovery and/or monitoring of future projects are permanently curated with an appropriate regional center focused on the care, management, and use of archaeological collections. This shall be completed in consultation with the Native American representative and does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants.

- Upon completion of all ground-disturbing activity, the qualified archaeologist shall prepare and submit a draft and final monitoring report to the CEQA lead agency which describes the results, analysis, and conclusions of all phases of the monitoring program, including the provisions for curation and/or repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program.
Findings and Rationale

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

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

Cumulative Tribal Cultural Resources Impacts (EIR Section 5.2.17)

Significant Impacts

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

Mitigation Measures

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

Findings and Rationale

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

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

Implementation of mitigation measures TCR-1a and TCR-1b would reduce the Plan’s significant impacts tribal cultural resources TCRs through construction and ground-disturbing activities, and increased access to TCRs. However, while these mitigation measures reduce the Plan’s significant impacts on tribal cultural resources, it cannot be guaranteed that all future project-level cumulative impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that
specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan’s incremental contributions to cumulatively significant impacts to less-than-significant levels, this impact (TRA-1) remain cumulatively considerable post-mitigation.

P. WATER SUPPLY (EIR SECTION 4.18)

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

Significant Impact

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

Mitigation Measures

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


SANDAG shall, and other transportation project sponsors can and should, implement feasible water conservation measures during planning, design, project-level CEQA review, construction, operations, and maintenance of transportation network improvements, including, but not limited to, the following:

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


The County of San Diego, cities, and other local jurisdictions can and should implement feasible water conservation measures during planning, design, and project-level CEQA review of development projects, including, but not limited to, the following:

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

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

**Findings and Rationale**

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

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

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

**Significant Impact**

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

Mitigation Measures

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

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

- Participate in a groundwater trading program to enable permanent transfer and potentially long-term and short-term lease of baseline pumping allocations to allow groundwater users or new development to purchase needed groundwater allocation from others.

- Use drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.

- Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.

- Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and offsite mitigation.

- Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, and WS-2a have been required in, or incorporated into, the Plan to reduce this significant impact of regional growth and land use changes that would result in population increases that would impede groundwater basin sustainability and would obstruct implementation of the required GMPs. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.
Implementation of mitigation measures WS-1a, WS-1b, and WS-2a would reduce significant impacts related to regional growth and land use changes that would result in population increases that would impede groundwater basin sustainability and would obstruct implementation of the required GMPs. However, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WS-2) remains significant and unavoidable.

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

**Significant Impact**

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

**Mitigation Measures**

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

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

**Findings and Rationale**

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

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

**Cumulative Water Supply Impacts (EIR 5.2.18)**

**Significant Impacts**

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

**Mitigation Measures**

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

**Findings and Rationale**

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

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

**P. WILDFIRE (EIR SECTION 4.19)**

WF-1 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled
**spread of a wildfire; or expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (2025, 2035, 2050)**

**Significant Impact**

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

**Mitigation Measures**

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

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

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

**Findings and Rationale**

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

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

**Significant Impact**

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

**Mitigation Measures**

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

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

- Establishing site-specific safety measures, such as fire protection plans, for new infrastructure and facilities required to provide public services and utilities for new development in order to protect local resources from wildfire.
- Adhering to wildfire safety and mitigation plans established by local utilities companies, including design and construction standards, inspection schedules, and emergency preparedness.
• Adhering to the most updated building code requirements (usually updated every 3 years) for structures related to public services and infrastructure, including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers.

• Ensuring sufficient emergency water supply (local water providers) for existing and new projects.

Findings and Rationale

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

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

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

Significant Impact

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

Mitigation Measures

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

WF-3 Reduce Post-Fire Risks Related to Flooding, Landslides, Slope Instability, or Drainage Changes for Development and Transportation Projects. During planning, design, and project-level CEQA review of development projects or transportation network improvement projects in SRAs or in LRAs classified as VHFSZs, SANDAG shall, and the County of San Diego, cities, and other local jurisdictions can and should, ensure that project applicants work with local communities to implement measures to reduce post-fire impacts. Such measures include, but are not limited to, the following:
• Treating wildfire burned areas to control stormwater runoff prior to winter rains.
• Restoring wildfire areas by planting native vegetation cover or encouraging the regrowth of native species using best practices as soon as possible to aid in control of stormwater runoff.
• Reducing potential for future flood hazard by sufficient removal of dead, woody vegetation along watercourses following a catastrophic fire to reduce the risk of future catastrophic fires.
• Including fire hazard reduction measures that balance forest health with fuel-reducing activities while considering the potential effect on flood management.

Findings and Rationale

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

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

Cumulative Wildfire Impacts (EIR 5.2.19)

Significant Impacts

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

Mitigation Measures

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

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

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

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

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

Implementation of the Plan would result in permanent changes to the existing environments, which have been described throughout this EIR. While the Plan focuses population and employment growth in Mobility Hubs and existing urban areas while also providing transportation investments that support compact land development patterns and reduce sprawl, there will still be some conversion of undeveloped land to urbanized uses. These conversions are considered a permanent irreversible change and would occur directly through construction of development on undeveloped land. Land use changes and transportation network improvements would result in significant irreversible impacts on aesthetics and visual resources, including changes to existing community character and views. Future development projects associated with the Plan would result in a direct irreversible loss of sensitive vegetation communities that supports rare, threatened, or endangered species, and impacts on these resources would be significant and irreversible. The development of currently undeveloped land and other land use changes would result in significant irreversible impacts on agricultural resources and forest lands, and the availability of known mineral resources. The Plan would substantially induce irreversible population growth and increased density, which would displace existing housing units, and result in additional people that would be susceptible to noise impacts. As development occurs at urban edges, additional people and structures would be at risk from wildland fires.
The Plan’s regional growth and land use changes would result in the irreversible consumption of nonrenewable resources. This use will have an incremental and irreversible effect on such resources. The irreversible commitment of limited resources is inherent in any development project or, in the case of the Plan, aggregated development projects. Resources anticipated to be irreversibly committed over the timespan of the Plan include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water. Development associated with the Plan represents a long-term commitment to the consumption of fossil fuel oil and natural gas. These increased energy demands relate to construction, lighting, heating, and cooling of residences and buildings, as well as construction and operation of transit systems.

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

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

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

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

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

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

The Plan would result in construction of additional housing. However, the areas the Plan targets for construction of these additional housing units are largely within previously developed areas. Most of these areas have established roadways and utilities, as well as water and sewer services. The placement of additional housing units in established areas would require upgrading and rezising of existing infrastructure, including water facilities. The upgrading of these facilities would further remove obstacles to the construction of additional housing within and adjacent to these areas. Chapter 2, Project Description, and Section 4.14, Population and Housing, of the EIR, further describe forecasted population, housing unit, and job growth within the region.
The planned transportation network improvements of the Plan are intended to expand upon the current transportation network by providing transportation investments that support compact land development patterns and decrease sprawl while reducing greenhouse gas (GHG) emissions and other environmental impacts. These transportation network improvements would remove obstacles to growth in some areas of the region, which would support additional housing, population, and economic growth. Section 4.14 discusses forecasted regional population and employment growth associated with the Plan.

VII. FINDINGS REGARDING ALTERNATIVES EVALUATED IN EIR

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

A. LEGAL REQUIREMENTS FOR ALTERNATIVES

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

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

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

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

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

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

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

C. ALTERNATIVES ANALYZED IN THE EIR

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

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

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

Alternative 1: No Project

Description

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

The No Project Alternative assumes the Series 14 Regional Growth Forecast with the 2019 Federal Regional Transportation Plan (2019 Federal RTP) land use pattern, plus the Regional Housing Needs Assessment 6th Housing Element Cycle 2021-2029 (6th Cycle RHNA) housing allocations for adopted by the SANDAG Board of Directors (SANDAG Board) in July 2020. The Series 14 Regional Growth Forecast was generated to support the 2019 Federal RTP, which was adopted by the SANDAG Board on October 25, 2019. The 2019 Federal RTP land use pattern and 6th Cycle RHNA would likely be implemented even if the proposed Plan were not adopted because they are based on the adopted general plans of the 18 cities and County government except where additional planning assumptions were necessary to accommodate the 6th Cycle RHNA, which must be implemented under State law. Following the January 2020 release of the California Department of Finance (DOF) population projections, SANDAG developed an updated version of the Series 14
Regional Growth Forecast to reflect the new population projections as the latest planning assumptions. Table O-2 (Appendix O of this EIR) provides a comparison of the population, housing, and employment for the proposed Plan and the alternatives.

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

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

Table 1
Summary of Action Alternatives Considered in the EIR

<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Land Use Pattern</td>
<td>2019 Federal RTP Land Use Pattern</td>
<td>2019 Federal RTP land use pattern</td>
<td>Similar to Proposed Plan except land use pattern with new growth focused in proposed mobility hubs</td>
</tr>
<tr>
<td>Transportation Network</td>
<td>“No Build” Projects</td>
<td>2019 Federal RTP transportation network</td>
<td>Proposed Plan transportation network</td>
</tr>
<tr>
<td>Toll Pricing</td>
<td>Existing Policy</td>
<td>Same as proposed Plan (By 2035, update toll pricing to $0.30 per mile on I-15 and other Managed Lane facilities)</td>
<td>Same as proposed Plan (By 2035, update toll pricing to $0.30 per mile on I-15 and other Managed Lane facilities)</td>
</tr>
<tr>
<td>Road User Charge</td>
<td>None</td>
<td>None</td>
<td>By 2026, increase road user charge rate to 4.95 cents/mile, compared to 3.3 cents/mile by 2030 in the proposed Final Plan</td>
</tr>
<tr>
<td>Parking Costs</td>
<td>Existing Policy</td>
<td>2019 Federal RTP</td>
<td>Increases in parking costs by 50% compared to the proposed Plan</td>
</tr>
<tr>
<td>-----------------------------</td>
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<td>---------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Transit Costs</td>
<td>Existing Policy</td>
<td>2019 Federal RTP (No planned transit fare discounts.)</td>
<td>Free transit by 2035</td>
</tr>
<tr>
<td>Microtransit Costs</td>
<td>N/A</td>
<td>N/A</td>
<td>Free Microtransit by 2035, compared to $1.25 one way/ $3 day in the proposed Plan</td>
</tr>
<tr>
<td>Micro-Transponder ownership</td>
<td>N/A</td>
<td>Same as proposed Plan (Microtransponder(^2) ownership of 100 percent by 2035)</td>
<td>Same as proposed Plan (Microtransponder ownership of 100 percent by 2035)</td>
</tr>
<tr>
<td>Telework Assumptions</td>
<td>N/A</td>
<td>Same as proposed Plan</td>
<td>Same as proposed Plan</td>
</tr>
<tr>
<td>Micromobility</td>
<td>N/A</td>
<td>Same as proposed Plan (Increases in micro-mobility through assumed personal owned e-bike growth)</td>
<td>Same as proposed Plan (Increases in micro-mobility through assumed personal owned e-bike growth)</td>
</tr>
<tr>
<td>Funding</td>
<td>Committed funding</td>
<td>2019 Federal RTP ($130 billion)</td>
<td>Same as Proposed Plan ($163 billion)</td>
</tr>
</tbody>
</table>

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

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

Findings and Rationale

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

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

Second, Alternative 1 fails to meet any of the basic project objectives. Alternative 1 would not focus population and employment growth in existing urbanized areas to protect sensitive habitat and natural resource areas (objective 1) and would not provide transportation investments that support compact land development patterns (objective 2). This alternative would not meet these basic objectives because, in the absence of the Plan’s transportation improvements, there would be less compact development in existing neighborhoods and major transportation corridors and more growth in less developed areas of the region. The absence of the Plan’s transportation improvements and its less compact development and more growth in less developed areas of the region would likely cause the region to not meet the GHG emissions targets established for the San
Diego region by CARB and the SANDAG Board of Directors. This alternative would not meet the objectives to provide transportation investments that promote social equality (objective 4) or to reduce vehicle miles traveled and improve air quality (objective 5) because more people would drive alone, the annual accident rate for bicycles and pedestrians would be higher, and fewer people and jobs would be located near transit stops and bike facilities.

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

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

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

(A) support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
(B) increase the safety of the transportation system for motorized and nonmotorized users;
(C) increase the security of the transportation system for motorized and nonmotorized users;
(D) increase the accessibility and mobility of people and for freight;
(E) protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
(F) enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
(G) promote efficient system management and operation; and
(H) emphasize the preservation of the existing transportation system.

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

Description

Alternative 2 consists of the 2019 Federal RTP transportation network and land use pattern, combined with the new value pricing and user fees policies in the proposed Plan that are compatible with the 2019 Federal RTP network. This alternative could feasibly accomplish most of the basic objectives of the project and substantially lessen one or more of the significant effects by minimizing changes to the existing land use plans in the region. As shown in Table 6-3 in EIR Chapter 6, Alternatives Analysis, significant impacts that would be reduced (but not necessarily all to a less-than-significant level) under Alternative 2 are:
Alternative 2 consists of the land uses in the 2019 Federal RTP, and reflects the adopted general plans of the 18 cities and County except where additional planning assumptions were necessary to accommodate the 6th Cycle RHNA adopted in July 2020, plus the DOF January 2020 release of the State’s population projections. Table O-2 (Appendix O of the EIR) provides a comparison of the population, housing, and employment for the proposed Plan and the alternatives. Land uses for Alternative 2 would be the same as for the No Project Alternative because this land use pattern is based on the adopted 2019 Federal RTP, the adopted general plans of the 18 cities and County, and the State-mandated 6th Cycle RHNA, which would be implemented even if the proposed Plan were not adopted.

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

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

Findings and Rationale

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

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

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

Description

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

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

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

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

Findings and Rationale

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

First, Alternative 3 does not reduce any of the Plan’s significant impacts to less-than-significant levels. Alternative 3 would result in a small decrease of PM10 and PM2.5 emissions compared to the proposed Plan. However, PM10 concentration impacts would be similar to the proposed Plan and would result in a similar significant impact. In addition, Alternative 3 would result in lower GHG
emissions than the proposed Plan but would not meet the reduction target reference points for 2030 and 2045, and would result in similar impacts as the proposed Plan.

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

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

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

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

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

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

- Major elements of the alternative are already included in the proposed Plan or one of the alternatives evaluated in detail in the EIR.
- The alternative is infeasible due to economic, legal, or other considerations.
- The alternative fails to reduce any of the proposed Plan’s significant environmental impacts.
- The alternative fails to meet most of the basic project objectives.
- The alternative is for individual project components rather than the proposed Plan as a whole.
D.1 Accelerated Plan Implementation

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

Reasons for Rejection

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

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

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

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

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

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

- Increases in primary and occasional telework jobs by 2025, 2035, and 2050 based on latest planning assumptions. In 2025, a projected 9.7 percent of employment would be primarily telework, and another 9.8 percent would be occasional telework. In 2035, it is projected that 10.9 percent of jobs would be primary telework, and another 11.8 percent would include
occasional telework. In 2050, it is projected that 12.7 percent of employment would be primary telework jobs, and another 14.8 percent would include occasional telework.

Reasons for Rejection

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

D.3 Transit-Constrained Transit Alternative

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

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

Reasons for Rejection

This comment was received prior to SANDAG developing the 5 Big Moves Vision, which served to guide the development of the proposed Plan. The proposed Plan substantially addresses many of the suggestions included in this proposed alternative (e.g., converting existing general purpose lanes to managed lanes, providing more compact land use patterns, substantially lowering transit fares, increasing the price of parking). In addition, Alternative 3 further expands on many of these components, including even more accelerated transit investments, more compact land use patterns, and high transit subsidies, parking pricing, and driving costs. The proposed Plan does not include investments drawn from the unconstrained transit network because the proposed Plan re-envisioned the entire transportation network, and because reasonably foreseeable funding sources for unconstrained projects have not been identified. The proposed Plan does not add funding to add general purpose freeway lanes, but instead focuses on adding Managed Lanes where feasible and appropriate by converting existing general purpose lanes or roadway shoulders. The proposed Plan cannot exclude all roadway and freeway funding and expansion as that would preclude the addition of Managed Lanes, which increase the efficiency of roadway travel for vehicles and transit. Further,
there is no evidence that excluding funding for Managed Lanes would avoid or further and substantially reduce any of the proposed Plan’s significant impacts identified in the EIR.

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

D.4 Coastal Protection Alternative

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

Reasons for Rejection

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

D.5 Climate, Housing, Transit Alternative

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

- 40 percent reduction in GHG below 1990 levels by 2030.
- 80 percent reduction in GHG below 1990 levels by 2050.
- 25 percent reduction in per capita GHG from passenger cars and trucks relative to 2005 by 2035.
- 14.3 percent reduction in total daily VMT per capita, and 16.8 percent reduction in total light-duty VMT per capita, relative to 2015-2018 average by 2050.
- 50 percent transit, walk and bike mode share for commuters within ½ mile of a major transit stop in City of San Diego by 2035.
- 150 percent increase in transit mode share.
- Adequately plan to meet the housing needs of everyone in the community.
• SB 743 VMT reduction goals.

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

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

• Walkable compact land use.

• Excluding roadway/freeway funding and expansion.

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

Reasons for Rejection in Draft EIR

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

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

Both the proposed Plan and Alternative 3 achieve a greater than 150 percent increase in walk to transit and drive to transit mode share by 2050, along with similar increases in walk and bike mode
share. Mode share within 0.5 mile of a major transit stop is not specifically measured for the proposed Plan or Alternative 3.

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

The remaining goals of the Climate, Housing, Transit Alternative are considered infeasible to achieve. As described above and in the analyses of this EIR, the proposed Plan includes several major changes in transportation investments and other policy changes specifically for the purpose of reducing total GHG and VMT. Even if SANDAG could achieve zero GHG emissions from the transportation sector (the area that SANDAG has the most control over), it still would not be possible to meet the targets of carbon neutrality by 2045 and 80 percent reduction of 1990 levels by 2050 due to emissions from non-transportation sectors. Table 4.8-8 in Section 4.8 of the EIR shows total GHG emissions in the San Diego region from 2016 to 2050. Even assuming zero GHG emissions from the on-road transportation sector, the region would still have GHG emissions of 10.31 million metric tons of carbon dioxide equivalent (MMTCO₂e) by 2050, a 5.11 MMTCO₂e shortfall as compared to the State target of 5.2 MMTCO₂e.

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

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

D.6 10 Big Moves to Transportation Justice

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

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

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

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

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

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

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

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

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

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

**Reasons for Rejection**

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

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

Goal (4), 24 Hour Service by 2025 is not included in the proposed Plan; however, frequency for most transit service will be increased to 4 a.m. through 12 a.m. under the proposed Plan, with frequency
of 4 a.m. through 2 a.m. for commuter rail routes 581, 582, and 583; light rail transit routes 399, 510, 520, and 555; and some bus routes. Twenty-four hour service is anticipated for the airport connection served by route 577. There is no evidence that this goal would avoid or further and substantially reduce any of the proposed Plan’s significant impacts identified in the EIR.

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

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

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

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

VIII. FINDINGS REGARDING ALTERNATIVES PROPOSED IN COMMENTS

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

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

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

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

Alternatives suggested by commenters include, but are not limited to:
• A feasible alternative that would substantially reduce vehicle trips and vehicle miles traveled (VMT).
• Save Our Forests and Ranchlands’ (SOFAR’s) and Cleveland National Forest Foundation’s (CNFF’s) Climate, Housing, Transit Alternative.
• An alternative that substantially lessens significant impacts on biological resources.
• An alternative with VMT reduction features such as subsidized transit fares and microtransit.
• Southwest Wetlands Interpretive Association’s (SWIA’s) alternative that prioritizes transit over managed lanes, institutes a much more rigorous monitoring system, adds a regional habitat conservation fund, and ensures enforcement of Plan compliance.
• An alternative that reduces greenhouse gas (GHG) emissions consistent with State goals or achieves net zero emissions.

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

Under CEQA, absolute perfection is not the standard governing a lead agency’s proposed range of project alternatives. Rather, in preparing an EIR, a lead agency need only make an objective, good faith effort to provide information permitting a reasonable choice of alternatives that would feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening the project’s significant adverse environmental impacts. (California Oak Foundation v. Regents of University of California (2010) 188 Cal.App. 4th 227, 275-276.)

**Alternative that Substantially Reduces VMT Below Existing Levels**

Commenters suggest the Draft EIR should have evaluated a project alternative that substantially reduces VMT below existing levels. Alternative 3 consists of the proposed Plan transportation network, a land use pattern that restricts all regional growth to the mobility hubs, and more progressive value pricing and user fees policies than what is included in the proposed Plan; it achieves lower total VMT than the proposed Plan, though still above existing levels.

**Findings and Rationale**

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above. An alternative including further VMT-reduction measures to reduce total VMT below existing levels is not currently feasible for several reasons, including:

• **Further** substantial changes needed in State and federal policy and legislation. These would include still further changes in State road pricing policy, land use policies, and parking policies—beyond those included in the proposed Plan and Alternatives 2 and 3—that are not reasonably foreseeable.

• Lack of funding for **further and accelerated** major transit service improvements (recognizing that, as discussed in additional detail in subsequent discussion, increased transit investments alone cannot achieve substantial VMT reductions). The request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the
lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network.

- Severe economic and social impacts caused by substantial increases in driving costs. Alternative 3 already raises the fees compared to the proposed Plan. From a consumer standpoint, increases in fuel or vehicle user costs can be a trade-off with discretionary expendable income for purchasing food, clothing, and other personal items, especially for lower income households. A significant increase in fuel cost or vehicle user fees would also result in lower spending in other areas of the economy, and economic disruption would occur in adjusting to higher fuel or vehicle registration prices.

- Lack of authority for SANDAG and local governments to implement such further measures. For example, SANDAG has no authority to increase State road pricing, or require local governments to implement land use or parking policies.

- SANDAG’s inability to control the total regional population growth that is the main cause of total VMT increases. As SANDAG modeling indicates, population growth is the main driver of future VMT growth. Alternative 3 would result in VMT per capita of 15.6 (home-based) compared to the proposed Plan VMT per capita of 16.03 in 2050. Alternative 3 would result in a total VMT increase of 2,756,715 miles per day in year 2050, which is approximately 39 percent lower than the proposed Plan (total VMT increase of 4,519,230 miles per day in year 2050). Population growth under the proposed Plan, however, increases by 13 percent. Even with decreases in driving per capita, under Alternative 3 total VMT still increases by 3.2 percent compared to 2016 because population growth outpaces driving reductions. As courts have noted, “CEQA is not intended as a population control measure” (Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 220).

**SOFAR’s and CNFF’s Climate, Housing, Transit Alternative**

This alternative was proposed in scoping, but considered and rejected from detailed consideration in the Draft EIR; in response to a later October 7, 2021, Draft EIR comment letter reiterating it should have been included, further explanations for rejection are included in the Final EIR’s responses to SOFAR’s and CNFF’s Draft EIR comment letters.

The letter requests that SANDAG analyze the effect that Managed Lanes have on transit ridership (i.e., how many transit trips would occur with Managed Lanes versus without Managed Lanes). The letter also suggests that the modeling for the proposed Plan should advance implementation of all transit projects in the first 10 years of the Plan in order to truly understand the effect that a comprehensive transit network would have in achieving the region’s environmental and housing goals. In particular the letter suggests that the Plan accelerate the implementation of the LOSSAN double track rail project and the Miramar tunnel rail line and straightening project.

As explained in the Draft EIR (pages 6-14 and 6-15), some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3. These include comprehensive transit investments in: high-speed commuter rail; tunneling and double-tracking where feasible; rail line straightening, higher-speed and higher-frequency transit with separate rights-of-way, fewer stops, grade separation, and new high-speed lines; a Central Mobility Hub that connects to the airport as well as to transit elements offering further interconnectivity throughout the San Diego region; and expanded local transit and shared mobility. The proposed Plan and Alternative 3 also include an intensified, compact land use, as well as expanded active transportation infrastructure improvements.
As discussed in Appendix P, Response to Comments, of the EIR, SANDAG conducted a modeling analysis to compare the proposed Plan network with Managed Lanes investments to a network consistent with SOFAR’s request in the Draft EIR comment letter. The model run assumed no new Managed Lanes, only transit lanes, and accelerated the LOSSAN double-track rail project and the Miramar Tunnel rail line and straightening project to 2035. Converting Managed Lanes to transit lanes and accelerating the two rail projects as suggested for the SOFAR alternative results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them (see responses to comments 35-7 and 35-16).

Findings and Rationale

This alternative includes the following major components that were not included in the proposed Plan or EIR alternatives, for the reasons discussed below:

- A “transit first” plan that substantially reduces VMT and provides substantive benefits in transit/bike/walk mode share and advancing all transit projects to the first 10 years of the Plan.
- Prioritize transit/active transit over managed lanes.
- Accelerate implementation of the Los Angeles–San Diego–San Luis Obispo Rail Corridor (LOSSAN) double-track rail project and Miramar tunnel and rail line straightening project.

With regards to accelerating transit to the first 10 years of the Plan, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as Federal Transit administration (FTA) Section 5307 or Regional Surface Transportation Program (RSTP) are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but cannot advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as the State Highway and Protection Program (SHOPP) funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by the California Department of Transportation (Caltrans).

With regards to prioritizing transit over managed lanes and accelerated implementation of rail projects, SANDAG conducted a modeling analysis to compare the proposed Plan network with Managed Lanes investments to the Climate, Housing, Transit Alternative. The model run assumed no new Managed Lanes (only transit lanes), and accelerated the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR’s and CNFF’s Draft EIR comment letter, converting Managed Lanes to transit lanes and accelerating the Miramar Tunnel rail line results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

In summary, the Climate, Housing, Transit alternative was not selected for detailed consideration in the EIR because:

- Some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3.
- It is infeasible to accelerate transit to the first 10 years of the Plan and redirect all roadway funding to transit.
• The Climate, Housing, Transit alternative results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

• It is infeasible to achieve the GHG and VMT reduction goals proposed in the Climate, Housing Transit alternative; see Draft EIR pages 6-15 through 6-16 and the discussion below regarding the infeasibility of an alternative that reduces GHG emissions consistent with State goals.

Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

Alternative that Substantially Lessens Significant Impacts on Biological Resources

A commenter suggested an alternative that would avoid or substantially lessen impacts on biological resources.

Findings and Rationale

As discussed in Section 4.4, Biological Resources, of the EIR the impacts on biological resources were analyzed at a programmatic level based on best available information. Impacts were analyzed based on the programmatic footprint developed for the 2021 Regional Plan, and mitigation measures were identified accordingly that achieve substantial reductions to impacts. Additional analysis will be conducted on a project-specific level under CEQA, including project-specific impact analysis of biological resources and identification of mitigation measures. Mitigation measures would be refined and implementation methods identified, as required by CEQA, the local jurisdictions, and Wildlife Agencies on a project-specific level.

The Plan places emphasis on maximizing the use of existing facilities and focusing growth within urban areas to preserve habitat and open space. In addition, Alternative 3 has a smaller footprint and would further reduce impacts on biological resources. In summary, the proposed Plan and Alternative 3 both substantially reduce biological resources with the implementation of mitigation measures and the proposed footprints, and a new alternative that also reduces such impacts is not required for an adequate range of alternatives. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

Alternative with Subsidized Transit Fares and Microtransit

Another commenter requested that alternatives that include features such as subsidized transit fares and microtransit be considered. SANDAG considered public input provided during the EIR scoping process, and used this input to develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT.

Findings and Rationale

The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested, including subsidized transit fares and microtransit. As discussed in Chapter 6, Alternative 3 (All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies) includes free transit and microtransit by 2035. Because Alternative 3 would not reduce any of the Plan’s significant impacts to less-than-significant levels, just modifying the transportation network to include subsidized transit fares and microtransit would not be enough to substantially reduce VMT and GHG emissions as compared to the proposed Plan.
In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by fiscal year (FY) 2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, Metropolitan Transit System (MTS), and North County Transit District (NCTD) are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

Southwest Wetlands Interpretive Association’s Alternative

SWIA suggest an alternative that prioritizes transit over managed lanes, institutes a much more rigorous monitoring system, adds a regional habitat conservation fund, and ensures enforcement of Plan compliance.

Findings and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible this suggested alternative. Reasons for not including each of the four components in an EIR alternative are discussed below. In addition, there is no evidence that collectively, they would substantially reduce any of the proposed Plan’s significant impacts.

Prioritizing transit over managed lanes

Comments suggest that the proposed Plan should prioritize transit over managed lanes. The Managed Lanes network of the proposed Plan uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and High-Occupancy Vehicles (HOVs) to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the Regional Plan.

As discussed above under SOFAR’s and CNFF’s Climate, Housing, Transit Alternative, SANDAG conducted a modeling analysis to compare the proposed Plan network with managed lanes investments to the Climate, Housing, Transit Alternative, which focuses on prioritizing transit. The model run assumed no new managed lanes (only transit lanes), and accelerated the LOSSAN double-track rail project and the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR’s and CNFF’s Draft EIR comment letter, converting managed lanes to transit lanes and accelerating the two suggested rail projects results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

Furthermore, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network, as described further under the SOFAR and CNFF Climate, Housing, Transit Alternative above.
Monitoring system for transportation system’s buildout and performance

Comments suggest that SANDAG implement clear and definitive mechanisms to monitor future population growth, jobs, and housing development in accordance with the proposed Plan to ensure that transportation system investments are in line with development and growth trends.

As identified in Appendix B of the Regional Plan, SANDAG will continue to monitor the implementation of the Regional Plan on a 4-year cycle and make the data accessible to the public. Monitoring would occur 2 years after adoption of the Regional Plan. Furthermore, SANDAG has committed to monitor the implementation for the SCS on a 2-year cycle pursuant to California Assembly Bill 1730 (Gonzalez 2019). A performance monitoring report using the indicators from Appendix E of the Regional Plan is developed halfway between each 4-year regional plan cycle. The report is shared with the SANDAG Board of Directors to provide a high-level status update on critical areas across the region. This information helps inform the Board of Directors in their development of regional goals for the subsequent regional plan. The indicators use available observed data that also informs how each indicator is calculated. In summary, some specific feasible components of this alternative are already included in the proposed Plan.

Regional Habitat Conservation Fund

Comments suggest that an alternative that includes a regional habitat conservation fund be included in the EIR. Appendix AA of the Regional Plan describes the status of the Habitat Conservation Plans (HCPs) within the region. Each local jurisdiction that signed an Implementing Agreement for their HCP has been granted “take” authorization for impacts on endangered and threatened species. By way of the take authorizations, the local jurisdictions have made commitments to fund the local costs for acquisitions, management, and monitoring. Funds to cover these local costs will be raised on a regional or plan area basis as outlined in the Implementing Agreements.

SANDAG will continue its existing grant programs, partner with member agencies on State funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the 2021 Regional Plan. To meet the region’s habitat conservation goals, the 2021 Regional Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8, Greenhouse Gas Emissions, of the EIR), and $300–$500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).

As such, because HCP funding is already included in the proposed Final Plan, no additional alternative with this component is necessary.

Ensuring enforcement

Comments suggest that an alternative should ensure enforcement of the jurisdictions’ compliance with the Plan. Land use authority is reserved to local jurisdictions: the cities and the County. The cities and the County are best positioned to effectively implement and monitor the objectives outlined in the 2021 Regional Plan as those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program, and it will meet the goals of the proposed Final 2021 Regional Plan.

The 2021 Regional Plan envisions forecasted growth to be concentrated in Mobility Hubs throughout the region, which will be implemented in close coordination with local jurisdictions to align with the unique needs of each community. Many Mobility Hubs are employment centers or other popular
destinations, and SANDAG would work with local jurisdictions to update plans and policies to allow for more housing in these locations where feasible. Local jurisdictions maintain land use authority and are responsible for decisions regarding density, zoning, and housing policies.

In addition, for second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used. Where SANDAG acts as a pass-through agency for funding, it is the funding agency’s responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

In summary, a number of enforcement provisions are already included in the proposed Plan, and an additional alternative with this component is not required.

**Alternative that Reduces GHG Emissions to Net Zero or Consistent with State Goals**

Multiple commenters assert that the range of alternatives is not reasonable because the alternatives would still be inconsistent with statewide GHG reduction and climate goals.

**Findings and Rationale**

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible this suggested alternative. For the reasons discussed below.

The Draft EIR Impact GHG-5 analysis explains why it is infeasible for the proposed Plan to be consistent with the State's ability to meet the 2030 reduction target of SB 32 and the long-term reduction goals of Executive Orders B-55-18 (2045) and S-3-05 (2050). Similar feasibility constraints apply to other potential proposed Plan alternatives. In addition, as identified in Section 4.8 of the EIR, the proposed Plan would reduce GHG emissions for all three horizon years. As discussed in the Draft EIR, p. 4.8-40, the State has yet to develop or adopt an overarching plan that provides the framework for how California will achieve carbon neutrality by 2045. California’s 2017 Climate Change Scoping establishes the statewide framework for achieving the goal of a 40 percent reduction from 1990 GHG levels in 2030 and put post-2030 statewide emissions on a downward trajectory toward the long-term statewide GHG reduction goals for 2045 and 2050. The 2017 Scoping Plan indicates that to achieve these targets and goals, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California’s natural and working lands, and sustainable solid waste management are among many actions the State must take. The State has not adopted a plan analogous to the 2017 Scoping Plan since that addresses achieving the EO S-3-05 goal of reducing statewide GHG emissions by 80 percent below 1990 levels by 2050 or the B-55-18 goal of achieving statewide carbon neutrality no later than 2045.

The proposed Plan would assist in meeting the statewide 2030 GHG target in putting statewide emissions on a downward trajectory toward statewide post-2030 goals by reducing GHG emissions in the passenger vehicle sector through the implementation of transportation network improvements and programs and efficient land use patterns to ultimately reduce VMT and the combustion of gasoline and diesel fuels pursuant to SB 375. However, it is unknown at this time what combination of reduction and removal strategies will be pursued in California to achieve this goal. Available research and reports, discussed in detail in Section 4.8 of the EIR, indicate that achieving statewide GHG reduction goals will require major shifts or even fundamental transformations in the economic, social, technological, and political fabric of life in California and beyond, including the development of new technologies; large-scale deployment of new and existing technologies; and the roles of
local, State, and the federal government in regulating economic activities and personal behaviors that affect GHG emissions.

Furthermore, as discussed in Chapter 2, Project Description, of the EIR SANDAG updates the Regional Plan every 4 years, and future iterations of the Plan and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region’s progress toward the State’s goal of carbon neutrality by 2045. The required GHG reductions from the aforementioned sectors will be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. As such, a proposed Plan alternative that further reduces GHG emissions consistent with State GHG reduction goals was not included for detailed consideration in the EIR because it is beyond SANDAG’s or local agencies’ current ability to implement.

IX. FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT EIR AND REVISIONS TO THE FINAL EIR

Finding: Appendix P of the EIR includes the comments received on the Draft EIR and responses to those comments. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by CEQA Guidelines §15088(b). The EIR also incorporates information obtained and produced after the Draft EIR was completed, including additions, clarifications, and modifications. The Board has reviewed and considered the Final EIR and all of this information.

The Board finds that responses to comments made on the Draft EIR and revisions to the Final EIR merely clarify, amplify, or make insignificant modifications to the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines §15088.5.

Rationale: CEQA Guidelines §15088.5 provides:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification…. “Information” can include changes in the project or environmental setting as well as additional data or other information….“Significant new information” requiring recirculation includes, for example…

   (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

   (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

   (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.

   (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. …

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The new information added to the EIR does not involve a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible mitigation measure or alternative considerably different from others previously analyzed that SANDAG declines to adopt and that would clearly lessen the significant environmental impacts of the Plan.
Changes to Draft Regional Plan

None of the changes to the Draft 2021 Regional Plan made in the proposed Final 2021 Regional Plan and reflected in the Final EIR project description constitutes “significant new information” that would trigger EIR recirculation. Rather, they are relatively minor changes that “clarify” or “amplify” the Draft EIR’s project description. None of the changes represent or suggest a new project alternative or mitigation measure, so the below analysis focuses on the potential for new or worse significant impacts.

- **Funding Strategy:** The updated funding strategy reflects implementation of a State and regional Road Usage Charge by 2030, and also proposes bonding against future local revenues to fund near-term projects. These fiscal changes to the Draft EIR project description would not create a new or worse significant environmental impact.

- **Land Use and Mobility Hubs:** Explanations were added about the regional Mobility Hub areas and assumptions of the Sustainable Communities Strategy (SCS) land use pattern. These explanations represent clarifications to the Draft EIR project description, and would not create a new or worse significant environmental impact.

- **Habitat Conservation:** The region’s dedication to habitat and open space preservation is emphasized. This amplification of the Draft EIR project description would not create a new or worse significant environmental impact.

- **Vision Zero:** The region’s commitment to safety and Vision Zero is highlighted with clarity on investments that support vulnerable road users. Again, this amplification of the Draft EIR project description would not create a new or worse significant environmental impact.

- **Projects and Phasing:** Appendix A, *Transportation Projects, Programs, and Phasing*, is updated to describe and map the improvements to each major corridor area and the process used to phase projects. Updates to the project list include the removal of redundant freeway connector projects, inclusion of studies underway for transit projects and services, addition of active transportation projects, and clarity regarding use of existing footprint for improvements on State Route 52 and other complete corridor projects. These updates do have the potential to create new environmental impacts, but are relatively minor changes that would not create a new or worse significant environmental impact.

  Appendix A was also revised to include documentation of strategies to reduce pollution exposure in disadvantaged communities required by Assembly Bill 805 which was previously included in Appendix H, and to add a detailed list of future transit route frequencies and spans of service. This clarification and amplification of the Draft EIR project description would not create a new or worse significant environmental impact.

- **Transit Leap:** Transit Leap strategy was updated to include bathrooms at new rail stations, several minor near-term actions, and evaluation of the transition to free public transit. These minor changes to the Draft EIR project description would not create a new or worse significant environmental impact.

- **Flexible Fleet Pilots:** Additional detail on Flexible Fleets was added to emphasize the importance of pilot projects and partnerships. This amplification of the Draft EIR project description would not create a new or worse significant environmental impact.

- **Cumulative Effect of All Changes to the Regional Plan:** Collectively, the above changes to the 2021 Regional Plan represent minor changes, clarifications, and/or amplifications. Collectively, they do not amount to a major revision to the Draft EIR project description that
would make the Draft EIR “so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

**Changes to Draft EIR**

The discussion below summarizes certain environmental impacts that increased from the Draft EIR to the Final EIR, and explains why these changes do not result in a new significant impact, or a substantial increase in the severity of a significant impact identified in the Draft EIR:

- **Impact acreage updates related to Projects and Phasing:** As discussed above, updates to projects and phasing in the proposed Plan resulted in minor updates to impact acreages included in the Final EIR. Instances where this resulted in minor impact acreage increases include Section 4.2, *Agricultural and Forestry Resources*, Section 4.4, *Biological Resources*, and Section 4.15, *Public Services and Utilities*. In all instances, acreage increases were very minor relative to the impact previously included in the Draft EIR and would not create a new or worse significant environmental impact.

- **Vehicle Miles Traveled:** As discussed in detail in Section 4.16, *Transportation*, VMT numbers were revised to reflect the minor modifications to the transportation network improvements included in the proposed Plan as well as minor corrections made to the ABM2+. As a result, total VMT increased from 0.6 percent to 1.1 percent between 2016 and 2025 but decreased between 2016 and 2035 and 2050. As such, these changes would not create a new or worse significant environmental impact related to VMT, nor would it affect other conclusions in the Final EIR.

**X. FINDING ADOPTING A MITIGATION MONITORING PROGRAM**

The SANDAG Board of Directors finds that a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Plan and has been adopted concurrently with these Findings (Public Resources Code, §21081.6(a)(1)). SANDAG will use the MMRP to track compliance with mitigation measures. The MMRP will remain available for public review during the compliance period.

**XI. FINDING REGARDING LOCATION AND CUSTODIAN OF RECORD**

The documents and other materials that constitute the record of proceedings on which SANDAG’s Findings of Fact are based are located at 401 B Street, Suite 800, San Diego, California 92101. The custodian of these documents is Kirsten Uchitel, Associate Planner. This information is provided in compliance with Public Resources Code §21081.6(a)(2) and 14 Cal. Code Regs. §15091(e).

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents, at a minimum:

- The Notice of Preparation and all other public notices issued by SANDAG and in conjunction with the Project.
- The Draft and Final EIRs, including appendices and technical studies included or referenced in the Draft and Final EIRs.
- All comments submitted by agencies or members of the public during the 45-day public comment period on the Draft EIR.
- All comments and correspondence submitted to SANDAG with respect to the Project.
- The MMRP for the Project.
• All Findings and resolutions adopted by SANDAG decision makers in connection with the Project, and all documents cited or referred to therein.

• All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by ICF, consultants to SANDAG.

• All documents and information submitted to SANDAG by responsible, trustee, or other public agencies, or by individuals or organizations, in connection with the Project, up through the date the SANDAG Board of Directors approved the Project.

• Minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by SANDAG, in connection with the Project.

• Any documentary or other evidence submitted to SANDAG at such information sessions, public meetings, and public hearings.

• Matters of common knowledge to SANDAG, including, but not limited to federal, state, and local laws and regulations.

• Any documents expressly cited in these Findings, in addition to those cited above.

• Any other materials required to be in the Record of Proceedings by Public Resources Code §21167.6(e).
References


STATEMENT OF OVERRIDING CONSIDERATIONS
FOR SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN

The San Diego Association of Governments (SANDAG) Board of Directors (Board) adopts and makes this statement of overriding considerations concerning San Diego Forward: The 2021 Regional Plan’s (the Plan’s) unavoidable significant impacts to explain why the Plan’s benefits override and outweigh its unavoidable impacts.

The Final Environmental Impact Report (EIR) has identified and discussed significant effects that would occur as a result of the Plan. As set forth in the California Environmental Quality Act (CEQA) Findings for the EIR, SANDAG has made a reasonable and good faith effort to avoid or substantially reduce the significant impacts resulting from the Plan and has made specific findings on each of the proposed Plan’s significant impacts and on mitigation measures and alternatives. Even with implementation of all feasible mitigation, however, the Plan will result in significant and unavoidable impacts, both direct and cumulative, to: Aesthetics and Visual Resources; Agricultural and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Geology, Soils, and Paleontological Resources; Greenhouse Gas Emissions; Land Use; Mineral Resources; Noise and Vibration; Population and Housing; Public Services and Utilities; Transportation; Tribal Cultural Resources; Water Supply; and Wildfire.

In accordance with Section 15093 of the CEQA Guidelines, and having reduced the significant environmental effects of the 2021 Regional Plan to the extent feasible, having considered the entire administrative record on the 2021 Regional Plan, and having weighed the benefits of the Plan against its unavoidable adverse impacts after mitigation, the Board hereby finds that the following legal, economic, social, and environmental benefits of the 2021 Regional Plan outweigh its unavoidable adverse impacts and render them acceptable based upon the following considerations. Each benefit set forth below constitutes an overriding consideration warranting approval of the Plan, independent of the other benefits, despite each and every unavoidable impact.

2021 Regional Plan Benefits

SANDAG developed seven project objectives for the EIR to achieve the underlying project purpose of the Regional Plan to address the many regional transportation challenges by integrating land use planning and transportation improvements and using technology to offer more options for travel and increase safety. The outcome would be even greater mobility and transportation connectivity, and a shift away from overloading roadways with single-occupant cars, even as the regional population continues to expand. The Plan achieves the vision in the following ways:

Greenhouse Gas Emissions and Vehicle Miles Traveled Benefits

- The Plan will achieve the Senate Bill 375 (Steinberg, 2008) (SB 375) regional greenhouse gas reduction target, reducing 2035 per capita emissions by 20 percent compared to the SB 375 2005 baseline (Final EIR Section 4.8, Greenhouse Gas Emissions).

- The Plan will lower vehicle miles traveled per capita. Daily vehicle miles traveled per capita will decrease by about 15 percent under the Plan, from 18.94 miles per person per day in 2016 to 16.03 miles per person per day in 2050 (Final EIR Section 4.16, Transportation).
The Plan will result in sustained and continued reductions in total GHG emissions from passenger vehicle and light duty trucks. In 2016, there were 10.5 million metric tons of carbon dioxide equivalent (MMTCO$_2$e) emitted from passenger vehicles and light duty trucks; in 2025, the Plan will reduce emissions to 8.0 MMTCO$_2$e; in 2035 to 6.5 MMTCO$_2$e; and in 2050 to 6.4 MMTCO$_2$e. (Final EIR Section 4.8, Greenhouse Gas Emissions.)

The Plan will result in sustained and continued reductions in total GHG emissions from all sources. In 2016, total annual emissions were 25.8 MMTCO$_2$e; in 2025, the Plan will reduce total annual emissions to 22.4 MMTCO$_2$e; in 2035 to 19.1 MMTCO$_2$e; and in 2050 to 18 MMTCO$_2$e (Final EIR Section 4.8, Greenhouse Gas Emissions).

**Land Use and Housing Benefits**

The Sustainable Community Strategy (SCS) land use pattern uses Mobility Hubs to concentrate future development by incentivizing land uses and transportation infrastructure that maximize the connectivity of the transportation system set out in the 2021 Regional Plan. In 2016, approximately 44 percent of the region’s population lived in Mobility Hub areas, but under the SCS land use pattern that number is projected to grow to 53 percent by 2050. With the Plan, the percentage of the region’s population with access to Tier 1 employment centers (employment centers with concentration of more than 75,000 employees) within 30 minutes using transit will grow from 21 percent in 2016 to 36 percent in 2050, and those with access to these employment centers within 45 minutes using transit will grow from 37 percent to 58 percent by 2050. (2021 Regional Plan, Chapter 2.)

The SCS land use pattern addresses the mobility needs of all segments of the population. Thirty-minute transit access to Tier 1 employment centers increases from 22 percent to 36 percent for minorities and increases from 25 percent to 42 percent for residents with low incomes by 2050. By 2050, the percentage of minorities and residents with low incomes who can access higher education within 30 minutes by transit increases by 10 percent or more regionwide. Similar improvements are also found in 15-minute access to retail via transit (2021 Regional Plan, Chapter 2). The Plan will increase the percentage of the low income and minority populations within 30 minutes of jobs and higher education via transit. For the low income population, the percentage of the population within 30 minutes of an employment center and higher education via transit will increase from 86.9 percent in 2016 to 89.8 percent in 2050 and 50.4 percent to 62.7 percent in 2050, respectively. The percentage of minority population within 30 minutes of an employment center and higher education on transit will increase from 84.9 percent in 2016 to 87.4 percent in 2050 and 48.2 percent to 57.7 percent in 2050, respectively (2021 Regional Plan, Appendix H, Tables H.4 and H.7).

Forecasted growth will become more sustainable over time under the Plan’s SCS. More than 93 percent of housing growth by 2050 will be multifamily development, as shown in the Series 14 Regional Growth Forecast. This trend towards multifamily development will help the region accommodate the projected housing needs for residents of all income levels in a more environmentally sustainable manner. (2021 Regional Plan, Appendix F.)

The Regional Plan land use pattern protects and preserves about 1.3 million acres of land as open space, more than half (about 55 percent) of the San Diego region’s land area. These open space lands include habitat conservation areas, parks, steep slopes, farmland, floodplains, and wetlands. (Final EIR, Section 4.15, Public Services and Utilities.)
The Plan has supporting policies to provide the necessary regional funding for the completion of the habitat conservation plans such as the Multiple Species Conservation Plan (MSCP) and Multiple Habitat Conservation Plan; $3 billion has been identified, which will provide funding for acquisition, management, and monitoring. The Plan will provide the necessary funding to provide a more sustainable land use pattern for habitat conservation and recovery of endangered species. (2021 Regional Plan, Appendix B, pages B-11–B-15.)

Transit, Bicycle/Pedestrian, and Carpool Benefits

The Plan’s new transit services combined with the compact land use pattern of the SCS will increase the number of people within a half-mile of a high-quality public transit stop (commuter rail, light rail, or next gen Rapid) from 9.1 percent in 2016 to 35.0 percent in 2050. Similarly, the percentage of jobs within a half-mile of a high-quality public transit stop will increase from 21.3 percent in 2016 to 47.8 percent by 2050. (2021 Regional Plan, Appendix T, Table T6.2.)

Similarly, the Plan will increase the percentage of low income, minority, and senior populations within a half-mile of a high-quality public transit stop. For the low-income populations, 41.1 percent will be within a half-mile of a high-quality public transit service stop by 2050, up from 11.8 percent in 2016. For the minority population, 36.1 percent will be within a half-mile by 2050, up from 10.4 percent in 2016. For seniors, 34.7 percent will be within a half-mile by 2050, up from 8.0 percent in 2016. (2021 Regional Plan, Appendix H, Table H.3.)

The Plan will result in a higher mode share for walk, bike, transit, and carpools. By 2050, the walk, bike, transit, and carpool mode share for all trips will be 59.2 percent, up from about 53.6 percent in 2016. Transit mode share will increase from about 1.6 percent in 2016 to about 5.2 percent in 2050. Walk and bike mode share will increase from about 7.8 percent in 2016 to 13.6 percent in 2050. Drive-alone mode share will decrease from 44.7 percent in 2012 to 38.6 percent in 2050. (2021 Regional Plan, Appendix T, Table T6.2.)

The Plan will increase the miles of transit service, including commuter rail, light rail transit, rapid, and bus services, from 94,410 miles in 2016 to 263,005 miles in 2050, an increase of 278 percent. Mileage of high-occupancy vehicle (HOV) and Managed Lanes will also increase from 116 miles in 2016 to 821 miles in 2050, an increase of over 700 percent. Mileage of bicycle facilities will increase from 3,112 miles in 2016 to 3,631.7 miles in 2050, an increase of 16.7 percent. (Final EIR Section 4.16, Transportation.)

Compared to 380,540 daily transit boardings per day in 2016, the Plan will more than triple the amount of daily regional transit boardings to 1,235,770 by 2035, with a further increase to 1,440,963 daily boardings by 2050 (2021 Regional Plan, Appendix T, Table T6.2).

Safety and Physical Activity Benefits

The Plan would upgrade several miles of unprotected bike facilities, specifically 18.1 lane miles of Class III Bike Routes and 66.6 lane miles of Class II Bike lanes, to protected bicycle facilities such as Class I – Multi-Use Pathways and Class IV Cycle Tracks. Upgrading from unprotected to protected facilities would increase cyclist safety. (Final EIR Section 4.16, Transportation.)

Engagement in transportation-related physical activity will increase under the Plan. Average daily bicycle trips and pedestrian trips will increase by 256 percent and 80 percent, respectively, between 2016 and 2050. (Final EIR Section 4.16, Transportation.)
Time engaged in transportation-related physical activity will increase on a per capita basis from 7.39 minutes per day in 2016 to 13.22 minutes per day. In addition, only 11.4 percent of the population engaged in 20 minutes or more of transportation-related physical activity in 2016; under the Plan, this percentage is expected to increase to 20.7 percent. (2021 Regional Plan, Appendix T, Table T6.2.)
SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN

STATE CLEARINGHOUSE NO. 2010041061

MITIGATION MONITORING AND REPORTING PROGRAM

PREPARED FOR:

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November 2021
PURPOSE AND INTENDED USE OF THE MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that an agency adopt a Mitigation Monitoring and Reporting Program (MMRP) prior to approving a project that includes mitigation measures. This MMRP has been prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the CEQA Guidelines.

The purpose of this MMRP is to ensure the mitigation measures adopted in the findings of fact for San Diego Forward: The 2021 Regional Plan (Regional Plan) are implemented, in accordance with CEQA requirements. The Regional Plan Environmental Impact Report (EIR) findings adopt feasible mitigation measures to reduce the significant environmental impacts of the Regional Plan. This MMRP clarifies the process for the San Diego Association of Governments (SANDAG) and Implementation Agencies to ensure these mitigation measures are implemented, and designates responsibility for implementing, monitoring, and reporting mitigation.

Several of the adopted EIR mitigation measures are plan-level measures that will be implemented by SANDAG. Many of the adopted mitigation measures are programmatic mitigation measures that shall be implemented by SANDAG and can and should be implemented by other agencies during future project-specific design and environmental review.

For second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used. Where SANDAG acts as a pass-through agency for funding, it is the funding agency’s responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded. The MMRP for the Program EIR may be used as a tool for incorporating mitigation measures into future second-tier projects, as provided for in CEQA Guidelines Section 15168(c)(3).

In addition, Senate Bill (SB) 375 provides specific CEQA streamlining for residential/mixed-use projects and transportation priority projects (TPPs) if they incorporate mitigation measures from an SB 375 compliant Regional Transportation Plan (RTP) EIR. To take advantage of these CEQA streamlining opportunities, implementing agencies may use this MMRP as a tool for incorporating mitigation measures in their future residential/mixed use projects and TPPs.

MITIGATION MEASURES ADOPTED WITH THE REGIONAL PLAN

Mitigation measures adopted in the Regional Plan EIR findings are included in Attachment A, which identifies:

- The content of the mitigation measure
- The timing of implementation:
  - Planning and Project Design
  - Grading/Construction
  - Post Construction
Ongoing

The responsible party:

- SANDAG
- Other Transportation Project Sponsors – Transportation or other governmental agencies, including the California Department of Transportation (Caltrans), transit districts, cities, and the County of San Diego, responsible for implementing local or regional transportation network improvements
- Land Use – Land use agencies, including cities and the County of San Diego, and special districts such as water service providers, responsible for discretionary actions involved in land use and associated infrastructure projects and planning

ENFORCEMENT

CEQA requires mitigation measures to be “fully enforceable” through the use of permit conditions, agreements, or other measures within each Lead Agency’s authority (Public Resources Code 21081.6(b)). Many of the adopted measures are programmatic mitigation measures that shall be implemented by SANDAG and can and should be implemented by other agencies during future project-specific design and environmental review. The Lead Agency for each future project is responsible for assuring the project-specific mitigation measures it adopts are enforceable.

IMPLEMENTATION AND REPORTING

SANDAG shall designate a staff person to serve as coordinator for overall implementation and administration of this Mitigation Monitoring and Reporting Program and for its application to future projects in which SANDAG is the Lead Agency. This person (Coordinator) will also ensure that when SANDAG is the direct source of funding for transportation network improvement projects, SANDAG will require as a grant condition the implementation of those Regional Plan mitigation measures that are applicable to, and feasible for, the project type being funded.

MITIGATION MONITORING STATUS REPORTING

For those mitigation measures that SANDAG is responsible for implementing or partially implementing, reports on the progress of implementation of these measures will be prepared by staff on an annual basis. The report shall be prepared by the Coordinator and contain the following:

- A list of mitigation measures incorporated into second-tier environmental documents;
- Recommendations for modifications to the Mitigation and Monitoring Program to improve effectiveness; and
- Required modifications to the Mitigation Monitoring and Reporting Program to comply with legislation and policies adopted in the previous year (e.g., newly listed threatened species).

Implementing Agencies for second-tier projects will be responsible for developing their own processes for mitigation monitoring status reporting.
### Mitigation Measure

<table>
<thead>
<tr>
<th>Aesthetics and Visual Resources</th>
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<tbody>
<tr>
<td><strong>AES-1a Protect Public Views of Scenic Vistas for Transportation Network Improvements.</strong></td>
</tr>
<tr>
<td>During planning, design, project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, ensure that projects protect public views of scenic vistas. Construction and operational measures include, but are not limited to, the following:</td>
</tr>
<tr>
<td>- Site construction staging areas away from scenic vistas. Where infeasible, reduce the visibility of construction staging areas. Fence and screen these areas with low contrast materials consistent with the surrounding environment.</td>
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<tr>
<td>- Avoid permanent obstruction of scenic vistas from public viewing areas when selecting alignments and the grade of new infrastructure (i.e., above, at, or below grade).</td>
</tr>
<tr>
<td>- Use transparent safety barrier designs (e.g., railings) rather than walls.</td>
</tr>
<tr>
<td><strong>AES-1b Protect Public Views of Scenic Vistas for Development Projects.</strong></td>
</tr>
<tr>
<td>During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate scale and massing measures, including those listed under mitigation measure AES-1a as well as measures specific to development projects. These measures include, but are not limited to, the following:</td>
</tr>
<tr>
<td>- Ensure building siting, height, and mass protect views of scenic vistas.</td>
</tr>
<tr>
<td>- Design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.</td>
</tr>
<tr>
<td>- Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the scenic vista. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.</td>
</tr>
</tbody>
</table>
### Mitigation Measure

- Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:
  - Creative site planning.
  - Integration of natural features into the project.
  - Appropriate scale, materials, and design to complement the surrounding natural landscape.
  - Minimal disturbance of topography.
  - Clustering of development to preserve a balance of open space vistas, natural features, and community character.
  - Creation of contiguous open space network.

### AES-2a Reduce Impacts on Scenic Resources within a State Scenic Highway and Local Scenic Resources for Transportation Network Improvements.

During planning, design, and project-level CEQA review of transportation network improvements within eligible or designated state scenic highways and local scenic resources, SANDAG shall, and other transportation project sponsors can and should, ensure that projects are designed to minimize damage to scenic resources. The following measures would reduce the significant effects related to damage of scenic resources within a state scenic highway or other scenic resource or a local scenic route that are in the jurisdiction and responsibility of Caltrans or other public agencies. Where a project has the potential for significant effects, mitigation measures shall ensure compliance with regulations for Caltrans scenic vistas, requirements of the Coastal Act, and policies within county and city general plans. Such measures may include the following:

- Use a palette of colors, textures, and building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
- Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.

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<th>Mitigation Measure</th>
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<tr>
<td></td>
<td>Planning/Design/CEQA Review</td>
<td>Grading/Construction</td>
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<tr>
<td>AES-2a</td>
<td>X</td>
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San Diego Forward: The 2021 Regional Plan
Final Program Environmental Impact Report

MMRP-2
November 2021
ICF 396.18

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### AES-2b Reduce Impacts on Scenic Resources within a State Scenic Highway and Local Scenic Resources for Development Projects.

During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate measures that ensure that projects are designed to reduce impacts on scenic resources within eligible and designated state scenic highways, coastal areas, and local scenic resources. Measures include, but are not limited to, the following:

- Avoid damaging, moving, or removing trees, rock outcroppings, historic structures, and other scenic resources from eligible or designated state scenic highway corridors and local scenic resources and public viewsheds, where those scenic resources are relevant to the designation or eligibility for designation as a state scenic highway or are identified as a protected visual resource in local plans. For projects within or adjacent to designated or eligible state scenic highway corridors, and local scenic resources and

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<td>Planning/Design/CEQA Review</td>
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<tr>
<td>Use alternating façades to “break up” large façades and provide visual interest.</td>
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<td>Design new corridor landscaping to respect existing natural and human-made features and to complement the dominant landscaping of the surrounding areas.</td>
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<td>Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.</td>
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<td>Retain or replace trees bordering highways, so that clear-cutting is not evident.</td>
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<tr>
<td>Provide new corridor landscaping that provides appropriate transition to existing natural and human-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.</td>
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<tr>
<td>Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.</td>
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<tr>
<td>Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.</td>
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Mitigation Measure | Planning/Design/ CEQA Review | Grading/ Construction | Post-Construction | Ongoing | Responsible Party | Transportation Project Sponsor | Land Use Agency/ Special District
---|---|---|---|---|---|---|---
Mitigation Measure: public viewsheds identified in local approved plans, prior to project approval, complete visual resources studies. If a significant impact on scenic resources is identified, the study would require site-specific mitigation measures, which may include those identified below.
- Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, and site grading.
- Ensure vegetation used as screening and landscaping blends in and complements the natural landscape.
- Retain or replace trees within scenic resources so that clear-cutting is not evident.
- Ensure grading blends with the adjacent landforms and topography.
- Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.

AES-3a Reduce Impacts on Visual Character for Transportation Network Improvements.
During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, incorporate measures that ensure that projects are designed to reduce significant impacts on visual character. Measures include, but are not limited to, the following:
- Use contour grading to match surrounding terrain and existing natural, and human-made features of the area.
- Revegetate graded slopes and exposed earth surfaces prior to completion of construction.
- Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.
- Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements
## AES-3b Reduce Impacts on Visual Character for Development Projects.

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

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

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<tr>
<td>AES-3b Reduced Impacts on Visual Character for Development Projects</td>
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## AES-4a Minimize Effects of Light and Glare for Transportation Network Improvements.

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

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<td>AES-4a Minimize Effects of Light and Glare for Transportation Network Improvements</td>
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<td>SANDAG</td>
<td>Transportation Project Sponsor</td>
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Where SANDAG and other transportation project sponsors have identified that a project has the potential for significant effects, they can and should adopt mitigation measures to ensure consistency with the goals and policies within county and city general plans, as applicable. Construction and operational measures include, but are not limited to, the following:

- Minimize and control glare from transportation projects through the adoption of project design features that reduce glare, such as those listed below:
  - Planting trees along transportation corridors to reduce glare from the sun.
  - Landscaping off-street parking areas, loading areas, and service areas.
  - Limiting the use of reflective materials, such as metal.
  - Using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry.
  - Screening parking areas by using vegetation or trees.
  - Using low-reflective glass.

- Impose lighting standards that ensure that minimum safety and security needs are addressed and minimize light trespass and glare associated with transportation network improvements. These standards include the following:
  - Minimizing incidental spillover of light onto adjacent private properties and undeveloped open space.
  - Directing luminaries away from habitat and open space areas adjacent to the project site.
  - Installing luminaries that provide good color rendering and natural light qualities.
  - Minimizing the potential for back scatter into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.

AES-4b Minimize Effects of Light and Glare for Development Projects.
During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should

| AES-4b Minimize Effects of Light and Glare for Development Projects. | X | X | X | X | X |
### Mitigation Measure

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- Ensure that projects avoid or minimize the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas. Where a project has the potential for significant effects, mitigation measures shall ensure consistency with the goals and policies within county and city general plans, as applicable. Such measures may include, but are not limited to, the following:
  - Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
  - Restrict the operation of outdoor lighting for construction from the hours of 7:00 p.m. to 7:00 a.m.
  - Use high pressure sodium vapor and/or cut-off fixtures including LED lights, instead of typical mercury-vapor fixtures for outdoor lighting.
  - Use unidirectional lighting to avoid light trespass onto adjacent properties.
  - Provide structural and/or vegetative screening from light-sensitive uses.
  - Shield and direct all new street and pedestrian lighting away from light-sensitive offsite uses.
  - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.

### Agricultural and Forestry Resources

**AG-1a Preserve Existing Agricultural Lands.**

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

- Acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same
### Mitigation Measure

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

#### AG-1b Reduce Transportation Network Improvement and Development Conflicts with Agricultural Operations.

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

- Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, topographic features, and open space, and to reduce conflict between transportation network improvements and/or developments and farming.
- Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
**Mitigation Measure**

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<td>Transportation Project Sponsor</td>
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- Align corridors, incorporate buffer zones and setbacks, and design berms and fencing to avoid agricultural lands and to reduce conflicts between transportation projects and agricultural lands.

**FR-1 Reduce Impacts on Forest Lands.**

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

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

**Air Quality**

**AQ-2a. Secure Incentive Funding.**

SANDAG, in partnership with SDAPCD and the Port of San Diego, and member cities, will seek to secure incentive funding to reduce mobile SO\(_x\) and PM emissions from mobile exhaust, and entrained PM sources such as tire wear, brake wear, and re-entrained road dust. Such incentive funding or programs are:

- Voucher Incentive Program (VIP)
- Vehicle Registration Fund Program (VRF)
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<tr>
<td>• Lower Emission School Bus Replacement and Retrofit Program (LESB)</td>
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<tr>
<td>• American Recovery and Reinvestment Act funding for the National Clean Diesel Funding Assistance Program (ARRA)</td>
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<tr>
<td><strong>AQ-2b. Zero Emission Trains.</strong> SANDAG shall only purchase zero emission trains on any new rail lines or train equipment after 2035. Zero emission trains can include fully electric, battery-electric, hydrogen fuel cell, or any technology that results in no tailpipe emissions. New rail lines construction after 2035 shall be powered completely by zero emission trains</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><strong>AQ-3a Implement Construction Best Management Practices for Fugitive Dust.</strong> During planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential for localized particulate (PM10 and PM2.5) impacts that result in exceedances of the CAAQS or NAAQS using applicable procedures and guidelines for such analyses (for example, SDAPCD and EPA air dispersion modeling guidance). If impacts are significant, during project-level construction, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement best management practices (BMPs) to reduce impacts, including but not limited to, the following: • Use fugitive dust control measures to reduce generation from exposed surfaces during construction, as specified in SDAPCD Rule 55 (SDAPCD 2009). SDAPCD Rule 55 includes various requirements, including preventing visible dust beyond the property line for more than 3 minutes in any 60-minute period, applying dust suppressants, removing all track-out/carry-out dust at the conclusion of each work day. Compliance with these regulatory requirements is a performance standard for mitigation of construction activity particulate emissions. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out to 90 percent for use of tarp or cargo covering when transporting material (SCAQMD 2007, WRAP 2006).</td>
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<td>Use additional fugitive dust control measures such as watering or application of dust suppressants to reduce the generation of fugitive dust at active construction sites. Reductions in fugitive dust emissions range from 10 to 74 percent for watering of unpaved surfaces to 84 percent for use of dust suppressants (WRAP 2006).</td>
<td>X</td>
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<tr>
<td>Implement controls on haul trucks to reduce emissions from haul trucks transporting soil, sand, or other loose material off site. Reductions in fugitive dust emissions are estimated at 91 percent for use of tarps or cargo covering when transporting material (SCAQMD 2007).</td>
<td>X</td>
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<tr>
<td>Remove visible mud or dirt track-out onto adjacent public roads. Reductions in fugitive dust emissions range from 40 to 80 percent for minimizing track-out (WRAP 2006).</td>
<td>X</td>
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<tr>
<td>Limit vehicle speeds on unpaved surfaces during construction to 15 mph. Reductions in fugitive dust emissions from unpaved surfaces are estimated at 57 percent (WRAP 2006).</td>
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<tr>
<td>Suspend excavation, grading, and/or demolition activities when average wind speeds exceed 20 mph. Reductions in fugitive dust emissions are estimated at 98 percent (WRAP 2006).</td>
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</tr>
<tr>
<td>Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas. Reductions in fugitive dust emissions from wind erosion are estimated at 90 percent (WRAP 2006).</td>
<td>X</td>
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</tr>
<tr>
<td>Wash all trucks and equipment, including their tires, prior to leaving the construction site. No quantitative estimate of the effectiveness of this measure is available.</td>
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<tr>
<td>Implement other site-specific fugitive dust control measures as warranted for individual construction projects for the transportation network and/or land use projects.</td>
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**AQ-3b Reduce Diesel Emissions During Construction From Off-Road Equipment.** For impacts on air quality from construction exhaust, during planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs

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to reduce criteria pollutant and TAC impacts from off-road equipment, including, but not limited to, the following:

- Ensure off-road equipment greater than 25 horsepower (hp) that will be operating for more than 20 hours during construction meets the following requirements:
  - Ensure engines are zero emissions or equipped with an CARB Level 3 Verified Diesel Emissions Control Strategy, if available for the equipment being used, unless the equipment meets EPA Tier 4 emission standards.
  - If project-specific analysis demonstrates that the above measure would not adequately reduce impacts (as determined by the project-level lead agency), provide engines that meet or exceed either EPA Tier 4 off-road standards.
- Monitor idling time of diesel-powered construction equipment and limit to no more than 2 minutes.
- Maintain and properly tune construction equipment in accordance with the manufacturers’ specifications.
- Prohibit portable diesel generators and use grid power when it is available. Use propane or natural gas generators when grid power electricity is not feasible.
- Use late model engines.
- Use low emission diesel products.
- Use alternative fuels in construction equipment.
- Use engine retrofit technology to control emissions from off-road equipment.

### AQ-3c Reduce Diesel Emissions During Construction From On-Road Vehicles.

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

- Monitor idling time of diesel-powered trucks, and limit to no more than 2 minutes.
- Provide clear signage for construction workers at all access points.
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<td>• Maintain and properly tune vehicles in accordance with the manufacturers’</td>
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<td>• Ensure that construction activity deliveries are scheduled during off-peak</td>
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<td>hours (e.g., 10 a.m. to 3 p.m.) and are coordinated to consolidate truck trips.</td>
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<td>When the movement of construction materials and/or equipment impacts traffic</td>
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<td>flow, provide temporary traffic control (e.g., flag person) to improve traffic</td>
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<td>• Use late model engines (2010 or new model years).</td>
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<td>• Use low emission diesel products in on-road vehicles.</td>
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**AQ-4 Reduce Exposure to Localized Particulate Emissions.**

During planning, design, and project-level CEQA review of transportation network improvements and programs, and during planning, design, and project-level CEQA review of development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential particulate matter concentration impacts of the project using applicable procedures and guidelines for such analyses. If exceedances of PM10 or PM2.5 standards are predicted, SANDAG shall, and other transportation project sponsors can and should, apply measures to reduce PM emissions, including but not limited to the following:

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

Where adequate buffer cannot be implemented, implement the following:

- Install air filtration (as part of mechanical ventilation systems or stand-alone air cleaners) to indoor reduce pollution exposure for residents and other sensitive populations in buildings that are close to transportation network improvement projects. Use air filtration devices rated MERV-13 or higher. As part of implementing this
Mitigation Measure

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<td>Measure, require an ongoing maintenance plan for the building’s Heating, Ventilation and Air Conditioning (HVAC) air filtration system. Air filtration devices rated MERV-13 are estimated to reduce indoor levels of particulates by 75 to 90 percent (CARB 2017b).</td>
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<td>• Plant trees and/or vegetation suited to trapping roadway air pollution and/or sound walls between sensitive receptors and the pollution source. This measure would trap pollution emitted from pollution sources such as freeways, reducing the amount of pollution to which residents and other sensitive populations would be exposed. The vegetation buffer should be thick, with full coverage from the ground to the top of the canopy (CARB 2017c, EPA 2016). Vegetation can be combined with sound walls to further reduce pollution exposure, particularly for locations immediately behind the barrier.</td>
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<td>• Design streets that have more open space and varied building heights.</td>
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<td>• Move bus stops and other gathering location farther from intersections.</td>
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**AQ-5a Reduce Exposure to Localized Toxic Air Contaminant Emissions.** During planning, design, and project-level CEQA review of transportation network improvements and programs, SANDAG shall, and other transportation project sponsors can and should, evaluate the potential toxic air contaminant (TAC) impacts of the project using applicable procedures and guidelines for such analyses (for example, California Air Pollution Control Officers’ Association, OEHHA, and/or EPA air toxics health risk assessment guidance). In addition, during planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should apply the above measures, and additional measures to reduce TAC emissions or exposure to TAC emissions, including but not limited to:

- Reduce the potential for TACs to be introduced into buildings by all of the following:
  - Maintaining a positive air pressure within buildings that include sensitive receptors.
  - Achieving a performance standard of at least one air exchange per hour of fresh outside filtered air.
  - Achieving a performance standard of at least 4 air exchanges per hour of recirculation.
### Mitigation Measure

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

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

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<td>occupants. This measure would reduce the potential for exposure of residents and other sensitive populations to stationary sources of TAC emissions.</td>
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<td><strong>AQ-5b. Reduce Exposure to Localized Toxic Air Contaminant Emissions during Railway Design.</strong></td>
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<td>In order to help reduce localized toxic air contaminant (TAC) concentrations at sensitive receptors near the future proposed railway(s), SANDAG shall require the design of railway tunnels or other approaches to move emissions underground, where feasible, during individual project-level design. Furthermore, individual project-level design of railway tunnels or other underground features shall require that portals, adits, windows, and other venting features are located as far away as feasibly possible from nearby sensitive receptor(s).</td>
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<td><strong>GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans.</strong> See Greenhouse Gas Emissions section for Mitigation Measure GHG-5a.</td>
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<td><strong>GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure.</strong> See Greenhouse Gas Emissions section for Mitigation Measure GHG-5b.</td>
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<td><strong>GHG-5e. Implement Measures to Reduce GHG Emissions from Transportation Projects.</strong> See Greenhouse Gas Emissions section for Mitigation Measure GHG-5e.</td>
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<td><strong>GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects.</strong> See Greenhouse Gas Emissions section for Mitigation Measure GHG-5f.</td>
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<td><strong>TRA-2. Achieve Further VMT Reductions for Transportation and Development Projects.</strong> See Transportation section for Mitigation Measure TRA-2.</td>
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<td><strong>Biological Resources</strong></td>
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<td><strong>BIO-1a. Implement Design, Minimization, and Avoidance Measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources.</strong></td>
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Final Program Environmental Impact Report

MMRP-16
November 2021
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Mitigation Measure

During project planning, design, project-level CEQA review, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid impacts on sensitive natural communities and regulated aquatic resources when feasible. Avoidance measures include, but are not limited to, the following:

- Conduct early coordination with the Wildlife Agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands.
- During the site identification and project design process, to the extent feasible, prioritize the least environmentally constrained site, and select a design that avoids and minimizes impacts on biological resources and NCCP lands, and maintains habitat integrity.
- Confine development footprints to the minimum amount of undeveloped area necessary for construction and safe, reliable operation. Limit access routes and staging areas to existing roadways, and developed or disturbed areas. Direct drainages away from sensitive habitats, such as canyons. Clearly delineate all construction areas, staging areas, and access routes in the final engineering plans.
- Limit grading and earth-moving activities to the permitted impact footprint. Install environmentally sensitive area fencing or flagging along the limits of disturbance prior to the start of construction to avoid incidental loss of sensitive habitat types.
- Require biological monitoring and regular inspections for construction in the vicinity of and adjacent to sensitive habitats to avoid impacts on these habitats. Report any special status species and natural communities detected during project surveys to the CNDDB.

**BIO-1b Provide Compensatory Mitigation.**

Where impacts are unavoidable, during project planning, design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation, as specified by and consistent with adopted MSCP or MHCP guidelines and agreements, applicable federal and

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<p>| BIO-1b Provide Compensatory Mitigation. | X | X | X | X |</p>
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<td>State regulatory requirements for mitigating impacts on regulated aquatic resources,</td>
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<td>applicable local regulations protecting sensitive natural communities, or through</td>
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<td>consultation with resource agencies. SANDAG shall, and other implementing agencies</td>
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<td>can and should, establish appropriate mitigation ratios where ratios have not already</td>
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<td>been established through ordinances and guidelines, specifically for impacts on</td>
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<td>sensitive coastal, riparian, and shrubland communities. SANDAG shall, and other</td>
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<td>implementing agencies can and should, design compensatory mitigation to result in the</td>
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<td>conservation, establishment, or creation of self-sustaining sensitive natural and</td>
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<td>native communities, replacing the lost habitat and/or habitat value as required to</td>
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<td>offset those lost from project implementation. Otherwise, mitigation measures would</td>
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<td>include the requirement for and financing of long-term conservation and management</td>
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<td>requirements of the mitigation projects.</td>
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Sensitive Vegetation Communities

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

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

- Onsite restoration and post-restoration monitoring for temporary impacts using appropriate native species and natural habitat configurations similar to or better than those impacted.

- On- or offsite preservation of existing habitats through acquisition and/or restoration using EMP and other (e.g., project-specific) mitigation funds for permanent impacts. Protect mitigation lands in perpetuity (e.g., through a conservation easement or similar legal conservation assurance to be approved by the regulatory agencies), fund long-term management (e.g., through the establishment of an endowment for habitat management and for easement management), and adequately manage such lands to maintain the originally intended biological quality and function in perpetuity.
### Mitigation Measure

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

- Purchase of habitat credits at an approved mitigation bank, or through payment into an in-lieu mitigation fee program applicable to the impacts and as approved by the Wildlife Agencies.

**Regulated Aquatic Resources.**

Construction within regulated aquatic resources would be subject to prior authorization by USACE, RWQCB, CDFW, and CCC (as applicable in the coastal zone). Consistent with the resource agencies’ permitting and applicable adopted plans, ordinances, and policies, provide project-specific mitigation for impacts on regulated aquatic resources, including waters and wetlands, and associated state-regulated riparian habitat, through one of the following, in order of priority:

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## Mitigation Measure

- Purchase of credits at an existing authorized mitigation bank or in lieu fee program, except within the coastal zone. Provide compensatory mitigation for impacts inside the coastal zone at sites within the coastal zone close to the impact. Mitigation of impacts on aquatic resources within the coastal zone may require offsets outside the coastal zone and would be negotiated with the CCC on a case-by-case basis.

- Project-specific (permittee responsible) mitigation. Apply an appropriate mitigation ratio for regulated aquatic resources in consultation with the regulatory agencies (i.e., following the USACE Standard Operating Procedure and any other applicable standards) to ensure no net loss of wetlands functions and services, account for temporal losses, and set in coordination with USACE, RWQCB and CDFW. Impacts on vernal pools within the City of San Diego would require mitigation consistent with the VPHCP (City of San Diego 2017); impacts on vernal pools outside the City of San Diego would require permitting through the RWQCB.

### BIO-1c Prepare a Habitat Restoration Plan.

During planning, design, and project-level CEQA review of transportation network improvements or development projects, and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—as specified through consultation with and as approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a habitat restoration plan for impacts on sensitive natural communities or a Habitat Mitigation and Monitoring Plan (HMMP) consistent with the requirements of and approved by USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands. This mitigation measure applies provided that mitigation does
not occur through credit purchase at a mitigation bank. The restoration plan should include the following:

- Details regarding the location of the site, site conditions and functions, site preparation (e.g., grading, bio-engineering methods), recontouring, planting specifications (including native seed mixes and plant palettes), irrigation design (if determined necessary), and measures to control exotic vegetation.

- Details on avoidance of impacts on any extant sensitive biological resources that may occur as the result of habitat restoration, including direct loss and indirect effects related to changes in hydrology and associated potential effects on species composition.

- Identification of locally appropriate plant species for the plan, sourcing (e.g., seed collection, contract-growing of container plants), and outline of performance standards (success criteria). Success should be measured by comparing a similar, natural (undisturbed) reference site containing the same vegetation communities and located within the same watershed as the restoration site, and should use statistical metrics in consideration of the temporal difference between an established reference site and an immature restoration site.

- Performance standards sufficient to create self-sustaining habitat providing the functions and values required to offset those lost to the impacts and meet the requirements of applicable agency and adopted plans, ordinances, and policies. After final performance standards have been met and any relevant permitting agencies have approved the mitigation project as complete, the mitigation areas must be conserved and managed in perpetuity (see BIO-1d).

- Maintenance and monitoring procedures (including post-restoration monitoring and reporting). Any habitat restoration and mitigation site should be monitored for a minimum of 5 years or as required by regulatory agencies, but continue maintenance and monitoring until performance standards are met.

- Identification of remedial measures if the mitigation efforts fall short of the performance standards. Remedial measures typically include, but are not limited to, replanting, reseeding, topographical/surface contour adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods.
### Mitigation Measure

- Climate science and climate change resiliency and adaptation measures, to be developed as adaptive management strategies for restoration and long-term management planning to reflect the latest available information on climate change impacts and adaptation measures, such as seed storage and adaptation of the seed mixes and planting palettes to adapt to changing climate conditions and sea-level rise.

#### BIO-1d Prepare Habitat/Long-Term Management Plans.

During project-level CEQA review of transportation network improvements or development projects and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions should—as specified through consultation with and approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and State regulatory requirements—prepare and implement a Long-Term Management Plan (LTMP) consistent with the requirements of USACE, RWQCB, and CDFW for all impacts on regulated waters, including wetlands; or a Habitat Management Plan (HMP) or Resources Management Plan (RMP) for upland mitigation areas. The management plans can and should be consistent with the SDMMP MSP (SDMMP 2017), be prepared by qualified and experienced ecologists to develop appropriate management and monitoring measures, describe management in perpetuity of the mitigation and conservation areas, illustrate adaptive management measures (Atkinson et al. 2004), outline management goals and objectives, and identify management tasks pursuant to these goals and objectives. Management goals should include adaptive management measures for climate adaptation and resiliency. Furthermore, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, prepare a management cost analysis to identify long-term management costs pursuant to measures outlined in the LTMP, HMP, or RMP. Long-term management should be funded using endowments or other financial assurances to generate sufficient annual interest to manage mitigation areas in perpetuity. In addition to the funding requirements, the management plans should also identify the habitat manager and propose a site protection instrument, such as an agency-approved Conservation Easement (CE), restrictive covenant or other title status.

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

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

**BIO-2a Implement Design, Minimization, and Avoidance Measures for Special-Status Animal Species.** During planning, design, project-level CEQA review, regulatory permitting process, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the
### Mitigation Measure

County of San Diego, cities, and other local jurisdictions can and should, incorporate measures to avoid and minimize impacts on special-status animal species.

**Construction**

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

- **Avoid** construction during the nesting or breeding season of special-status animal species.
- **If** the nesting or breeding season cannot be avoided, conduct focused surveys (by certified biologists approved by the Wildlife Agencies) and implement noise attenuation measures (e.g., temporary noise barriers) if construction noise levels are found by the focused survey to disturb special-status animal species, specifically during the breeding season.
- **Backfill** all wildlife pitfalls (trenches, bores, and other excavations) at the end of each work day. If backfilling is not feasible, slope all trenches, bores, and other excavations at a 3:1 ratio at the ends to provide wildlife escape ramps, or cover completely to prevent wildlife access.
- **Delineate** permitted work areas, including staging areas, equipment access, and placement of soils, with fencing or stakes prior to construction to prevent access to areas occupied by special-status species.
- **Require** monitoring of construction activities by qualified or certified biologists when construction occurs in, or adjacent to (i.e., within buffer areas approved by the regulatory agencies), areas suitable for or occupied by special-status species, with authority to stop work if it deviates from approved plans and mitigation measures. Avoidance buffers may vary by species and should be approved by the Wildlife Agencies.
- **Avoid** nighttime construction or minimize lighting. When activities must occur at night, direct lighting (e.g., staging areas, equipment storage sites, roadway) downward and away from sensitive vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.

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- **SANDAG**
- **Transportation Project Sponsor**
- **Land Use Agency/Special District**
Mitigation Measure

- Remove spoils, trash, or any debris to an offsite, approved disposal facility. Contain trash and food items in closed containers and remove daily to reduce the attractiveness to opportunistic predators such as coyotes and feral dogs and cats that may prey on sensitive species. Prohibit workers from bringing pets and firearms to the site.
- Clear vegetation outside of the typical breeding season of special-status animal species as determined by the Wildlife Agencies or qualified biologist. If activities must occur during special-status species breeding season timeframes, conduct a preconstruction survey by a qualified biologist to determine whether the species of concern, including special-status birds protected under the MBTA, are present within the proposed work area or appropriate buffer (buffer distance may vary depending on the type of activity and the species and other site conditions). If the species of concern are found on site, implement measures, surveys, and construction monitoring to avoid impacts as determined by the regulatory agencies and/or the qualified biologist.

Operation and Maintenance

Operation and maintenance measures include, but are not limited to, the following:
- If permanent lighting is necessary, use motion sensitive lighting rather than steady burning, and direct downward and away from natural vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.
- In the event that vegetation clearing or other vegetation maintenance is required, schedule vegetation clearing outside special-status animal species breeding seasons.
- Implement operational noise reduction measures described in Section 4.13, Noise and Vibration (see mitigation measure N-1a).

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

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Operation and Maintenance

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

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

consistent with adopted MSCP or MHCP guidelines and agreements, federal and State regulatory requirements, or local regulations.

_Federally and/or State-Listed Plant Species_

- If an individual project would result in take of a federally and/or state-listed plant species, consult with the Wildlife Agencies and/or require the applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, NCCP, Section 7, Section 10 HCP) prior to construction as required by State and federal law. Federally listed plant species may not fall under this requirement if no federal project nexus is provided. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines.
- Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts.
- Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat, including, but not limited to, seed collection, salvage of root masses, translocation of transplantation of populations or plant parts, and planting seeds and/or root masses in an area with suitable conditions as approved by the Wildlife Agencies or authorized jurisdiction. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.
- Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.
### Mitigation Measure

- Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, replanting and reseeding of appropriate habitat elements, and propagation and seed bulking programs.
- Conserve any restoration and translocation sites in perpetuity, fund a long-term management endowment, identify a long-term habitat manager, and provide long-term adaptive habitat management measures through a Habitat Management Plan.

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

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

### BIO-2c Provide Compensatory Mitigation for Special-Status Animal Species

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

### Federally and/or State Listed Animal Species

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### Mitigation Measure

- If an individual project would result in take of a federally and/or state-listed animal species, consult with the Wildlife Agencies and/or require the project applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, Section 7, NCCP, HCP) prior to construction as required by State and federal law. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines. As identified through the appropriate take authorizations, develop mitigation plans and long-term conservation and management strategies, as required and approved by the Wildlife Agencies.

- Mitigate loss of habitat through open space conservation, using mitigation banks (as available) or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat following the most recent scientific information and guidance available.

- Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted NCCP plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts.

- Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat based on available scientific information and as recommended by the respective species experts. If appropriate and approved by the regulatory agencies, mitigation may include translocation (active or passive) of the species. Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.

- Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.

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| ⚫ If an individual project would result in take of a federally and/or state-listed animal species, consult with the Wildlife Agencies and/or require the project applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, Section 7, NCCP, HCP) prior to construction as required by State and federal law. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation pursuant to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines. As identified through the appropriate take authorizations, develop mitigation plans and long-term conservation and management strategies, as required and approved by the Wildlife Agencies. |
| ⚫ Mitigate loss of habitat through open space conservation, using mitigation banks (as available) or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat following the most recent scientific information and guidance available. |
| ⚫ Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted NCCP plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in lieu fee program to compensate for impacts. |
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| ⚫ Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program. |
Mitigation Measure

- Design remedial measures appropriate for the species and habitat. Appropriate remedial measures include, but are not limited to, exotic species management, access control, habitat restoration, and predator control programs.

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

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

**BIO-3 Facilitate Wildlife Movement.**

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

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

- Maintain undercrossings and/or other crossing structures as needed to ensure wildlife movement. Prepare a fencing and wildlife crossing structure maintenance plan for projects with edge effects to maintain permeability for wildlife across corridors.

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

The inclusion of the above design features should result in an equal or net-benefit to wildlife movement compared to existing conditions.

In addition, pursuant to the California Ecosystems Protection Act (AB 1788), ban the use of anticoagulant rodenticides near open space, conserved lands and areas identified as
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core, linkages, wildlife corridors, or other connectivity areas. The use of anticoagulant rodenticides causes secondary poisoning in predators and may contribute to reduced functional connectivity in an already constrained landscape.

Cultural Resources

CULT-1a Develop Project-Level Measures for Development Projects and Transportation Network Improvements.

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

Archaeological Resources

- Where feasible, avoid impacts on archaeological resources by preservation in place by:
  - Avoiding archaeological sites
  - Deeding archaeological sites into permanent conservation easements
  - Capping or covering archaeological sites with a layer of soil before building on the sites
### Mitigation Measure

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- If preservation in place is not feasible, reduce impacts on archaeological sites by completing a data recovery program conducted in compliance with CEQA Guidelines Section 15126.4(b). (A data recovery program for archaeological sites consists of excavation of a percentage of the site—determined in consultation with the lead agency—to provide information necessary to answer significant research questions.)

### Historic Architectural Resources

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

### CULT-1b Implement Monitoring and Data Recovery Programs for Development Projects and Transportation Network Improvements.

During project-level CEQA review and during construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should, or during construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, implement monitoring and data recovery measures to reduce impacts on both known and undiscovered CEQA-defined historical resources and unique archaeological resources, including but not limited to the following:

- X
- X
- X
- X
- X
- X
### Mitigation Measure

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

### Energy

Mitigation measures are not required.

### Geology and Soils

**PALEO-1a Identify the Potential for Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements.**

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

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

- Prepare a paleontological monitoring and mitigation plan, which will outline where monitoring should occur and procedures for discoveries, consistent with applicable regulations and guidelines. Such regulatory standards include the Antiquities Act of 1906, PRPA, and Public Resources Code requirements; regional and local policies of San Diego County and the cities of Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, Escondido, La Mesa, Lemon Grove, National City, Oceanside, San Diego, San Marcos, Santee, Solana Beach, and Vista; and guidelines of other transportation project sponsors such as the California Department of Transportation’s Standard Environmental Reference, Environmental Handbook: Volume 1: Guidance for Compliance, Chapter 8: Paleontology (Caltrans 2014).
Mitigation Measure

- Establish procedures for monitoring and the possible preconstruction salvage of exposed unique resources if fossil-bearing rocks or unique geologic features have the potential to be affected.
- Provide preconstruction coordination with contractors.
- Be on site to observe during grading operations and oversee original cutting in previously undisturbed areas of sensitive geologic formations, temporarily halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, recover scientifically valuable specimens or ensure avoidance of the unique paleontological resource or unique geologic feature, and oversee fossil salvage operations and reporting.

Greenhouse Gas Emissions

**GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans.**

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

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

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Final Program Environmental Impact Report
MMRP-37
November 2021
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<td>CEQA Review</td>
<td>Transportation</td>
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<td>Special District</td>
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</table>

To be eligible for grant funding, local jurisdictions would be required to have a CAP or GHG reduction plan adopted by the agency's elected decision-making body. Applicants shall provide sufficient evidence in their funding proposals demonstrating, to SANDAG’s satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding.

Applications shall include estimated GHG emissions reductions from the project, which shall be prepared using established methods or protocols and shall be reviewed and approved by SANDAG. The grant program(s) shall be structured (e.g., using evaluation criteria and/or weighting of evaluation criteria) to prioritize the allocation of funds to projects based on the amount of measurable progress they achieve towards achieving the GHG emissions reductions targets identified in that jurisdiction’s adopted CAP or GHG reduction plan.

Prior to December 2023, as part of next cycle of the TransNet Smart Growth Incentive and Active Transportation Grant Programs Smart Growth Incentive Program SANDAG shall:

1. continue to require locally adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and
2. make funding available for local jurisdictions to prepare and update CAPs and GHG reduction plans that keep pace with future longer-term State targets and goals for GHG emissions reductions. Any new or updated CAP or GHG reduction plan receiving funding through this program shall also meet the following minimum criteria:

- The CAP or GHG reduction plan shall be adopted by the jurisdiction’s elected decision-making body.
- The CAP or GHG reduction plan shall establish a locally appropriate 2030 GHG reduction target for communitywide GHG emissions derived from the State’s legislative target for 2030 (as established by SB 32 or as amended by future legislation), and should establish long-term targets.
- The CAP or GHG reduction plan shall quantify, using substantial evidence, how local GHG reduction strategies, programs, and measures would meet or exceed the local GHG reduction target.
• The CAP or GHG reduction plan shall establish a mechanism to monitor the plan's progress toward achieving the target, including reporting data to SANDAG consistent with, and inclusion in, the Climate Action Data Portal or similar database, and a requirement to amend the plan if it is not achieving adopted goals. Sources of funding that SANDAG shall use include the grants to fund CAP implementation and the Resilient Capital Grants and Innovative Climate Solutions Program (approximately $40 million dollars) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Actions 9(b) and 9(d) in Appendix K, respectively). SANDAG shall also pursue federal and State partnerships to leverage additional dollars for these programs. SANDAG shall document and report to the SANDAG Board of Directors the activities funded by this grant program and the estimated GHG emissions reductions on an annual basis.

GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure.

SANDAG shall establish one or more new programs to allocate funding for zero-emission buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations), zero-emissions goods movement vehicles (e.g., medium- and/or heavy-duty trucks) and infrastructure, and electric micromobility (e.g., personal electric bikes, cargo delivery electric bikes, neighborhood electric vehicles) and associated infrastructure. Eligible entities could include but are not limited to public transit operators for zero-emission bus and infrastructure funding; port tenants, distributors, wholesalers, warehouse developers and/or owners, truck owners and/or operators, truck manufacturers, infrastructure providers, and any company that has a fleet of medium- and/or heavy-duty trucks for zero-emission goods movement funding; and local residents, last mile delivery services, and ride-share and/or ride-hail services for electric micromobility funding and associated infrastructure. SANDAG shall include approximately $100 million by 2025 of the Electric Vehicle Program (Table 2-13 in Chapter 2 and Near-Term Action 9[b] in Appendix K), and approximately $5 million of Transportation Demand Management funding for an electric bike incentive program (Table 2-13 in Chapter 2).
The funding for electric bikes will become available beginning in FY 2022 with the launch of a $500,000 pilot incentive program and will be expanded through FY 2025. This pilot program will reduce GHG emissions by providing funding for, at minimum, 200 electric bikes and associated services.

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

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

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

Beginning in FY 2023, SANDAG will formalize a partnership with CALeVIP San Diego County Incentive Project administrator to make available incentives for fleet charging infrastructure. Beginning in FY 2024, SANDAG will establish a vehicle incentive program...
### GHG-5c. Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere.

Beginning immediately upon adoption of the proposed Plan and prior to December 2025 (adoption of the next Regional Plan), SANDAG shall establish a Nature-Based Climate Solutions Program that will restore or enhance natural infrastructure that uses or mimics natural processes to benefit people and wildlife. Through this program SANDAG shall implement, or provide funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline conditions. Examples include, but are not limited to, restoring buried or concreted watercourses to riparian habitat to return them to more natural conditions, restoration of fallow agricultural native coastal sage scrub and chaparral, and removal of fill within salt and freshwater and restoration with wetland habitat.

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

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

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<th>Mitigation Measure</th>
<th>Implementation Timing</th>
<th>Responsible Party</th>
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<td>Planning/Design/CEQA Review</td>
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<td>SANDAG</td>
<td>TRANSPORTATION PROJECT SPONSOR</td>
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<td>that allocates funding incentives for public and private fleet vehicles. This program will reduce GHG emissions by providing funding for a minimum of 5,000 light-duty vehicles and/or chargers. To further support this mitigation measure, SANDAG shall also participate in federal and State processes to support transportation electrification as well as pursue federal, State, and local partnerships to leverage additional dollars for these programs.</td>
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<td>Mitigation Measure</td>
<td>Implementation Timing</td>
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<td></td>
<td>Planning/Design/CEQA Review</td>
<td>Grading/Construction</td>
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<tr>
<td><strong>GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide.</strong></td>
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<td>Subsequent to adoption of the proposed Plan and prior to January 2023, SANDAG shall adopt a Regional Digital Equity Strategy and Action Plan that identifies and addresses gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). Access to broadband service allows for remote education, telemedicine, work from home, and the potential for other remote access opportunities that reduce car travel and the associated GHG emissions. Investment in reliable technology and high-speed connectivity are critical to close the digital divide and the foundation of Smart Cities efforts to become more efficient, use less resources and reduce GHG. The Action Plan will identify specific actions, responsible parties, and a timeline for implementing the strategies identified in the Action Plan. Prior to December 2024, SANDAG commits to researching and evaluating methodologies for quantifying, where possible, the corresponding GHG reductions associated with improved access to remote services enabled by broadband (e.g., telehealth, remote work, distance learning, and other remote services). SANDAG shall implement the Next OS (approximately $32 million) identified in the proposed Plan (Table B-1, Page B-5 in Appendix K) to fund projects that advance Smart Cities efforts and close the digital divide. SANDAG shall also participate in federal and State processes to support projects that increase access to broadband infrastructure, as well as pursue federal, State, and private partnerships to leverage additional dollars for these programs. SANDAG shall document SANDAG’s funding expenditures and progress on implementing the Action Plan and provide a report to the SANDAG Board on an annual basis.</td>
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<tr>
<td><strong>GHG-5e. Implement Measures to Reduce GHG Emissions from Transportation Projects.</strong></td>
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<td>During the planning, design, project-level CEQA review, construction, operation, and maintenance of transportation network improvements, SANDAG shall, and transportation project sponsors can and should, implement measures to reduce GHG emissions and habitat. SANDAG shall also pursue federal and State partnerships to leverage additional dollars for this program.</td>
<td>X</td>
<td>X</td>
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</table>
achieve zero-net energy, including but not limited to applicable transportation project measures from the California Air Pollution Control Officers Association's (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010) and the Center for Resource Efficient Communities and the Center for the Built Environment’s Zero-Carbon Buildings in California Feasibility Study (Center for Resource Efficient Communities and the Center for the Built Environment 2021). GHG reduction measures include, but are not limited to, the following.

- Implement sustainable construction measures through construction bid specifications, including the following:
  - Use energy and fuel-efficient vehicles and equipment and/or use alternative fuel vehicles and equipment, where applicable.
  - Use lighting systems that are energy efficient, including light-emitting diode (LED) technology.
  - Use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements.
  - Recycle 50–75 percent of construction and demolition waste.
- Install efficient lighting (including LEDs) for traffic, street, and other outdoor lighting.
- Incorporate infrastructure electrification into project design (e.g., EV charging; charging for electric bikes) above minimum code requirements.
- Plan, design and construct all new, upgraded, and regularly maintained infrastructure with electricity demand shall demonstrate how such infrastructure will achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.
- Incorporate and increase electric vehicle charging equipment and preferred EV parking spots into projects that include commuter parking areas.
- Include design measures (e.g., curb management strategies) to accommodate flexible fleets.
- Install solar photovoltaic canopies over parking areas.
Mitigation Measure

- Design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- Design measures to reduce water consumption, such as drought-resistant landscaping, smart irrigation systems, and other measures, including those listed in mitigation measures WS-1a and WS-1b in Section 4.18, Water Supply.
- Construct buildings to Leadership in Energy and Environmental Design (LEED) certified standards or equivalent standards.
- Funding for those measures that SANDAG selects would be included in individual project budgets.

GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects.
During the planning, design, project-level CEQA review, construction, and operation of development projects, the County of San Diego and cities can and should implement measures to reduce GHG emissions and achieve zero-net energy, including but not limited to, applicable land use measures in CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010) and the Center for Resource Efficient Communities and the Center for the Built Environment’s Zero-Carbon Buildings in California Feasibility Study (Center for Resource Efficient Communities and the Center for the Built Environment 2021). These measures include, but are not limited to, the following.
- Measures that reduce VMT by increasing transit use, carpooling, bike-share and car-share programs, and active transportation, including the following:
  - Building or funding a major transit stop within or near development, in coordination with transit agencies.
  - Developing car-sharing and bike-sharing programs.
  - Providing pedestrian network improvements and a comprehensive bicycle network.
  - Providing traffic calming measures.
  - Providing transit incentives, including transit passes for Metropolitan/North County Transit District buses and trolleys.
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<tr>
<th>Mitigation Measure</th>
<th>Implementation Timing</th>
<th>Responsible Party</th>
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<td>o Consistent with the Regional Bike Plan, incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network.</td>
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<td>SANDAG</td>
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<tr>
<td>o Implementing Complete Streets consistent with the SANDAG Regional Complete Streets Policy, including adopting local Complete Streets policies.</td>
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<td>o Implementing Mobility Hubs consistent with the Regional Mobility Hub Strategy.</td>
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<tr>
<td>o Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.</td>
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<tr>
<td>o Implementing measures to increase transit use through service frequency and affordability as identified through community engagement activities, including but not limited to input from local residents, stakeholders, and Community-Based Organizations.</td>
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<tr>
<td>o Building low stress bicycle networks including bike trails and connections, lanes, paring, and end of trip facilities.</td>
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<td>o Subsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets.</td>
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<td>o Implementing employer trip reduction measures to reduce employee trips and VMT such as vanpool and carpool programs, providing end-of-trip facilities, telecommuting, teleconferencing, and alternative work schedule programs.</td>
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<td>o Incorporating ride hailing and autonomous vehicle innovations.</td>
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<td>o Including design measures (e.g., curb management strategies) to accommodate flexible fleets.</td>
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<td>o Implementing a school bus program in areas currently not served by school buses.</td>
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<td>• Measures that reduce VMT through parking strategies based on the SANDAG Regional Parking Management Toolbox, including the following:</td>
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<td>Mitigation Measure</td>
<td>Implementation Timing</td>
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<tr>
<td>o Parking pricing strategies consistent with the Toolbox.</td>
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<td>SANDAG</td>
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<td>o Reduced minimum parking requirements.</td>
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<td>Transportation</td>
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<td>o Residential parking permit programs.</td>
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<td>Project Sponsor</td>
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<tr>
<td>o Designation of a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, with adequate passenger loading and unloading for those vehicles.</td>
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<td>Land Use Agency/</td>
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<tr>
<td>o Adequate bicycle parking.</td>
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<td>Special District</td>
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<tr>
<td>o Other strategies in the SANDAG Regional Parking Management Toolbox.</td>
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<td>• Measures that reduce VMT through Transportation Systems Management (TSM), including measures included in Appendix DD of the proposed Plan.</td>
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<tr>
<td>• Land use siting and design measures that reduce GHG emissions, including the following:</td>
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<tr>
<td>o Developing on infill and brownfields sites.</td>
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<tr>
<td>o Building high density and mixed-use developments near transit.</td>
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<tr>
<td>o Developing within areas with high jobs gravity to increase destination accessibility.</td>
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<td>o Orienting development towards transit or an active transport corridor.</td>
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<td>o Retaining onsite mature trees and vegetation, and planting new trees.</td>
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<td>o Measures to plan, design, and build all new, renovated, and upgraded development and infrastructure with electricity demand to achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.</td>
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<tr>
<td>• Measures that increase vehicle efficiency or reduce the carbon content of fuels, including constructing EV charging, alternative fueling stations, or neighborhood electric vehicle networks or charging for electric bicycles consistent with SANDAG’s regional readiness planning for alternative fuels.</td>
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<tr>
<td>• Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.</td>
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**Mitigation Measure**

- Measures to reduce water consumption, including those listed in mitigation measure WS-1a and WS-1b in Section 4.18.

**AQ-3b Reduce Diesel Emissions During Construction from Off-Road Equipment.** See Air Quality section for Mitigation Measure AQ-3b.

**AQ-3c Reduce Diesel Emissions from On-Road Vehicles.** See Air Quality section for Mitigation Measure AQ-3c.

**AQ-4 Reduce Exposure to Localized Particulate and/or TAC Emissions.** See section for Mitigation Measure AQ-4.

**TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects.** See Transportation section for Mitigation Measure TRA-2.

**WS-1a Implement Water Conservation Measures for Transportation Network Improvements.** See Water Supply section for Mitigation Measure WS-1a.

**WS-1b Implement Water Conservation Measures for Development Projects.** See Water Supply section for Mitigation Measure WS-1b.

**Hazards and Hazardous Materials**

Mitigation measures are not required.

**Hydrology and Water Quality**

Mitigation measures are not required.
<table>
<thead>
<tr>
<th>Land Use and Land Use Planning</th>
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<tr>
<td><strong>LU-1 Provide Access and Connections for Transportation Network Improvements.</strong></td>
</tr>
<tr>
<td>During planning, design, and project-level CEQA review of transportation network improvements, including new rail extensions, Mobility Hubs, and roadway widening improvements, SANDAG shall, and other transportation project sponsors can and should, design new transportation network improvements within established communities to avoid the creation of barriers that physically divide such communities. Where avoidance is not feasible, measures to reduce the creation of barriers that physically divide such communities should be considered, including but not limited to, the following:</td>
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<tr>
<td>● Selecting alignments within or adjacent to existing public rights-of-way.</td>
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<td>● Designing sections above- or below-grade to avoid or reduce physical division of communities, where feasible.</td>
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<td>● Providing direct crossings, overcrossings, or undercrossings at regular intervals for various modes of travel (e.g., pedestrians/bicyclists, vehicles).</td>
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<tr>
<th>Mineral Resources</th>
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<tr>
<td><strong>MR-1a Conserve Aggregate and Mineral Resources During Planning and Design of Development Projects.</strong></td>
</tr>
<tr>
<td>During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should avoid or reduce impacts on known aggregate and mineral resources and locally important mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize direct and indirect impacts on these lands. Aggregate and mineral resource areas, especially MRZ-2 areas, should be maintained in open space or other general plan land use and zoning designations that allow for extraction of mineral resources.</td>
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<p>| <strong>MR-1b Conserve Aggregate and Mineral Resources During Planning and Design of Transportation Network Improvements.</strong> | X | X | X |
| During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, avoid loss of known aggregate and mineral resources and locally important mineral resource recovery sites, where feasible. |</p>
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<th>Mitigation Measure</th>
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<td>Planning/Design/ CEQA Review</td>
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<td>Where avoidance is infeasible, SANDAG shall, and other transportation project sponsors can and should, minimize direct and indirect impacts on the availability of known resources and recovery sites through measures that include, but are not limited to, the following:</td>
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<tr>
<td>• Designing transportation network improvements in a manner (such as buffer zones or the use of screening) that do not preclude adjacent or nearby extraction of aggregate and mineral resources following completion of the improvement and during long-term operations.</td>
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<tr>
<td><strong>Noise and Vibration</strong></td>
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<tr>
<td><strong>NOI-1a Implement Construction Noise Reduction Measures for Development Projects and Transportation Network Improvements.</strong></td>
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<tr>
<td>During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should, implement construction noise reduction measures to substantially lessen the exposure of noise-sensitive receptors to construction noise levels to achieve applicable noise standards or prevent substantial temporary increases in noise levels in the planning, design, project-level CEQA review, and construction of development projects or transportation network improvements. These measures should include, but are not limited to, the following.</td>
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<tr>
<td>• Maintain construction equipment and vehicles per manufacturers’ specifications and fit equipment with noise suppression devices (e.g., improved mufflers, equipment redesign, intake silencers, wraps, ducts, engine enclosures).</td>
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<td>• Minimize construction equipment idling when equipment is not in use.</td>
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<td>• Provide buffer zones or other techniques between stationary equipment (such as generators, compressors, rock crushers, and cement mixers) and the noise receptor.</td>
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<td>• For impact tools (e.g., jack hammers, pavement breakers, rock drills), use hydraulically or electrically powered tools; where use of pneumatic tools is unavoidable, use an</td>
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<td>Mitigation Measure</td>
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<td>Responsible Party</td>
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<td>Exhaust muffler on the compressed air exhaust. Use external jackets on the tools</td>
<td>Planning/Design/CEQA</td>
<td>SANDAG</td>
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<td>themselves. Use quieter procedures such as drills rather than impact equipment.</td>
<td>Grading/Construction</td>
<td>Transportation Project Sponsor</td>
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<td>• For rock-crushing or screening operations, place material stockpiles as a noise</td>
<td>Post-Construction</td>
<td>Land Use Agency/</td>
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<td>barrier blocking line-of-sight between the operations and receptors.</td>
<td>Ongoing</td>
<td>Special District</td>
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<td>In addition, for pile driving or other activities generating greater than 90 dBA</td>
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<td>during construction of development projects or transportation network improvements,</td>
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<td>the County of San Diego, cities, and other local jurisdictions can and should,</td>
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<tr>
<td>SANDAG shall, and other transportation project sponsors can and should, implement</td>
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<td>noise reduction measures, including but not limited to, the following.</td>
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<td>• Erect temporary noise barriers around the noise generating activities,</td>
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<td>particularly adjacent to residential buildings.</td>
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<td>• Implement “quiet” pile driving technology (such as pre-drilling of piles, the</td>
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<td>use of more than one pile driver to shorten the total pile driving duration) or</td>
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<td>vibratory pile-driving, where feasible, in consideration of geotechnical and</td>
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<td>structural requirements and conditions.</td>
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<td>• Monitor the effectiveness of noise attenuation measures by performing</td>
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<td>noise monitoring at noise-sensitive receptors during construction.</td>
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<td>⚫ NOI-1b Implement Operational Noise Reduction Measures for Transportation</td>
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<td>X</td>
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<td>Network Improvements.</td>
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<td>During the planning, design, and project-level CEQA review, and construction of</td>
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<td>transportation network improvements, SANDAG shall, and other transportation project</td>
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<tr>
<td>sponsors can and should, implement operational noise reduction measures to</td>
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<td>substantially lessen the exposure of noise-sensitive receptors to construction</td>
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<td>noise levels to achieve applicable noise standards or prevent substantial</td>
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<td>permanent increases in noise levels. These measures should include, but are not</td>
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<td>limited to, the following.</td>
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<td>• Utilize techniques such as grade separation, buffer zones, landscaped berms,</td>
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<td>dense plantings, sound walls, reduced-noise paving materials, building</td>
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<td>insulation, and traffic calming measures.</td>
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In addition, for railway projects, SANDAG shall, and other transportation project sponsors can and should, implement measures to substantially lessen noise levels to achieve FTA/FRA railway noise exposure thresholds during planning, design, and project-level CEQA review. These measures should include, but are not limited to, the following:

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

**NOI-1c Implement Operational Noise Reduction Measures for Development Projects.**

During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should implement noise reduction measures to meet local noise standards, including but not limited to, the following.

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

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

- Pre-drill pile holes within 300 feet of any sensitive receptor.
- Where feasible, use soil mix wall for excavation.
- Incorporate a comprehensive construction vibration specification into all construction bid documents.
- Require contractor to assess potential for damage to buildings within 100 feet of a tunnel boring.
- Require contractor to perform a physical survey to document existing condition of a building that might incur damage.
- If pile driving and/or other vibration-generating construction activities are to occur within 60 feet of a historic structure whose integrity would be impaired by exceeding the vibration threshold for historic structures, implement measures to reduce vibration impacts, including but not limited to, the following.
  - Retain a structural engineer or other appropriate professional to determine threshold levels of vibration and cracking that would damage any historic structure, and design construction methods to not exceed the thresholds.
  - Require groundborne vibration monitoring of nearby historic structures. Implement a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for vibration damage to historic structures.
  - Require contractor to assess potential damage to buildings within 200 feet of areas where excavation requires the use of driven piles either by impact or vibratory methods.
SANDAG shall, and other transportation project sponsors can and should, implement vibration-reducing measures to meet FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, including, but not limited to, providing special track support systems such as floating slabs, resiliently supported ties, high-resilience fasteners, and ballast mats.
In addition, rail operators can and should implement groundborne vibration and noise-reducing measures to meet applicable FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, including, but not limited to, the following.
- Conduct rail grinding on a regular basis to keep tracks smooth.
- Conduct wheel truing to re-contour wheels to provide a smooth running surface and removing wheel flats.
- To reduce groundborne noise, achieve vibration isolation of the track from underlying surface using the following.
  - Highly resilient direct fixation fasteners
  - Rail suspended fastener system
  - Isolated slab track system
  - Floating slab track system

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<th>Mitigation Measure</th>
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<td>NOI-2b</td>
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<tr>
<td>POP-2a Design Development Projects to Reduce Displacement.</td>
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<tr>
<td>During planning, design, and project-level CEQA review of land development projects, the County of San Diego, cities, and other local jurisdictions can and should develop design strategies to avoid or reduce substantial displacement of people or housing units, including affordable housing units, where consistent with overall goals to promote housing growth, including the provision of affordable housing. For development projects that would displace people or housing units, alternative designs to retain existing housing on site, alternative project site locations, and provision of replacement housing as a mitigation measure can and should be evaluated. While displacement should be considered during project evaluations, avoidance or reduction of displacement should not be employed where it would undermine achievement of housing goals, including the development of transit-oriented development and the provision of affordable housing.</td>
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<tr>
<td>POP-2b Design Transportation Network Improvement Projects to Reduce Displacement.</td>
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| SANDAG shall, and other transportation project sponsors can and should, identify feasible project alignments during planning, design, and project-level CEQA review that avoid or reduce permanent property acquisitions that would result in the substantial displacement of people or housing units. Where avoidance is not feasible, measures to reduce substantial displacement should be considered including, but not limited to, the following:  
  - Selecting alignments within existing public ROWs.  
  - Designing sections above- or below-grade to avoid property acquisition that would cause displacement of people or housing units, including affordable housing.  
  - Selecting alignments within properties that result in the least amount of displacement. For example, acquiring vacant or undeveloped portions of property rather than portions occupied by housing units.  
  - Work with local jurisdictions to identify opportunities to develop housing as part of transportation projects. |
**Mitigation Measure**

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<tr>
<th>PS-1 Implement Mitigation Measures for New/Expanded Public Service Facilities.</th>
<th>Implementation Timing</th>
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<tr>
<td>During planning, design, and project-level CEQA review of development of public facilities projects, the County of San Diego, cities, and other public service providers can and should implement mitigation measures to avoid or reduce significant environmental impacts associated with the construction of new or expanded public facilities. Mitigation measures should be implemented by public service providers directly responsible for the construction or expansion activities. Significant environmental impacts requiring mitigation may include, but are not limited to, agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, transportation, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects and transportation network improvements.</td>
<td>Planning/Design/CEQA Review: X, Grading/Construction: X</td>
<td>SANDAG: X, Transportation Project Sponsor: X, Land Use Agency/Special District: X</td>
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<tr>
<th>REC-1 Implement Mitigation Measures for Parks and other Recreational Facilities.</th>
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<td>During planning, design, and project-level CEQA review of development projects and transportation network improvements and programs, the County of San Diego, cities, and other public service providers can and should, SANDAG shall, and other transportation project sponsors can and should implement mitigation measures to avoid or reduce substantial physical deterioration of parks or other recreational facilities. Mitigation measures could include expanding or improving existing recreation facilities to accommodate additional use, or building new recreation facilities.</td>
<td>Planning/Design/CEQA Review: X, Grading/Construction: X</td>
<td>SANDAG: X, Transportation Project Sponsor: X, Land Use Agency/Special District: X</td>
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<td>During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other wastewater, stormwater, and telecommunications management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded facilities. Mitigation measures should be implemented by utilities management agencies directly responsible for the approval and implementation of these facilities.</td>
<td>Planning/Design/CEQA Review: X, Grading/Construction: X</td>
<td>SANDAG: X, Transportation Project Sponsor: X, Land Use Agency/Special District: X</td>
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<td>Mitigation Measure</td>
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<td>construction of new or expanded facilities. Significant environmental impacts requiring mitigation may include, but are not limited to, air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, traffic, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.</td>
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<tr>
<td><strong>U-1b Implement Mitigation Measures for New/Expanded Stormwater Facilities Associated with Transportation Network Improvements.</strong> During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, be required to implement stormwater BMPs during planning, design, project-level CEQA review, and project construction. Measures include, but are not limited to, implementation and construction of sand filters, bio strips, bioswales, detention basins, storage vaults, and infiltration basins, which would reduce pollutant runoff into the storm drain system.</td>
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<td><strong>U-2a Implement Mitigation Measures for New/Expanded Solid Waste Facilities.</strong> During planning, design, and project-level CEQA review of solid waste facility projects, the County of San Diego, cities, and other solid waste management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded solid waste facilities. Significant environmental impacts requiring mitigation may include, but are not limited to, air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, paleontological resources, traffic, tribal cultural resources, and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.</td>
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<tr>
<td><strong>U-2b Reduce Construction Waste.</strong> During planning, design, and project-level CEQA review, and prior to the construction or demolition of transportation network improvement projects and development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement measures to reduce construction</td>
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Mitigation Measure | Implementation Timing | Responsible Party
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### U-2c Reduce Operational Waste.

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

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

| Transportation | TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects | X | X | X | X | X | X |
## Mitigation Measure

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

- **Require TDM Strategies** – SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should require all transportation network improvements or land use development projects, that are identified to have a significant VMT-related impact, to implement feasible TDM strategies to help offset their impacts. This mitigation measure will further reduce the proposed Plan’s VMT because the potential VMT reductions associated with four TDM programs, which include pooled rides (private), vanpool, carshare, and the implementation of a regional TDM ordinance, were not incorporated into ABM2+. Strategies such as free shuttles, parking facilities for carshare, and site design features to facilitate walking, biking, and transit can and should be used by land development projects to reduce VMT-related impacts. Additional project-level TDM measures not included in the proposed Plan can and should also be used, include walking, school bus programs, school pool programs, subsidized transit passes, unbundled parking, preferential parking programs for carpools/vanpools, and bike sharing programs.

- **Reduce Parking Minimums** – The County of San Diego, cities, and other local jurisdictions can and should evaluate the feasibility of reducing their currently required parking minimums. Reducing the parking minimums for different land use types, where appropriate, can decrease project-level VMT by up to 12.5 percent (CAPCOA 2010).

- **Implement Additional Active Transportation Facilities Not Included in the Proposed Plan** – To further reduce local VMT-related impacts and take advantage of the regional bike network, SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement additional active transportation facilities that provide connections from the regional bicycle network to local neighborhoods. The proposed Plan includes funding for

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<tr>
<td>Complete Streets investments in Mobility Hub areas including implementation of bicycle and pedestrian facilities that provide local connections throughout Mobility Hub areas; however, the associated VMT reductions from this funding could not be modeled, so this mitigation measure would achieve further VMT reductions. Direct access to bicycle facilities can reduce project-related VMT by 0.65 percent, while incorporating new pedestrian facilities can reduce project VMT by up to 2 percent (CAPCOA 2010).</td>
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<td><strong>Road Diet and Traffic Calming</strong> – The County of San Diego, cities, and other local jurisdictions can and should implement road diets or other traffic calming measures within their local roadway network, where feasible, to further reduce VMT-related impacts that may be associated with land development projects or local transportation projects. Road diet and traffic calming measures would also be eligible for Complete Streets funding in Mobility Hub areas. The reduction of existing travel lanes in favor of multi-modal facilities or additional public space can help to calm and deter vehicular trips within an area or along a roadway segment. Traffic calming measures can reduce VMT by 0.5 percent (CAPCOA 2010). It should be noted that the proposed Plan includes funding, through grants, for local jurisdictions to implement road diets.</td>
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<td><strong>GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans.</strong> See Greenhouse Gas Emissions section for Mitigation Measure GHG-5a.</td>
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<td><strong>GHG-5d Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide.</strong> See Greenhouse Gas Emissions section for Mitigation Measure GHG-5d.</td>
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<td><strong>GHG-5f Implement Measures to Reduce GHG Emissions from Development Projects.</strong> See Greenhouse Gas Emissions section for Mitigation Measure GHG-5f.</td>
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<td><strong>Tribal Cultural Resources</strong></td>
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<tr>
<td><strong>TCR-1a Implement Tribal Cultural Resources Mitigation Measures for Development Projects and Transportation Network Improvements.</strong> During project-level CEQA review of development projects or transportation network improvements that would cause a substantial adverse change in the significance of a TCR,</td>
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Mitigation Measure

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the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors, can and should develop project-level protocols and mitigation measures with consulting tribes, consistent with PRC Section 21080.3.2(a) to avoid or reduce impacts on TCRs during construction and operation of development projects and transportation network improvements. The County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation projects sponsors can and should identify these resources through records searches, survey, consultation, or other means, in order to develop minimization and avoidance methods where possible, and consult with Native American tribes participating in AB 52 consultation to develop mitigation measures for TCRs that may experience substantial adverse changes.

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

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

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

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The following are standard mitigation measures for TCRs.

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

TCR-1b Implement Monitoring and Mitigation Programs for Development Projects and Transportation Network Improvements.

During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should implement monitoring and mitigation measures to reduce impacts on both known and undiscovered TCRs, during construction and operation activities, as applicable, including but not limited to the following:

- **Require TCR areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor.**
- **Should a previously undiscovered cultural resource be encountered during construction activities that is determined to be a TCR by the CEQA lead agency in consultation with Native American tribes, the qualified archaeologist, or tribal monitor if an archaeologist**
is not present, shall direct the contractor to temporarily divert all ground-disturbing activities in the area of the discovery and prepare and implement a mitigation plan consistent with standard mitigation measures set forth in PRC Section 21084.3(b), in consultation with Native American tribes.

- The qualified archaeologist shall be responsible for ensuring that all artifacts and records associated with the survey, testing, data recovery and/or monitoring of future projects are permanently curated with an appropriate regional center focused on the care, management, and use of archaeological collections. This shall be completed in consultation with the Native American representative and does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants.

- Upon completion of all ground disturbing activity, the qualified archaeologist shall prepare and submit a draft and final monitoring report to the CEQA lead agency which describes the results, analysis, and conclusions of all phases of the monitoring program, including the provisions for curation and/or repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program.

### Water Supply

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

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

**WS-1b Implement Water Conservation Measures for Development Projects.**
The County of San Diego, cities, and other local jurisdictions can and should implement feasible water conservation measures during planning, design, and project-level CEQA review of development projects, including, but not limited to, the following:
● Install drip or other water-conserving or weather-based irrigation systems for landscaping.  
● Install native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping, consistent with the most recent State, regional, and local government plans, laws, and policies.  
● Install low-flow plumbing fixtures.  
● Install water-efficient appliances.  
● Incorporate the use of reclaimed water. Measures to incorporate reclaimed water may include, but are not limited to, onsite water recycling; the use of recycled water to fill lakes, ponds, and ornamental fountains; the use of recycled water for irrigation, to mix concrete, and to control dust at construction sites; the use of recycled water for certain industrial processes and for flushing toilets and urinals in nonresidential buildings; and the use of recycled water for street sweeping purposes. | X                     | X                                       | X                                       | X                                       | Land Use Agency/Special District |
### WS-1c Ensure Adequate Water Supply for Development Projects.

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

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<td>WS-1c Ensure Adequate Water Supply for Development Projects.</td>
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### WS-2 Implement Groundwater Measures to Ensure Sustainable Yield For Development Projects.

The County of San Diego, cities, and other local jurisdictions can and should ensure sustainable yield of groundwater basins during planning, design, and project-level CEQA review of development projects, by taking measures including, but not limited to, the following:

- Participate in a groundwater trading program to enable permanent transfer and potentially long-term and short-term lease of baseline pumping allocations to allow groundwater users or new development to purchase needed groundwater allocation from others.
- Use drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.
- Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and offsite mitigation.

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Implementation Timing</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Planning/Design/ CEQA Review</td>
<td>Grading/ Construction</td>
</tr>
<tr>
<td>WS-2 Implement Groundwater Measures to Ensure Sustainable Yield For Development Projects.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Mitigation Measure</td>
<td>Implementation Timing</td>
<td>Responsible Party</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------------</td>
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<td>----------------------------------------</td>
</tr>
<tr>
<td>⚫ Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.</td>
<td></td>
<td>SANDAG</td>
</tr>
<tr>
<td>⚫ WS-3 Implement Measures for New or Expanded Water Facilities.</td>
<td>X</td>
<td>Transportation Project Sponsor</td>
</tr>
<tr>
<td>⚫ WF-1 Reduce Wildfire Risk for Development and Transportation Projects.</td>
<td>X</td>
<td>Land Use Agency/ Special District</td>
</tr>
</tbody>
</table>

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

**Wildfire**

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

- Establishing site-specific safety measures, such as fire protection plans, to protect local resources from wildfire. Fire protection plans should be based on appropriate wildfire modeling, and include information related to reducing ignition risks during construction and operation of facilities.
- Adhering to the most updated building code requirements (usually updated every 3 years), including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers.
<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Implementation Timing</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Planning/Design/CEQA Review</td>
<td>Grading/Construction</td>
</tr>
<tr>
<td>Improving access by designing and improving roads, transit facilities, gates, and access plans to accommodate emergency response and evacuation if necessary.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Ensuring sufficient emergency water supply for existing and new projects by working with water management agencies and plans.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Enforcing defensible space regulations to keep overgrown and unmanaged vegetation and other flammable material away from structures.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><strong>WF-2 Reduce Wildfire Risk Related to Wildfire-Associated Infrastructure Required to Support Development or Transportation Projects.</strong></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>During planning, design, and project-level CEQA review of transportation network improvements or development projects located in SRAs or in LRAs classified as VHFHSZs, the County of San Diego, cities, other local jurisdictions, and public service and utility providers can and should ensure that project sponsors implement measures to reduce impacts from wildfire-associated infrastructure. Such measures include, but are not limited to, the following:</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>• Establishing site-specific safety measures, such as fire protection plans, for new infrastructure and facilities required to provide public services and utilities for new development in order to protect local resources from wildfire.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>• Adhering to wildfire safety and mitigation plans established by local utilities companies, including design and construction standards, inspection schedules, and emergency preparedness.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>• Adhering to the most updated building code requirements (usually updated every 3 years) for structures related to public services and infrastructure, including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>• Ensuring sufficient emergency water supply (local water providers) for existing and new projects.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><strong>WF-3 Reduce Post-Fire Risks Related to Flooding, Landslides, Slope Instability, or Drainage Changes for Development and Transportation Projects.</strong></td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>
During planning, design, and project-level CEQA review of development projects or transportation network improvement projects in SRAs or in LRAs classified as VHFHSZs, SANDAG shall, and the County of San Diego, cities, and other local jurisdictions can and should, ensure that project applicants work with local communities to implement measures to reduce post-fire impacts. Such measures include, but are not limited to, the following:

- Treating wildfire burned areas to control stormwater runoff prior to winter rains.
- Restoring wildfire areas by planting native vegetation cover or encouraging the regrowth of native species using best practices as soon as possible to aid in control of stormwater runoff.
- Reducing potential for future flood hazard by sufficient removal of dead, woody vegetation along watercourses following a catastrophic fire to reduce the risk of future catastrophic fires.
- Including fire hazard reduction measures that balance forest health with fuel-reducing activities while considering the potential effect on flood management.
APPENDIX P1
RESPONSE TO COMMENTS ON THE DRAFT EIR

The Draft Environmental Impact Report (Draft EIR) for San Diego Forward: The 2021 Regional Plan (the Regional Plan) was distributed for public review on August 27, 2021, for a 45-day public review period that ended October 11, 2021. The Draft EIR and all appendices were available for review online at www.sdforward.com; at San Diego Association of Governments (SANDAG) offices located at 401 B Street, Suite 800, San Diego, California 92101; and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library facilitates inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the public comment period.

A total of 51 comment letters, web comments, or other written documents such as emails (hereinafter collectively referred to as “comment letters”) were received before the close of the public review period. Table P-1 provides a list of all comments received, including the name of the public agency, organization, or individual that submitted the letter and the date of the letter. Each comment letter also has been assigned an identification number in Table P-1.

In this appendix, each comment letter is reproduced in its entirety and is aligned side-by-side with the response(s) to the letter. Where commenters provided multiple comments, each comment is identified with a bracket and an identifying number in the margin of the comment letter. All comment letters received on the Draft EIR were evaluated for significant environmental issues, and written responses to comments on environmental issues were prepared. In addition to comments related to environmental issues, several of the comment letters submitted on the Draft EIR also include individual comments on the content of the Plan itself that are not related to the adequacy of the Draft EIR. In those cases, this document identifies the specific reference number assigned to that comment in the matrix of Regional Plan comments and responses where the response can be found (e.g., “Please see the response to Plan comment 901”). For ease of reference the matrix of responses to comments on the Regional Plan is included as Appendix P.2 to the Final EIR.

MASTER RESPONSES

SANDAG has prepared the following two Master Responses dealing with common themes raised in the comment letters:

- Master Response 1: Draft EIR Evaluates a Reasonable Range of Alternatives
- Master Response 2: Mitigation Measures that Other Agencies “Can and Should” Implement

The text of each Master Response is provided below. Individual responses reference the Master Response number when all or part of a response is included within a Master Response (e.g., “Please see Master Response 1”).
### Table P1-1

**List of Comment Letters on the Draft EIR for the Draft 2021 Regional Plan**

<table>
<thead>
<tr>
<th>Identification Number</th>
<th>Public Agency, Organization, or Individual</th>
<th>Date of Letter</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Office of Joel Anderson</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>2</td>
<td>Dr. Tim Bilash</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>3</td>
<td>Patricia Borchmann</td>
<td>9/24/2021</td>
</tr>
<tr>
<td>4</td>
<td>Mike Brower</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>5</td>
<td>Mike Bullock</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>6</td>
<td>Climate Action Campaign</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>7</td>
<td>City of Carlsbad</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>8</td>
<td>Center for Biological Diversity</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>9</td>
<td>California Department of Fish and Wildlife</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>10</td>
<td>California Coastal Commission</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>11</td>
<td>City of Coronado</td>
<td>10/6/2021</td>
</tr>
<tr>
<td>12</td>
<td>County of San Diego</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>13</td>
<td>City of Del Mar</td>
<td>10/4/2021</td>
</tr>
<tr>
<td>14</td>
<td>Descanso Community Planning Group</td>
<td>10/4/2021</td>
</tr>
<tr>
<td>15</td>
<td>Endangered Habitats League</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>16</td>
<td>Friends of Rose Creek</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>17</td>
<td>Friends of Rose Canyon</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>18</td>
<td>David Grubb (Quality of Life Coalition)</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>19</td>
<td>Toshi Ishihara</td>
<td>9/17/2021</td>
</tr>
<tr>
<td>20</td>
<td>Jacumba Community Sponsor Group</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>21</td>
<td>Craig Jones</td>
<td>9/17/2021</td>
</tr>
<tr>
<td>22</td>
<td>San Diego County Local Agency Formation Commission</td>
<td>9/30/2021</td>
</tr>
<tr>
<td>23</td>
<td>Libby Lucas</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>24</td>
<td>James Marple</td>
<td>9/3/2021*</td>
</tr>
<tr>
<td>25</td>
<td>City of Oceanside</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>26</td>
<td>City of Poway</td>
<td>10/11/2021</td>
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<tr>
<td>27</td>
<td>City of San Diego</td>
<td>10/11/2021</td>
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<tr>
<td>28</td>
<td>City of San Marcos</td>
<td>10/7/2021</td>
</tr>
<tr>
<td>29</td>
<td>Southern California Tribal Chairmen’s Association</td>
<td>9/8/2021</td>
</tr>
<tr>
<td>30</td>
<td>San Diego County Air Pollution Control District</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>31</td>
<td>San Diego County Regional Airport Authority</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>32</td>
<td>San Diego Transportation Equity Working Group</td>
<td>10/8/2021</td>
</tr>
<tr>
<td>33</td>
<td>Sierra Club San Diego</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>34</td>
<td>Chatten Brown, Carstens &amp; Minteer LLP (on behalf of Sierra Club San Diego)</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>35</td>
<td>Save our Forest and Ranchlands/Cleveland National Forest Foundation</td>
<td>10/7/2021</td>
</tr>
<tr>
<td>36</td>
<td>City of Solana Beach</td>
<td>10/11/2021</td>
</tr>
<tr>
<td>37</td>
<td>Southwest Wetlands Interpretive Association</td>
<td>10/11/2021</td>
</tr>
</tbody>
</table>
MASTER RESPONSE 1: DRAFT EIR EVALUATES A REASONABLE RANGE OF ALTERNATIVES

INTRODUCTION

Comments assert that the range of alternatives evaluated in the EIR does not meet the California Environmental Quality Act’s (CEQA’s) requirement to evaluate a reasonable range of potentially feasible alternatives that would avoid or substantially reduce the project’s significant environmental impacts. Comments also assert that all alternatives evaluated in the Draft EIR are infeasible for financial and other reasons because they accelerate all transit and alternative transportation projects to the first 10 years of the Plan with insufficient funding. Comments also state that the Draft EIR should have considered a number of additional alternatives, including:

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

As explained below, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider the alternatives listed above.
RANGE OF ALTERNATIVES

As discussed in Chapter 6, *Alternatives Analysis*, of the Draft EIR, nine potential alternatives were initially considered for further detailed analysis. Of these, three alternatives to the proposed Plan were evaluated in detail. In addition to the no project alternative, the alternatives evaluated in detail included an alternative that consists of the 2019 Federal Regional Transportation Plan (RTP) transportation network and land use pattern with new value pricing and user fees policies; and an alternative that consists of the proposed Plan transportation network, a land use pattern that restricts regional growth to mobility hubs, and includes more progressive value pricing and user fees policies than what is included in the proposed Plan. The three alternatives evaluated in detail are described in Draft EIR Section 6.2 (pages 6-2 through 6-8).

They are as follows:

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

Draft EIR Section 6.5 (pages 6-9 to 6-16) explains why other alternatives suggested by the public during EIR scoping were not evaluated in detail, either because they did not meet the project objectives, they were potentially infeasible, or they were similar to the alternatives already evaluated in detail.

ALTERNATIVES RESPOND TO PUBLIC CONCERNS EXPRESSED DURING SCOPING

As the Draft EIR explains (p. 6-1), SANDAG listened to public input expressed during the EIR scoping process, and used this input develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested, such as providing more compact land use patterns, substantially lowering transit fares, and substantially increasing the cost of driving.

Notably, alternatives do not need to be environmentally superior in all respects to the proposed Plan. Courts have noted that for complex projects with a wide scope, “it is practically impossible to imagine an alternative that would provide substantial environmental advantages in all respects” (*Sierra Club v. City of Orange* (2008) 163 Cal. App. 4th 523).

FEASIBILITY OF ALTERNATIVES EVALUATED IN DETAIL

The feasibility of alternatives is considered twice in the CEQA process. At the outset, the Draft EIR considered a reasonable range of alternatives that are “potentially feasible” (CEQA Guidelines Section 15126.6(a)). At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) makes final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See Guidelines Section 15091(a)(3).)

This final determination of feasibility may include policy considerations. Where the feasibility of alternatives evaluated in the EIR is dependent upon changes in existing laws, regulations, or funding patterns for transportation improvements, the SANDAG Board must consider the likelihood that such changes will occur within the time frame for implementation of relevant elements of the proposed Plan.
ALTERTIVNES SUGGESTED BY COMMENTERS

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

- A feasible alternative that would substantially reduce vehicle trips and VMT.
- SOFAR’s and CNFF’s Climate, Housing, Transit Alternative.
- An alternative that substantially lessens significant impacts on biological resources.
- An alternative with VMT reduction features such as subsidized transit fares and microtransit.
- SWIA’s alternative that prioritizes transit over managed lanes, institutes a much more rigorous monitoring system, adds a regional habitat conservation fund, and ensures enforcement of Plan compliance.
- An alternative that reduces GHG emissions consistent with State goals or achieves net zero emissions.

Some of the alternatives suggested by commenters are variations of alternatives that the Draft EIR evaluated in detail. CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in a Draft EIR, or to consider additional potential alternatives that are not “considerably different” than those already evaluated in the EIR. Other alternatives suggested by commenters are alternatives to one component of the proposed Plan, e.g., transit-emphasis alternatives, rather than comprehensive alternatives addressing the Sustainable Communities Strategy (SCS) and highway network improvements as well as transit. To be legally adequate under federal transportation law and Senate Bill (SB) 375, the proposed Plan is required to address transit projects, highway projects, and sustainable land use patterns; all three components are integrated into the basic project objectives described in EIR Section 2.4 (page 2-6). An EIR must discuss alternatives to a project in its entirety but is not required to discuss alternatives to each particular component of a project. Also, an EIR need not evaluate in detail alternatives that would not substantially lessen the proposed project’s significant environmental impacts.

The potential alternatives proposed for evaluation in comments on the Draft EIR either are not considerably different than those evaluated in the Draft EIR, do not address all project components, do not meet most basic project objectives, do not substantially reduce the proposed Plan’s significant impacts, and/or are infeasible. Selected individual potential alternatives are discussed below.

**Alternative that Substantially Reduces VMT Below Existing Levels**

Commenters suggest the Draft EIR should have evaluated a project alternative that substantially reduces VMT below existing levels. Alternative 3 consists of the proposed Plan transportation network, a land use pattern that restricts all regional growth to the mobility hubs, and more progressive value pricing and user fees policies than what is included in the proposed Plan; it achieves lower total VMT than the proposed Plan, though still above existing levels. An alternative including further VMT-reduction measures to reduce total VMT below existing levels is not currently feasible for several reasons, including:

- **Further** substantial changes needed in State and federal policy and legislation. These would include still further changes in State road pricing policy, land use policies, and parking policies—beyond those included in the proposed Plan and Alternatives 2 and 3—that are not reasonably foreseeable.

- Lack of funding for further and accelerated major transit service improvements (recognizing that, as discussed in additional detail in subsequent discussion, increased transit investments alone cannot achieve substantial VMT reductions). The request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or
collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network.

- Severe economic and social impacts caused by substantial increases in driving costs. Alternative 3 already raises the fees compared to the proposed Plan. From a consumer standpoint, increases in fuel or vehicle user costs can be a trade-off with discretionary expendable income for purchasing food, clothing, and other personal items, especially for lower income households. A significant increase in fuel cost or vehicle user fees would also result in lower spending in other areas of the economy, and economic disruption would occur in adjusting to higher fuel or vehicle registration prices.

- Lack of authority for SANDAG and local governments to implement such further measures. For example, SANDAG has no authority to increase State road pricing, or require local governments to implement land use or parking policies.

- SANDAG's inability to control the total regional population growth that is the main cause of total VMT increases. As SANDAG modeling indicates, population growth is the main driver of future VMT growth. Alternative 3 would result in VMT per capita of 15.6 (home-based) compared to the proposed Plan VMT per capita of 16.03 in 2050. Alternative 3 would result in a total VMT increase of 2,756,715 miles per day in year 2050, which is approximately 39 percent lower than the proposed Plan (total VMT increase of 4,519,230 miles per day in year 2050). Population growth under the proposed Plan, however, increases by 13 percent. Even with decreases in driving per capita, under Alternative 3 total VMT still increases by 3.2 percent compared to 2016 because population growth outpaces driving reductions. As courts have noted, "CEQA is not intended as a population control measure" (Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 220).

**SOFAR's and CNFF's Climate, Housing, Transit Alternative**

This alternative was proposed in scoping, but considered and rejected from detailed consideration in the Draft EIR; in response to a later Draft EIR comment letter reiterating it should have been included, further explanations for rejection are included in the Final EIR's responses to SOFAR's and CNFF's Draft EIR comment letter.

As explained in the Draft EIR (pp. 6-14 and 6-15), some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3. These include comprehensive transit investments in: high-speed commuter rail; tunneling and double-tracking where feasible; rail line straightening, higher-speed and higher-frequency transit with separate rights-of-way, fewer stops, grade separation, and new high-speed lines; a Central Mobility Hub that connects to the airport as well as to transit elements offering further interconnectivity throughout the San Diego region; and expanded local transit and shared mobility. The proposed Plan and Alternative 3 also include an intensified, compact land use, as well as expanded active transportation infrastructure improvements.

This alternative includes the following major components that were not included in the proposed Plan or EIR alternatives, for the reasons discussed below:

- A “transit first” plan that substantially reduces VMT and provides substantive benefits in transit/bike/walk mode share and advancing all transit projects to the first 10 years of the Plan.

- Prioritize transit/active transit over managed lanes.

- Accelerate implementation of the Los Angeles–San Diego–San Luis Obispo Rail Corridor (LOSSAN) double-track rail project and Miramar tunnel and rail line straightening project.
With regards to accelerating transit to the first 10 years of the Plan, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as Federal Transit administration (FTA) Section 5307 or Regional Surface Transportation Program (RSTP), are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but cannot advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as the State Highway and Protection Program (SHOPP) funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by the California Department of Transportation (Caltrans).

With regards to prioritizing transit over managed lanes and accelerated implementation of rail projects, SANDAG conducted a modeling analysis to compare the proposed Plan network with managed lanes investments to the Climate, Housing, Transit Alternative. The model run assumed no new managed lanes (only transit lanes), and accelerated the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR’s and CNFF’s Draft EIR comment letter, converting managed lanes to transit lanes and accelerating the Miramar Tunnel rail line results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

In summary, the Climate, Housing, Transit alternative was not selected for detailed consideration in the EIR because:

- Some specific feasible components of this alternative are already included in the proposed Plan and/or Alternative 3.
- It is infeasible to accelerate transit to the first 10 years of the Plan and redirect all roadway funding to transit.
- The Climate, Housing, Transit alternative results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.
- It is infeasible to achieve the GHG and VMT reduction goals proposed in the Climate, Housing Transit alternative; see Draft EIR p. 6-15 through 6-16 and the discussion below regarding the infeasibility of an alternative that reduces GHG emissions consistent with State goals.

**Alternative that Substantially Lessens Significant Impacts on Biological Resources**

A commenter suggested an alternative that would avoid or substantially lessen impacts on biological resources. As discussed in Section 4.4, Biological Resources, of the EIR the impacts on biological resources were analyzed at a programmatic level based on best available information. Impacts were analyzed based on the programmatic footprint developed for the 2021 Regional Plan, and mitigation measures were identified accordingly that achieve substantial reductions to impacts. Additional analysis will be conducted on a project-specific level under CEQA, including project-specific impact analysis of biological resources and identification of mitigation measures. Mitigation measures would be refined and implementation methods identified, as required by CEQA, the local jurisdictions, and Wildlife Agencies on a project-specific level.

The Plan places emphasis on maximizing the use of existing facilities and focusing growth within urban areas to preserve habitat and open space. In addition, Alternative 3 has a smaller footprint and would further reduce impacts on biological resources. In summary, the proposed Plan and Alternative 3 both substantially reduce...
biological resources with the implementation of mitigation measures and the proposed footprints, and a new alternative that also reduces such impacts is not required for an adequate range of alternatives.

**Alternative with Subsidized Transit Fares and Microtransit**

Another commenter requested that alternatives that include features such as subsidized transit fares and microtransit be considered. SANDAG considered public input provided during the EIR scoping process, and used this input to develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested, including subsidized transit fares and microtransit. As discussed in Chapter 6, Alternative 3 (All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies) includes free transit and microtransit by 2035. Because Alternative 3 would not reduce any of the Plan’s significant impacts to less-than-significant levels, just modifying the transportation network to include subsidized transit fares and microtransit would not be enough to substantially reduce VMT and GHG emissions as compared to the proposed Plan.

In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by fiscal year (FY) 2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, Metropolitan Transit System (MTS), and North County Transit District (NCTD) are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19.

**SWIA’s Alternative that Prioritizes Transit Over Managed Lanes, Institutes a Much More Rigorous Monitoring System, Adds a Regional Habitat Conservation Fund, and Ensures Enforcement of Plan Compliance**

Reasons for not including each of the four components in an EIR alternative are discussed below. In addition, there is no evidence that collectively, they would substantially reduce any of the proposed Plan’s significant impacts.

**Prioritizing Transit over Managed Lanes**

Comments suggest that the proposed Plan should prioritize transit over managed lanes. The Managed Lanes network of the proposed Plan uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and High-Occupancy Vehicles (HOVs) to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the Regional Plan.

As discussed above under SOFAR's and CNFF's Climate, Housing, Transit Alternative, SANDAG conducted a modeling analysis to compare the proposed Plan network with managed lanes investments to the Climate, Housing, Transit Alternative, which focuses on prioritizing transit. The model run assumed no new managed lanes (only transit lanes), and accelerated the LOSSAN double-track rail project and the Miramar Tunnel rail line and straightening project to 2035. As discussed in detail in responses to SOFAR's and CNFF's Draft EIR comment letter, converting managed lanes to transit lanes and accelerating the two suggested rail projects results in similar VMT and GHG impacts as the proposed Plan, and does not substantially reduce them.

Furthermore, there are regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved
or collected on an annual basis and much funding cannot be advanced. There are also constraints on which
dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and
rehabilitate the transportation network, as described further under the SOFAR and CNFF Climate, Housing, Transit Alternative above.

**Monitoring System for Transportation System’s Buildout and Performance**

Comments suggest that SANDAG implement clear and definitive mechanisms to monitor future population
growth, jobs, and housing development in accordance with the proposed Plan to ensure that transportation
system investments are in line with development and growth trends.

As identified in Appendix B of the Regional Plan, SANDAG will continue to monitor the implementation of the
Regional Plan on a 4-year cycle and make the data accessible to the public. Monitoring would occur 2 years
after adoption of the Regional Plan. Furthermore, SANDAG has committed to monitor the implementation for
the SCS on a 2-year cycle pursuant to California Assembly Bill 1730 (Gonzalez 2019). A performance monitoring
report using the indicators from Appendix E of the Regional Plan is developed halfway between each 4-year
regional plan cycle. The report is shared with the SANDAG Board of Directors to provide a high-level status
update on critical areas across the region. This information helps inform the Board of Directors in their
development of regional goals for the subsequent regional plan. The indicators use available observed data that
also informs how each indicator is calculated. In summary, some specific feasible components of this alternative
are already included in the proposed Plan.

**Regional Habitat Conservation Fund**

Comments suggest that an alternative that includes a regional habitat conservation fund be included in the EIR. Appendix AA of the Regional Plan describes the status of the Habitat Conservation Plans (HCPs) within the region. Each local jurisdiction that signed an Implementing Agreement for their HCP has been granted “take” authorization for impacts on endangered and threatened species. By way of the take authorizations, the local jurisdictions have made commitments to fund the local costs for acquisitions, management, and monitoring. Funds to cover these local costs will be raised on a regional or plan area basis as outlined in the Implementing Agreements.

SANDAG will continue its existing grant programs, partner with member agencies on State funding
opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts
in line with the 2021 Regional Plan. To meet the region’s habitat conservation goals, the 2021 Regional Plan
identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced
habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix
B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat
conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in
Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8, Greenhouse Gas Emissions, of
the EIR), and $300–$500 million of land acquisition and restoration for habitat mitigation of transportation
projects (incorporated in project costs presented in Appendix A of the proposed Plan).

As such, because HCP funding is already included in the proposed Final Plan, no additional alternative with this
component is necessary.

**Ensuring enforcement**

Comments suggest that an alternative should ensure enforcement of the jurisdictions’ compliance with the
Plan. Land use authority is reserved to local jurisdictions: the cities and the County. The cities and the County
are best positioned to effectively implement and monitor the objectives outlined in the 2021 Regional Plan as
those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program, and it will meet the goals of the proposed Final 2021 Regional Plan.

The 2021 Regional Plan envisions forecasted growth to be concentrated in Mobility Hubs throughout the region, which will be implemented in close coordination with local jurisdictions to align with the unique needs of each community. Many Mobility Hubs are employment centers or other popular destinations, and SANDAG would work with local jurisdictions to update plans and policies to allow for more housing in these locations where feasible. Local jurisdictions maintain land use authority and are responsible for decisions regarding density, zoning, and housing policies.

In addition, for second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used. Where SANDAG acts as a pass-through agency for funding, it is the funding agency’s responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

In summary, a number of enforcement provisions are already included in the proposed Plan, and an additional alternative with this component is not required.

**Alternative that Reduces GHG Emissions to Net Zero or Consistent with State Goals**

Multiple commenters assert that the range of alternatives is not reasonable because the alternatives would still be inconsistent with statewide GHG reduction and climate goals. The Draft EIR Impact GHG-5 analysis explains why it is infeasible for the proposed Plan to be consistent with the State’s ability to meet the 2030 reduction target of SB 32 and the long-term reduction goals of Executive Orders B-55-18 (2045) and S-3-05 (2050). Similar feasibility constraints apply to other potential proposed Plan alternatives. In addition, as identified in Section 4.8 of the EIR, the proposed Plan would reduce GHG emissions for all three horizon years. As discussed in the Draft EIR, p. 4.8-40, the State has yet to develop or adopt an overarching plan that provides the framework for how California will achieve carbon neutrality by 2045. California's 2017 Climate Change Scoping establishes the statewide framework for achieving the goal of a 40 percent reduction from 1990 GHG levels in 2030 and put post-2030 statewide emissions on a downward trajectory toward the long-term statewide GHG reduction goals for 2045 and 2050. The 2017 Scoping Plan indicates that to achieve these targets and goals, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California’s natural and working lands, and sustainable solid waste management are among many actions the State must take. The State has not adopted a plan analogous to the 2017 Scoping Plan since that addresses achieving the EO S-3-05 goal of reducing statewide GHG emissions by 80 percent below 1990 levels by 2050 or the B-55-18 goal of achieving statewide carbon neutrality no later than 2045.

The proposed Plan would assist in meeting the statewide 2030 GHG target in putting statewide emissions on a downward trajectory toward statewide post-2030 goals by reducing GHG emissions in the passenger vehicle sector through the implementation of transportation network improvements and programs and efficient land use patterns to ultimately reduce VMT and the combustion of gasoline and diesel fuels pursuant to SB 375. However, it is unknown at this time what combination of reduction and removal strategies will be pursued in California to achieve this goal. Available research and reports, discussed in detail in Section 4.8 of the EIR, indicate that achieving statewide GHG reduction goals will require major shifts or even fundamental transformations in the economic, social, technological, and political fabric of life in California and beyond, including the development of new technologies; large-scale deployment of new and existing technologies; and
the roles of local, State, and the federal government in regulating economic activities and personal behaviors that affect GHG emissions.

Furthermore, as discussed in Chapter 2, Project Description, of the EIR SANDAG updates the Regional Plan every 4 years, and future iterations of the Plan and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region’s progress toward the State’s goal of carbon neutrality by 2045. The required GHG reductions from the aforementioned sectors will be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. As such, a proposed Plan alternative that further reduces GHG emissions consistent with State GHG reduction goals was not included for detailed consideration in the EIR because it is beyond SANDAG’s or local agencies’ current ability to implement.

**MASTER RESPONSE 2: MITIGATION MEASURES THAT OTHER AGENCIES “CAN AND SHOULD” IMPLEMENT**

**INTRODUCTION**

The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects. Many Draft EIR mitigation measures for second-tier projects, recognizing that agencies other than SANDAG (e.g., local governments, transit districts, and Caltrans) are responsible for implementation, state that such agencies “can and should” implement them. Comments assert that there is no guarantee these agencies will actually implement these mitigation measures, question whether they will be imposed on second-tier projects, and allege that, to the extent SANDAG has any discretion over awarding funds for such projects, SANDAG must require the mitigation measures as conditions of approval.

One comment asserted that “can and should” is discretionary language and makes the mitigation measure non-enforceable, and that SANDAG should mandate implementation of mitigation measures for its own projects and for other agencies implementing projects under the Regional Plan.

As discussed in the Draft EIR (page 4-4), SANDAG is responsible for implementing those mitigation measures within its responsibility, jurisdiction, and statutory authority. Mitigation can also include measures that are within the responsibility and jurisdiction of another public agency (CEQA Guidelines Section 15091 (a)(2)). In many instances, mitigation measures included in the EIR that would avoid or substantially lessen significant impacts of the proposed Plan fall under the responsibility and jurisdiction of other implementation agencies, such as cities, the County, Caltrans, public transit agencies, or other special districts. In other words, SANDAG will not be the lead agency for the majority of the second-tier projects that implement the proposed Plan.

Because other project agencies would be responsible for certain mitigation measures identified in this EIR, SANDAG in its CEQA findings may find that those measures, if feasible, can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2)). Further details regarding responsibilities for mitigation measure implementation will be provided in a separate mitigation monitoring and reporting program (MMRP) that the SANDAG Board of Directors will consider for approval in conjunction with approval of the proposed Plan.
EIR MITIGATION APPROACH

When CEQA findings are adopted, SANDAG will commit to those feasible mitigation measures that are within its responsibility and jurisdiction by making the finding that its mitigation measures "have been required in, or incorporated into, the project" (Public Resources Code Section 21081(a)(1); CEQA Guidelines Section 15092(a)(1)). For second-tier transportation projects, SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used. Where SANDAG acts as a pass-through agency for funding, it is the funding agency’s responsibility to place conditions on grant funding. When using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

Therefore, the assertion that "can and should" language is unenforceable is incorrect, in that SANDAG would enforce these measures by requiring them as grant conditions for transportation projects whenever it has discretionary authority to do so.

When SANDAG makes “can and should” findings at the end of the CEQA process, there is no further requirement that SANDAG find that mitigation measures that are solely within the responsibility and jurisdiction of another agency have been incorporated into the project (Public Resources Code Section 21081; CEQA Guidelines Section 15091(a)(2)). Nevertheless, as discussed below, it is reasonable to expect that the other agencies will actually implement the mitigation measures assigned to them.

The Draft EIR (pages 4-3 through 4-4) describes the intended use of a mitigation measure and the general approach to the mitigation measures in the EIR.

“The EIR includes three broad types of mitigation measures: (1) plan- and policy-level mitigation measures assigned to SANDAG; (2) mitigation measures for transportation network improvements and programs, assigned to SANDAG and other transportation project sponsors; and (3) mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions implement.”

While the EIR provides as much detail as needed in the mitigation measures to evaluate their ability to avoid or substantially lessen impacts, some flexibility must be maintained to present mitigation approaches for impacts occurring under different circumstances. Many of the mitigation measures include lists of mitigation actions that can be implemented in connection with individual future transportation and development projects that would implement the proposed Plan; development projects would be undertaken under the land use authority of local governments. These individual future projects will occur over a wide and diverse geographic scope over the 30-year time span addressed in the proposed Plan. Some will require approvals from multiple public agencies, each with different legal, regulatory, or other authority relevant to the proposed Plan. Because the nature of individual future projects, resources, and legal authority of the approving agency or agencies, physical circumstances of the project, and local policy considerations for all future projects implementing the proposed Plan will vary widely, the mitigation actions included, while generally feasible for many projects, may not be feasible for specific projects. In each case, the lead agency (and any responsible agencies) for an individual project will have to determine

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1 SB 1703 consolidated the region’s transit capital construction with SANDAG from the two transit operators. SANDAG also coordinates with Caltrans as the lead agency for highway projects. Local jurisdictions construct arterial and local roadway projects.
which mitigation actions are specifically applicable to the project, and the degree to which the recommended mitigation actions can feasibly be implemented based on project-specific circumstances.

GREENHOUSE GAS EMISSIONS MITIGATION

In addition, the Draft EIR (pages 4.8-35 and 4.8-36) explains the EIR’s general approach to GHG mitigation. This approach is applicable to other significant impacts described in the EIR.

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

"While SANDAG has the authority to implement the mitigation measures it has committed to, it has no legal or jurisdictional authority to require other transportation project sponsors or local jurisdictions to implement mitigation measures for specific projects for which they have responsibility and jurisdiction. As explained in the introduction to Chapter 4, mitigation can include measures that are within the responsibility and jurisdiction of another public agency. SANDAG in its CEQA findings may find that those measures assigned to other agencies can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2))."

TRANSPORTATION PROJECT MITIGATION

SANDAG has limited authority to approve individual second-tier transportation network improvement projects in the RTP. Many individual transportation projects in the RTP would be implemented by Caltrans and local governments. For example, Caltrans would implement most of the managed lane projects, and local governments would implement the arterial project shown on Figures 2-23 through 2-25 of the EIR. As required by CEQA and agency-specific CEQA procedures (e.g., the Caltrans Standard Environmental Reference), these agencies routinely implement the types of mitigation measures assigned to them during project design, CEQA review, and/or project construction, and the Draft EIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them. Additionally, SANDAG is the direct source of funding (versus a pass-through agency) for TransNet grant programs funding local agency capital projects and will require as a grant condition the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

LAND USE PLAN AND PROJECT MITIGATION

SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS (Government Code Section 65080(b)(2)(K)). Local governments are the main agencies responsible for mitigation of the impacts of land use plans and projects that implement the SCS, and SANDAG has no concurrent authority to mitigate the impacts of land use plans and policies. Local governments routinely implement the types of mitigation measures assigned to them during project design, CEQA review, and/or project construction, and the Draft EIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them.
A recent, relevant example of local government implementation of mitigation measures addressing the land use change and regional growth projected to occur as a result of implementation of local general plans is provided below.²

- An Air Quality Impact Analysis shall be prepared for projects within the General Plan Update boundary that exceed one of the air quality study trigger criteria in Table 4.3-12, Air Quality Impact Analysis Trigger Criteria.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Project Site that would Trigger Air Quality Impact Assessment</th>
<th>Single Family Dwelling Unit Equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family Residential 300 du 1 du/1 du</td>
<td>300 du</td>
<td>1 du/1 du</td>
</tr>
<tr>
<td>Apartments: 6-20 du/acre</td>
<td>370 du</td>
<td>1 du/1.23 du</td>
</tr>
<tr>
<td>Apartments: &gt; 20 du/acre</td>
<td>420 du</td>
<td>1 du/1.4 du</td>
</tr>
<tr>
<td>Condominiums</td>
<td>370 du</td>
<td>1 du/1.23 du</td>
</tr>
<tr>
<td>Mobile Home Park</td>
<td>400 du</td>
<td>1 du/1.33 du</td>
</tr>
<tr>
<td>Supermarket</td>
<td>25,000 sf</td>
<td>1 du/83.33 sf</td>
</tr>
<tr>
<td>Restaurant, Fast Food w/drive through</td>
<td>6,500 sf</td>
<td>1 du/21.67 sf</td>
</tr>
<tr>
<td>Restaurant, Quality Sit Down</td>
<td>43,000 sf</td>
<td>1 du/143.33 sf</td>
</tr>
<tr>
<td>Neighborhood/County Park (undeveloped)</td>
<td>880 acres</td>
<td>1 du/2.93 acre</td>
</tr>
<tr>
<td>Motel</td>
<td>480 rooms</td>
<td>1 du/1.6 room</td>
</tr>
<tr>
<td>Standard Commercial Office (&lt;100,000 sf per office site)</td>
<td>190,000 sf</td>
<td>1 du/633.33 sf</td>
</tr>
<tr>
<td>Neighborhood shopping center</td>
<td>35,000 sf</td>
<td>1 du/116.67 sf</td>
</tr>
</tbody>
</table>

- Siting Sensitive Receptors near sources of Toxic Air Contaminants. A Health Risk Assessment (HRA) shall be prepared by a qualified air quality professional for development of new sensitive receptors proposed in the General Plan Update planning area within 500 feet of a waste transfer facility. A Health Risk Assessment (HRA) shall be prepared for development of new sensitive receptors in the General Plan Update planning area proposed within one mile of industrial land uses, medical facilities, or research and development facilities that generate a potential source of Toxic Air Contaminants (TACs). The project shall not be considered for approval until an HRA has been completed and approved by the City. The methodology for the HRA shall follow the Office of Environmental Health Hazard Assessment and SDAPCD guidelines for the preparation of HRAs. If a potentially significant health risk is identified, the HRA shall identify appropriate measures to reduce the potential health risk to below a significant level, or the sensitive receptor shall be sited in another location.

**PROJECT-SPECIFIC MITIGATION MEASURES MAY NOT APPLY TO EVERY PROJECT**

Comments suggest that the text in the EIR should remove the “can and should” language and require all agencies to implement the mitigation measures. Although second-tier lead agencies routinely implement the types of mitigation measures assigned to them during project design, CEQA review, and/or project construction, the Draft EIR recognizes that due to project- or site-specific circumstances, it may not be feasible for individual lead agencies to implement all of the “can and should” mitigation measures listed for a particular significant impact; in this case, the Regional Plan EIR programmatic mitigation measures still meet CEQA

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requirements, but in the later project-specific CEQA review, the Regional Plan EIR could not be used as a first-tier Program EIR for the significant impact proposed for mitigation. As stated on p. 4-4 of the Draft EIR:

“Because the nature of individual future projects, resources and legal authority of the approving agency or agencies, physical circumstances of the project, and local policy considerations for all future projects implementing the proposed Plan will vary widely, the mitigation actions included, while generally feasible for many projects, may not be feasible for specific projects. In each case, the lead agency (and any responsible agencies) for an individual project will have to determine which mitigation actions are specifically applicable to the project, and the degree to which the recommended mitigation actions can feasibly be implemented based on project-specific circumstances.”

Similarly, lead and responsible agencies for an individual project will have to determine whether the lead agency, the project proponent, or another entity is responsible for implementation of particular mitigation measures.
COMMENT LETTERS AND RESPONSES

COMMENT LETTER 1: OFFICE OF JOEL ANDERSON

Joel Anderson
October 11, 2021

Mr. Hasam Ikhrata
Chief Executive Officer
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Dear Mr. Ikhrata:

I am writing as a member of the SANDAG Board of Directors and the County Supervisor representing East County to submit my comments on the Draft Environmental Impact Report (DEIR) for the 2021 Regional Plan.

Ensuring Equity for All
The Executive Summary section of the DEIR states that one of the draft Regional Plan project objectives is to provide transportation investments and land use patterns that promote social equity. Additionally, the SANDAG Board also adopted a Commitment to Equity Statement clarifying that "...we firmly uphold equity and inclusion for every person in the San Diego region.

Opposition to Road User Charges
Unsurprisingly, the proposed Plan and Alternative 3, identified by SANDAG as the preferred alternative, would impose new road user charges on drivers based on vehicle miles traveled. As the County representative for numerous rural communities and tribal nations located throughout 2,000 square miles, I am strongly opposed to a per mile road user fees for motorists. The majority of my district is rural and home to many low-income residents who have no real alternatives to driving. A significant number of my constituents also represent the “tbodylitter” workforce who need their vehicles to perform their work.

Imposing an additional road user fee, which would primarily be used to fund transportation projects benefiting the County’s urban population, would not promote SANDAG’s commitment to social equity or uphold equity and inclusion for the population of East County. In fact, it would do the opposite and serve as a regressive fee by forcing commuters who live where housing and other cost-of-living expenses are more affordable to subsidize those choosing to live in more expensive urban and coastal communities.

RESPONSE TO COMMENT 1-1

Social equity disparity analysis is required by both State and federal law via Title VI of the Civil Rights Act of 1964 and EO 12898. During the process of evaluating the proposed Plan, calculations were made to determine improvements in mobility by percent point difference, between a No-Build projection and the Build projection. SANDAG found marginal percentage point differences between each population, with slight advantages leaning in favor of low income, aging populations, and other disadvantaged populations. For more information regarding social equity, methodology, and State requirements see Appendix H, Social Equity: Engagement and Analysis, of the proposed Plan.

SANDAG works closely with the County of San Diego and tribal nations to ensure transportation needs are met. SANDAG is currently preparing a Digital Equity Strategy to support advancement of access to broadband in areas with insufficient access..

RESPONSE TO COMMENT 1-2

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.
RESPONSE TO COMMENT 1-3
Transit Leap will offer people a network of high-capacity, high-speed, and high-frequency transit services that will incorporate new modes of transit while also providing improved existing services. Transit Leap includes Next Gen Rapid Bus Service, local bus, and Flexible Fleet services to complete the Transit Leap network. This bus network would offer faster and more reliable service with increased frequencies and longer service hours. Flexible Fleets can range from bikes and scooters to autonomous shuttles that provide on-demand service that are ADA compliant and provide options for users that may not have access to a smartphone or internet device to hail a ride.

RESPONSE TO COMMENT 1-4
The TransNet measure approved by San Diego County voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. The remaining projects in the TransNet measure may not be constructed due to changes in regional needs, changes in State law, and technology advancements that would suggest a different transportation solution. CAL536, shown in the 2021 Regional Transportation Improvement Program (RTIP), is a project for Operational Improvements to SR 52, which include a truck climbing lane, a bike lane, and an auxiliary lane. This project is currently expected to open to traffic in September of 2024. The project shown in the Regional Plan in 2035 includes the addition of three Managed Lanes to SR 52. When TransNet was adopted the anticipated future land use pattern included significant development in East County. Those developments are no longer expected due to expanded land preservation, slower regional growth rates, and state regulations focusing development near existing infrastructure. Many of the TransNet projects that have not yet been built were designed to support the East County growth that has not happened and is no longer anticipated.

The SANDAG Board of Directors may review the TransNet ordinance and discuss possible updates. This process is outside of the development the proposed Plan.

RESPONSE TO COMMENT 1-5
The proposed Plan includes Mobility Hubs for East County which can facilitate creating additional economic opportunities within that hub.
Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. They offer on-demand travel options and supporting infrastructure to enhance connections to high-quality Transit Leap services while helping people make short trips around the community on Flexible Fleets. Mobility Hubs will be implemented in close coordination with local jurisdictions to align with the unique needs of each community.

Several corridors were evaluated for their travel times between the 2016 baseline and future build scenarios (2025, 2035, and 2050). Two of these corridors were rural corridors between Ramona and Downtown San Diego via SR 67 and El Cajon to Kearny Mesa. In both of those corridors travel times were improved for auto travel (both solo vehicle and carpool) for all three build scenarios compared to the base year. These travel times will be included in Appendix T of the Final Plan.

SANDAG is also developing a Flexible Fleet Implementation Strategic Plan to identify near-term opportunities for Flexible Fleet pilots that support mobility, equity, and sustainability goals.

Also, the proposed Plan has been shown to meet the State GHG goals (19% reduction from 2005 levels by 2035). While related, no VMT goals are included in the Plan.

**RESPONSE TO COMMENT 1-6**

The 6th Cycle Regional Housing Needs Assessment (RHNA) Plan sets a strategy for sustainability that focuses housing and job growth in urban areas where there is existing and planned transportation infrastructure, protects the environment and helps ensure the success of smart growth land use policies by preserving sensitive habitat and open space, and addresses the housing needs of all economic segments of the population. In the long term, housing located near transit and jobs should provide opportunities for residents to take more trips by bus or train and live closer to where they work, reducing VMT and GHG emissions. A specific effort was made in the proposed Plan to match transportation with land use (including housing).
RESPONSE TO COMMENT 1-7

Land use authority is under the purview of local jurisdictions: the cities and the County. The cities and the County are best positioned to effectively implement the housing objectives outlined in the proposed Plan as those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program, and it will meet the goals of the proposed Plan. SANDAG’s Housing Incentive Program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs.

RESPONSE TO COMMENT 1-8

The commentor is requesting that SANDAG consider, develop, and adopt a mitigation measure that enacts a financial penalty for the cities that cannot meet their RHNA numbers. This mitigation measure is not within the authority of SANDAG to enact. SANDAG will continue to collaborate and coordinate with cities as applicable to meet RHNA numbers. Thank you for your comment, SANDAG appreciates your input.

Sincerely,

Joel Anderson
Supervisor, Second District

Cc: Kirsten Uchitel, Associate Planner, SANDAG
Appendix P. Response to Comments on the Draft EIR

COMMENT LETTER 2: DR. TIM BILASH

RESPONSE TO COMMENT 2-1
Thank you for your participation in the environmental review process. It is acknowledged that the body of knowledge regarding health risks associated with ultrafine particles originating from wildfires is rapidly evolving. Further elaboration regarding your concerns related to wildfires and ultrafine particles will be addressed in additional details in subsequent responses below.

RESPONSE TO COMMENT 2-2
As shown in Table 4.3-7 of the EIR, PM2.5 emissions would decrease by 9 percent between 2016 and 2050. In addition, as discussed in additional detail in Section 4.19, Wildfire, regional growth, land use change, and transportation network improvements associated with the proposed Plan would expose additional people and structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildland. Wildfires would also potentially expose the region’s population to harmful pollutant concentrations in the form of wildfire smoke. Mitigation measure WF-1 will reduce this impact by requiring measures to preclude or substantially reduce risks from wildland fires by requiring specific design features for new development and by requiring that adequate emergency response is in place to serve new development when wildfires occur. To the extent that these measures reduce risk of wildfire, they would also reduce the exposure of county residents to uncontrolled wildfire spread and to harmful pollutant concentrations in the form of wildfire smoke. However, given the uncertain nature of wildfires, it cannot be concluded that wildland fire risks and the risks associated with wildfire smoke pollution would be reduced to less than significant in all locations for all future development projects. Therefore, impacts remain significant and unavoidable.

The following text regarding newly published data concerning the association of elevated levels of PM2.5 from wildfires with increased incidence of COVID-19 was added to page 4.19-21 of Section 4.19, Wildfire:

A recent study suggests that the airborne PM2.5 can carry harmful microbes as evidenced by an increase in fungal infections in areas...
characterized by recent wildfires (Kobziar and Thompson III, 2020). Another recent study showed an association between elevated levels of COVID-19 cases and high PM2.5 concentrations originating from wildfires in the four weeks after exposure in counties with large wildfires in 2020 (Zhou et al. 2021).
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 2-3

The referenced podcast, available at https://www.medpagetoday.com/podcasts/healthwatch/94147, discusses several different issues. The first issue discussed is the health effects of PM2.5 from wildfires. The large contribution of wildfires to PM2.5 levels in the western U.S. is outlined, and the adverse health effects are discussed. The second issue addressed in the podcast is inequalities in access to health care between different ethnic groups, and how these inequities have been exacerbated by COVID-19. These issue discussions are distinct however, and neither wildfires nor PM2.5 are mentioned in the healthcare inequality discussion. Also, note that under CEQA, social equity is not an environmental issue required to be analyzed in an EIR.

RESPONSE TO COMMENT 2-4

Recent data suggesting that airborne PM2.5 originating from wildfires can carry harmful microbes, as evidenced by an increase in fungal infections in areas characterized by recent wildfires, was added to the impact discussion of Section 4.19, Wildfire, of the Final EIR.

RESPONSE TO COMMENT 2-5

The association between more prevalent wildfires and increased deaths is acknowledged. The existing conclusions state that the healthcare effects of wildfire include increased risk of death.

As discussed above under response to comment Bilash 2-2, mitigation measure WF-1 will reduce wildfires by requiring measures to preclude or substantially reduce risks from wildland fires in VHFSZs by requiring specific design features for new development and by requiring that adequate emergency response is in place to serve new development when wildfires occur.

In addition, mitigation measure WF-2, as discussed in greater detail in Section 4.19, Wildfire, of the EIR, combined with other mitigation measures resulting from project-level CEQA conducted by the implementing agency, including adherence to existing fire prevention regulations and BMPs, will reduce the impact of transportation-related infrastructure on wildfire risk.

However, as noted in the EIR, because there are no other feasible mitigation measures to reduce the proposed Plan’s contribution to
wildland fires to less than significant, impacts remain significant and unavoidable.

Thank you for providing a wide range of references for studies related to the effects of PM1, PM2.5, and PM10 on health and the environment. SANDAG will take these into consideration, as appropriate, during future air quality analyses.
Annual Number of Acres Burned in Wildland Fires, 1980-2020

https://www.fires.org/statistics/wildfires
I have attached a wide range of references for these small particles. I believe this demands new resources to monitor and find ways to mitigate the severe environmental impacts of population expansion, transportation and encroachment into high fire areas and transportation roadways pollution.

Please do not fail to include appropriate studies for these hazards.

Sincerely,
Timothy Bilash MD MS FACOG
drtennybilash@gmail.com

Attachments:
PMs pdf 25.7 KB
Appendix P1. Response to Comments on the Draft EIR

References for PM1, 2, 5, 10

PM18/25

Tires—An Emerging Threat to Our Waterways, Our Seafood, and Ourselves | NRDC

Scientists point to chemical in car tires that’s been killing coho salmon

Tires tread on the environment — POLITICO

Rubber in the environment Where the tread from our tires ‘disappears’ to

Tires The plastic polluter you never thought about
https://www.nationalgeographic.com/environment/article/tires-unseen-plastic-polluter

Pollution from tire wear 1,000 times worse than exhaust emissions
Tire Technology International

Tyre and road wear particles (TRMP)

Brake and tire particles measured from on-road vehicles: Effects of vehicle mass and braking intensity

Air particulate matter and cardiovascular disease: the epidemiological, biomedical and clinical evidence

Particulates (PM10, PM 2.5)
https://www.michigan.gov/eagle/0,9429,7-135-3310,70940-193454--,00.html

Particle Pollution
Brake and tire particles measured from on-road vehicles: Effects of vehicle mass and braking intensity

Research Synthesis #16-01 "Exposure to Fine Particulate Matter (PM2.5) Increases Health Risks for Californians" https://ww2.arb.ca.gov/resources/documents/research-synthesis-16-01-exposure-fine-particulate-matter-pm25-increases-health

Health effects of PM2.5 emissions from on-road vehicles during weekdays and weekends in Beijing, China https://www.sciencedirect.com/science/article/abs/pii/S1362231319300099

The health effects of ambient PM2.5 and potential mechanisms https://pubmed.ncbi.nlm.nih.gov/26498893/

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PM1

A work group report on ultrafine particles (American Academy of Allergy, Asthma & Immunology)

Air Quality Community Engagement Helps Make the Invisible Visible - Earthwatch
https://earthwatch.org/stories/air-quality-community-engagement-helps-make-invisible-visible?gclid=EAIaIQobChMT-o1b8irw4YVI1CChzW5XmgBOAYAAEeGgECCoRhwE

Effects of ambient PM1 air pollution on daily emergency hospital visits in China: an epidemiological study

Exposure to submicron particles (PM1.0) from diesel exhaust and pollen allergens of human lung epithelial cells induce morphological changes of astrocytoma tonofilaments and rough endoplasmic reticulum
Finer particulate matter (PM1) could increase cardiovascular disease risk.
https://www.sciencedaily.com/releases/2020/09/202009051441.htm

Is PM1 similar to PM2.5? A new insight into the association of PM1 and PM2.5 with children's lung function.

PM1 - The new focus to protect human health.

PM1 particles at coal- and gas-fired power plant work areas.
Seasonal concentration distribution of PM1.0 and PM2.5 and a risk assessment of bound trace metals in Harbin, China.
https://www.nature.com/articles/s41598-020-65187-7

Study shows PM1 air pollution is most harmful.
https://usa.chinadaily.com.cn/china/2013-10/28/content_17061997.htm

The Three Types of Particulate Matter: All About PM10, PM2.5, and PM0.1

Understanding Air Quality: What is PM10?
https://asthma.net/living/pm10-air-quality

What does PM 1 mean?
https://indianexpress.com/article/explained/what-does-pm-1-mean/

What is PM10 and PM2.5?

PM1 in Ambient and Indoor Air–Urban and Rural Areas in the Upper Silesian Region, Poland
www.mdpi.com/2073-4433/10/11/602/pdf

A Work Group Report on Ultrafine Particles (AAASI) Why Ambient Ultrafine and Engineered Nanoparticles Should Receive Special Attention for Possible Adverse Health Outcomes in Humans
Tire dust is pollution, and this invention will help vehicles clean up as they go:
Appendix AA is part of the proposed Plan, which the EIR analyzes. Therefore, the EIR does not need to include Appendix AA because, by default, it is part of the Plan analysis. A description of conservation efforts as a key component of SANDAG’s Sustainable Communities Strategy, including benefits to habitat preservation from the SCS land use pattern, has been added to Chapter 2 of the proposed Plan.

RESPONSE TO COMMENT 3-2
An analysis of biological impacts has been provided in Section 4.4, Biological Resources, of the EIR that addresses “hotspot resources,” including sensitive vegetation communities, endemic plants and animals, and special-status species. These hotspot resources are conserved through the NCCPs and subregional plans, the approved documents of which are described in the EIR (see Section 4.4.2 of the EIR), and addressed in Impact BIO-4. For example, the California’s NCCP Program focuses largely on conserving large areas of native habitat and the habitats that link those areas to help preserve California’s native fauna and flora at the landscape and regional levels. While NCCPs are governed by the California NCCP Act, the FESA requires the issuance of HCPs. The proposed Plan protects the County’s sensitive biological resources through consistency with the NCCPs, and commits to funding and implementing future conservation efforts, including $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8, Greenhouse Gas Emissions, of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).

RESPONSE TO COMMENT 3-3
The proposed Plan meets SB 375 requirements. The proposed Plan is required to reduce GHG emissions from passenger vehicles and light-duty trucks by 19 percent per capita by 2035 compared to 2005 levels,
as mandated by SB 375. Implementation of the proposed Plan would not conflict with SB 375 emission reduction targets for 2035 because it would result in a 20 percent reduction in per capita CO$_2$ emissions from passenger cars and light-duty trucks from 2005 levels by 2035, which exceeds the 2035 target of a 19 percent reduction for the SANDAG region.

Also, SB 375 requires that the collective land use plans of the region identify areas sufficient to house all economic segments of the population. The 6th Cycle Regional Housing Needs Assessment (RHNA) Plan sets a strategy for sustainability that focuses housing and job growth in urban areas where there is existing and planned transportation infrastructure, protects the environment and helps ensure the success of smart growth land use policies by preserving sensitive habitat and open space, and addresses the housing needs of all economic segments of the population. In the long term, housing located near transit and jobs should provide opportunities for residents to take more trips by bus or train and live closer to where they work, reducing VMT and GHG emissions.

**RESPONSE TO COMMENT 3-4**

As an initial matter, this comment raises issues with the proposed Plan, not the Draft EIR.

Multiple resource topic discussions in the EIR and Appendix C, *Climate Change Projections, Impacts, and Adaptation*, acknowledge that increased temperatures and decreased rainfall will likely result in decreased plant productivity and reproduction. As fewer or less robust plants pull less carbon dioxide out of the atmosphere, soil erosion and loss will increase and there will be less carbon from dead plants available to become incorporated into the soil, thus reducing soil carbon sequestration. As such, SANDAG acknowledges that it is important to continue monitoring innovative new technologies and methods of increasing carbon storage and sequestration potential in the region. SANDAG, in collaboration with relevant resource agencies, will present additional details as a part of the Nature-Based Climate Solutions Program. As detailed in response to comment Borchmann 3-2, SANDAG has committed to funding future habitat conservation, land acquisition, and land management and monitoring to conserve and manage the County’s biodiversity in perpetuity.
My personal observation is the current SANDAG 2021 Regional Plan fails to meet the promises outlined in Appendix A.A, Regional Habitat Conservation Vision, and is unacceptable in its current form. Please do not allow a substandard Regional Plan by SANDAG diminish the unparalleled biodiversity hotspot characteristics in San Diego that are found nowhere else in the world. We are counting on SANDAG to honor the promises and opportunities identified in Appendix A.A to protect and preserve natural resources in San Diego for current, and future generations.

Thank you for thoughtful consideration of my personal comments.
Appendix P1. Response to Comments on the Draft EIR

COMMENT LETTER 4: MIKE BROWER

RESPONSE TO COMMENT 4-1
The comments in this letter relate to the contents of the proposed Plan, and not the analysis contained within the Draft EIR.

Many of the Complete Corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs.

SANDAG will continue to coordinate with Caltrans for detailed engineering and environmental studies for Managed Lanes projects.

Public safety impacts of the proposed Plan are discussed in Section 4.16, Transportation, of the Draft EIR, specifically under Impact TRA-3, which analyzes any increases in hazards due to design features.

RESPONSE TO COMMENT 4-2
Rural corridors, such as SR 67, include investments such as shoulder widening, curve realignment, and technology improvements to address safety and operational improvements to facilitate ingress/egress during peak travel and emergency evacuation conditions. The costs of the rural corridor projects in the proposed Plan range from $1M to approximately $700M.
RESPONSE TO COMMENT 4-3

SANDAG will rely on coordination with other agencies in California and the State Department of Transportation to integrate the selection of technology, collection methods, and account management. California has strict data privacy laws to protect consumer privacy. In line with this, SANDAG remains committed to protecting personal privacy, and it will be a strong consideration for SANDAG and other agencies around California when selecting technology and methods to administer the program.

RESPONSE TO COMMENT 4-4

The proposed Plan commits SANDAG to making investments to support the region’s transition to electric cars, trucks, and buses. As SANDAG develops vehicle and infrastructure programs, it will continue to coordinate with SDG&E as well as community choice energy (CCE) providers in the region on their programs to provide clean power and manage load. San Diego Community Power is committed to providing entirely clean and renewable electricity by 2035 or sooner, and the State requires utilities, including SDG&E, to provide a minimum of 50 percent renewable power by 2030 leading up to the State’s carbon neutrality goal for 2045.

In addition to regional scale load management that is led by the utility, CCEs, and larger power users, SANDAG’s EV programs will encourage the use of load management tools and integrated renewable energy at the project level. SANDAG’s current EV charger rebate program is the CALeVIP San Diego County Incentive Project, with information available at https://calevip.org/incentive-project/san-diego-county. This and future charger programs will provide rebates for workplace chargers to enable a greater number of drivers to charge during the day when renewable energy is most available.

SANDAG continues to support progress toward an adequate EV charging infrastructure for both freight and passenger vehicles in collaboration with public agency and private industry stakeholders. This support includes planning through the Comprehensive Multimodal Corridor Plans (CMCPs) that include federally designated zero-emission vehicle corridors and commensurate charging infrastructure as well as the development of a Blueprint for Medium-/Heavy-Duty (MD/HD) ZEV Infrastructure. A SANDAG Board resolution was passed to work collaboratively to establish the framework and agreement for a joint EV
charging incentive program with the California Energy Commission, County Air Pollution Control District, and Center for Sustainable Energy as part of the Regional Vehicle Charging Program partnership program. SANDAG will continue to coordinate with Caltrans in their efforts to plan the deployment of potential medium- and heavy-duty truck charging infrastructure in conjunction with parking identified through the California State Truck Parking Study that is currently underway.

RESPONSE TO COMMENT 4-5

Regarding commuter rail along the I-15 corridor, the I-15 Corridor is difficult to serve with rail because of the development patterns that resulted in widely spread out communities. This area is served by Rapid bus routes, which will be expanded in the future with more services. However, the California High Speed Rail project is reflected in Figure 2.3 of the proposed Plan as it is slated to connect Los Angeles to San Diego via the Inland Empire with stations planned in Murrieta/Temecula and Escondido, which would provide some rail service in the vicinity of I-15. This project would be implemented and funded by the California High Speed Rail Authority. SANDAG will track the project as it is developed by the State.

RESPONSE TO COMMENT 4-6

Mobility Hubs will be centers of activity where transportation investments of the proposed Plan will come together along with strategic decisions about land use. Each Mobility Hub will require different services and amenities depending on the surrounding community. SANDAG will work closely with local jurisdictions, community members, and other stakeholders within each Mobility Hub area to identify specific needs of the area, such as safety, security, accessibility, first-last mile connections, and increased amenities. Each regional Mobility Hub coverage area was identified based on a variety of factors, including existing and projected population and job growth along with information on where and how people travel. Many existing trip destinations fall within areas that have been identified as a regional Mobility Hub, yet some of these communities lack convenient transit service or safe streets to walk, bike, or use other micro-mobility options.

RESPONSE TO COMMENT 4-7

Various funding sources are being considered to implement the proposed Plan. The proposed Plan assumes local, State, and federal
revenue sources including sales tax, impact fees, fuel tax, tolls, passenger fares, fees, general funds, ridehailing service fees, a road usage charge, cap and trade, and financing. New sources of revenue such as the road usage charge or a new sales tax will be studied and will include input from the public and other stakeholders.

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals such as GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle – the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers. The study will determine how existing revenue currently funds different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources.

The road usage charge, which is being studied by both the federal and State governments, is being considered to replace an old tax system that is no longer relevant. SANDAG recognizes that this is a challenge and respects the concerns raised. SANDAG is committed to having authentic dialogues to work through the challenges and create a revenue system that is flexible, sustainable, equitable, and fair to all.

Fare subsidies would likely be attached to sales tax measures, but could be paid for by other sources as they become available.

Further details regarding funding and revenue can be found in Appendix V of the proposed Plan.

RESPONSE TO COMMENT 4-8

State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing VMT and GHG emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling, and public transit). These bold changes are necessary to address unprecedented challenges facing the region and state. SANDAG understands the near-term need for congestion relief and is working to
find near-term ways to implement flexible fleet pilot projects and expand service and frequency of public transportation.

**RESPONSE TO COMMENT 4-9**

SANDAG will maintain transparency with the public and stakeholders regarding funding sources for projects outlined in the proposed Plan through associated project and program implementation, in addition to activities related to the development of Plan updates.
Appendix P1. Response to Comments on the Draft EIR

thanks,

Jim Chagala

James Chagala & Associates
555 West Country Club Drive, #254
Escondido, CA 92026
760-751-2891

From: Turner, Jessica <jessica.turner@sdcounty.ca.gov>
To: Alyssa Burley (Valle De Oro) <alyssa@alysaburley.com>; Billie Jo Jannen (Campo)
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Cc: Teasdale, Lynnette <lynettetteasdale@sdcounty.ca.gov>; Christman, Scott <pct@sdcounty.ca.gov>

Subject: SANDAG’s 2021 Regional Plan

Good Afternoon,

Staff has requested that I send the below information.

If you have questions, please contact Lynnette Teasdale, Chief of Long Range Planning, at
lynettetteasdale@sdcounty.ca.gov.

Thank you,

Jessica Turner
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123
858-495-5336
NOTICE OF RELEASE OF SANDAG’s 2021 Regional Plan (Transportation)

Public Input on [Environmental Impact Report (EIR)] for 2021 Regional Transportation Plan (RTP)

Lead Agency: San Diego Association of Governments (SANDAG)

Notice: The draft EIR can be viewed at [Draft EIR (leftforward.com)]. Comments due October 11, 2021.

Project Description: SANDAG officially released the draft 2021 Regional Plan for public comment on May 28th – August 6th, 2021. The draft EIR reviews the effects the Regional Plan will have on the community, including factors such as air quality, noise, land use, and more. Preparing the EIR is a requirement of the California Environmental Quality Act.

Submit your comment

The draft EIR is available for public comment from August 27 through October 11, 2021. After the public comment period concludes, SANDAG will prepare written responses to comments in the final EIR, anticipated to be released in late 2021. Public comments are accepted:

- Online: [English | Español]
- Email: RegionalPlan.RTP@sandag.org
- Voice mail: 619.699.1934, toll free 877.777.5716 and TTY 619.699.1904
- Fax: 619.699.3995
- Mail: Attention: Kristen Uchitel, Associate Planner, SANDAG, 401 B Street, Suite 900, San Diego CA, 92101
RESPONSE TO COMMENT 5-1

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. The proposed Plan includes many strategies to reduce GHG emissions from light-duty vehicles.

Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth’s atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change (“climate destabilization”) are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of State legislation and EO B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor’s EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

The Draft EIR properly evaluates the significant environmental impacts of the proposed Plan and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6, Alternatives Analysis.
RESPONSE TO COMMENT 5-2

This comment provides background information about Reference 1, but does not identify any specific deficiencies in the EIR’s GHG impact analysis. SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. The proposed Plan includes many strategies to reduce GHG emissions from light-duty vehicles. Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth’s atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change (“climate destabilization”) are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of state legislation and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor’s EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.
RESPONSE TO COMMENT 5-3

This comment provides information about the California Democratic Party platform. The “Plan” noted in the comment is a policy position by a private organization and is not a “state plan.”
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 5-4

Consistent with CEQA requirements, the Draft EIR properly describes the proposed Plan, evaluates the significant environmental impacts of the proposed Plan, and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.

RESPONSE TO COMMENT 5-5

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. The proposed Plan includes many strategies to reduce GHG emissions from light-duty vehicles. Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth's atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change ("climate destabilization") are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego Region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of State legislation and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor’s EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.
RESPONSE TO COMMENT 5-6

In the Draft EIR, SANDAG properly evaluates the significant environmental impacts of the proposed Plan and concludes that the proposed Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6. Also, please see response to comment Bullock 5-5.
RESPONSE TO COMMENT 5-7

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. Draft EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth’s atmosphere and contribute to global warming. The Draft EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change (“climate destabilization”) are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego Region provided in Draft EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of State legislation and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor’s EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

The purpose of the Draft EIR is “to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided” (PRC Section 21002.1[a]). The Draft EIR analyzes the significant environmental effects of the proposed Plan, identifies feasible mitigation measures to avoid or reduce these impacts, and presents alternatives to the proposed Plan that could avoid or reduce significant impacts.

In the Draft EIR, SANDAG properly evaluated the significant environmental impacts of the proposed Plan and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identified mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.
RESPONSE TO COMMENT 5-8
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.
SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D to the proposed Plan. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG’s peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.
Where possible, the Plan proposes repurposing of general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network. Improvements to the freeway system in the proposed Plan are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and high occupancy vehicle travel.

RESPONSE TO COMMENT 5-9
This comment addresses the proposed Plan and aforementioned information about Reference 1. No further response is required.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 5-10
Draft EIR Section 4.16 (Impact TRA-2) properly analyzed whether the proposed Plan would achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals, finding a significant and unavoidable transportation impact. Nevertheless, Impact TRA--2 does show that the proposed Plan would achieve substantial reductions in per capita VMT.

RESPONSE TO COMMENT 5-11
This comment addresses the proposed Plan and aforementioned information about Reference 1. Also, please see response to comment Bullock 5-7.

RESPONSE TO COMMENT 5-12
The purpose of the Draft EIR is "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided" (PRC Section 21002.1[a]). Consistent with CEQA requirements, the Draft EIR analyzes the significant environmental effects of the proposed Plan, identifies feasible mitigation measures to avoid or reduce these impacts, and presents alternatives to the proposed Plan that could avoid or reduce significant impacts.

The Draft EIR properly evaluates the significant environmental impacts of the proposed Plan, including a net-zero significance threshold (Impact GHG-1), and concludes that the Plan would have significant and unavoidable GHG emissions impacts (Impact GHG-5). The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

The proposed Plan was developed through a data driven planning process. The forecasted development pattern for the proposed Plan’s SCS is driven by regional goals for sustainability, mobility, housing affordability, and economic prosperity. The SCS land use pattern uses areas in the region known as Mobility Hubs to concentrate future development. Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. The SCS land use pattern represents a continuing trend in the San Diego region to provide more housing and job opportunities in the existing urbanized areas of the region.
RESPONSE TO COMMENT 5-14

SB 375 required CARB to set regional targets for reducing GHG emissions from passenger vehicle use. SANDAG’s State-mandated target is to reduce regional emissions of GHGs from cars and light trucks by 15 percent, per capita, by 2020, compared with a 2005 baseline (CARB 2017). By 2035, a 19 percent reduction is required. The Sustainable Communities Act does not require CARB to establish post-2035 targets.

To achieve the targets, SANDAG and other MPOs are required to develop an SCS as a component of the RTP. The SCS is required by Government Code Section 65080(b)(2)(B) to:

- Identify the general location of uses, residential densities, and building intensities within the region.
- Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population.
- Identify areas within the region sufficient to house an 8-year projection of the regional housing need for the region.
- Identify a transportation network to serve the transportation needs of the region.
- Gather and consider the best practically available scientific information regarding resource areas and farmland in the region.
- Consider specified State housing goals.
- Set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks, to achieve, if there is a feasible way to do so, the GHG emission reduction targets approved by CARB.
- Allow the RTP to comply with federal Clean Air Act requirements related to air quality conformity.

Appendix D of the proposed Plan documents compliance with these SCS requirements and provides SCS-related background information.

RESPONSE TO COMMENT 5-15

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

RESPONSE TO COMMENT 5-16

In the Draft EIR, SANDAG properly evaluated the significant environmental impacts of the proposed Plan and concludes that the Plan would have significant and unavoidable GHG emissions impacts.
The Draft EIR then identified mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see Draft EIR Section 4.8 and Chapter 6.

SANDAG developed a *Parking Strategies for Smart Growth* guide, referenced on page 4.16-13 of the Draft EIR, as part of its *Planning Tools for the San Diego Region*. This guide provides a benchmark and compares the various parking regulations within the region, as well as how those regulations compare to national standards. Additionally, the guide provides example policies on how jurisdictions can implement smart growth parking policies and programs. SANDAG also developed a regional Parking Management Toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals. One of the proposed Plan’s implementation strategies includes updating the Toolbox to account for newer modes and more flexible curb space strategies.

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.
RESPONSE TO COMMENT 5-17

This comment addresses the Draft EIR Executive Summary, Table ES-1, Summary of Environmental Impacts and Mitigation Measures (pages ES-1 to ES-24) and asserts that achieving the GHG emissions reductions level of Impact GHG-3 (at least 30 percent reduction in per capita GHG emissions from the entire on-road transportation sector by 2035 compared to existing conditions [2016]) would not be consistent with reducing emissions 80 percent below 1990 levels by 2030, which the commenter refers to as the “industrialized world’s 2030 climate stabilizing requirement.” As explained in the Draft EIR (page 4.8-28), Impact GHG-3 is based on the target that the SANDAG Board of Directors asked staff to consider when drafting the 2021 Regional Transportation Plan (SANDAG Board Resolution No. 2021-17).

Moreover, the Draft EIR also includes four other significance criteria to evaluate GHG emissions generated under implementation of the proposed Plan, including Impact GHG-5, which evaluates regional GHG emissions under proposed Plan implementation using California’s targets and goals for Statewide GHG emissions reductions. Specifically, Impact GHG-5 evaluates whether implementation of the proposed Plan would be inconsistent with the State’s ability to achieve the Statewide 2030 reduction target of SB 32 and the long-term reductions goals of EO B-55-18 (statewide carbon neutrality no later than 2045) and EO S-3-05 (statewide emissions levels reduced 80 percent below 1990 levels by 2050).

This comment also addresses Impact GHG-5 in Table ES-1, and asserts that the GHG mitigation measures summarized in the table are too vague, with a specific reference to mitigation measure TRA-2, Achieve Further VMT Reductions for Transportation and Development Projects. As explained on Draft EIR page ES-3, this table provides a summary of environmental impacts and mitigation measures to avoid or reduce significant impacts. The full text of mitigation measure TRA-2, which includes a detailed list of project-level VMT reduction measures that SANDAG shall, and the County of San Diego, cities, and other local jurisdictions can and should, implement during the project design and project-level CEQA review phase of transportation network improvements and land development projects (Draft EIR pages 4.16-53 to 4.16-54). No further response is required.
Please refer to Master Response 1 for discussion regarding accelerating elements of the Plan. There are constraints on when money becomes available during the lifespan of the proposed Plan. The SANDAG Board of Directors may review the TransNet ordinance and discuss possible updates. This process is outside of the development the proposed Plan. This comment and your support for Alternative 3 is noted for the record and will be forwarded to the SANDAG Board of Directors for its consideration prior to making a decision on adoption of the proposed Plan.

RESPONSE TO COMMENT 5-19

Implementation of the proposed Plan would result in a 20 percent reduction in per capita CO₂ emissions from passenger cars and light-duty trucks from 2005 levels by 2035, which exceeds the 2035 target of a 19 percent reduction set by CARB for the SANDAG region. As discussed in Section 4.8 of the EIR, however, the proposed Plan’s GHG emissions would be inconsistent with the State’s ability to achieve the goals of EO B-55-18 and S-3-05. Mitigation measures would help reduce regional GHG emissions by reducing VMT, increasing use of zero-emission fuels, sequestering carbon from the atmosphere, and other measures; they would reduce inconsistency of the proposed Plan’s GHG emissions with the State’s ability to achieve the SB 32, EO B-55-18, and EO S-3-05 GHG reduction goals. However, implementation of the many other changes required to achieve these goals is beyond SANDAG’s and local agencies’ current jurisdiction and authority. As such, impacts were identified as significant and unavoidable.
Appendix P1. Response to Comments on the Draft EIR

Thank you for providing the included resources for SANDAG’s consideration. Between now and 2050, it is anticipated that the drive alone mode share will be significantly reduced. Cars will still play a part in the mobility ecosystem, but effective parking and curb management strategies will be needed as multimodal options within communities increase. The key will be to make the right amount of parking available when it is needed and price it so that alternative commutes are encouraged, and accessibility, equity, and economic development are promoted. Tiered pricing will need to be implemented; for example, free and lower priced parking in outlying, more suburban communities including “gateway” (i.e., end-of-line Transit Leap stations) compared to market-rate pricing in our urban core and other denser communities.

Parking Management is one of the key policy areas included in the proposed Plan. As part of the Plan, SANDAG has designated program funding towards working with local jurisdictions to implement parking management strategies such as parking pricing. In addition, SANDAG develops technical resources to provide jurisdictions with guidance on implementing parking policies, such as the 2014 Parking Management Toolbox. One of the proposed Plan’s implementation strategies includes updating the Toolbox to account for newer modes and more flexible curb space strategies.

**RESPONSE TO COMMENT 5-20**

Appendix C, Climate Change Projections, Impacts, and Adaptation, of the EIR describes how climate may change in the San Diego region in the future due to the effects of global warming, and how those changes could affect each of the resource areas discussed in the EIR. The EIR sections evaluate whether the proposed Plan would exacerbate a climate change impact (e.g., creating more housing development in high wildfire risk zones).

**RESPONSE TO COMMENT 5-22**

The Plan proposes a Transportation Demand Management Ordinance that would require employers over a certain size to provide transportation benefits and amenities that encourage sustainable transportation choices. These types of TDM ordinances exist in other regions across the state. A near-term implementation action is to complete a Transportation Demand Management Ordinance Policy Analysis. This policy analysis would detail the employers that the
Appendix P1. Response to Comments on the Draft EIR

This comment addresses the discussion of “Global Climate Change” in Draft EIR Section 4.8.1 (page 4.8-1) and asserts that additional context should be included in this section, including comparison of existing emissions concentrations to pre-industrial levels and information about climate “destabilization” or “tipping points.” This section of the DEIR has been revised as follows to include additional information on the latest climate change science as reported by the IPCC in August 2021.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution. According to the Intergovernmental Panel on Climate Change (IPCC), human influence has warmed the climate at a rate that is unprecedented in at least the last 2000 years (IPCC 2021). In addition, the IPCC reported with high confidence that in 2019 CO2 concentrations were higher than at any time in at least 2 million years, and reported with very high confidence that 2019 concentrations of CH4 and N2O were higher than at any time in at least 800,000 years (IPCC 2021). Rising atmospheric concentrations of GHGs in excess of natural levels enhance the greenhouse effect, which contributes to global warming of the Earth’s lower atmosphere. This warming induces large-scale changes in ocean circulation patterns, precipitation patterns, global ice cover, biological distributions, and other changes to the Earth’s system that are collectively referred to as climate change.

The scale of recent changes across the climate system as a whole and the present state of many aspects of the climate system are unprecedented over many centuries to many thousands of years (IPCC 2021). The IPCC also reports that many changes in the climate system become larger in direct relation to increasing global warming, including increases in the frequency and intensity of hot extremes, marine heatwaves, and heavy precipitation, agricultural and ecological droughts in some regions, and proportion of intense tropical cyclones, as well as reductions in Arctic sea ice, snow cover, and permafrost (IPCC 2021). In addition, low-likelihood outcomes, such as ice sheet collapse, abrupt ocean circulation changes, some compound extreme events and warming substantially larger than the assessed very likely range of future warming cannot be ruled out (IPCC 2021). Climate change impacts in this analysis are evaluated in the relevant resource sections (e.g., climate change effects

RESPONSE TO COMMENT 5-23

This comment addresses the discussion of “Global Climate Change” in Draft EIR Section 4.8.1 (page 4.8-1) and asserts that additional context should be included in this section, including comparison of existing emissions concentrations to pre-industrial levels and information about climate “destabilization” or “tipping points.” This section of the DEIR has been revised as follows to include additional information on the latest climate change science as reported by the IPCC in August 2021.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution. According to the Intergovernmental Panel on Climate Change (IPCC), human influence has warmed the climate at a rate that is unprecedented in at least the last 2000 years (IPCC 2021). In addition, the IPCC reported with high confidence that in 2019 CO2 concentrations were higher than at any time in at least 2 million years, and reported with very high confidence that 2019 concentrations of CH4 and N2O were higher than at any time in at least 800,000 years (IPCC 2021). Rising atmospheric concentrations of GHGs in excess of natural levels enhance the greenhouse effect, which contributes to global warming of the Earth’s lower atmosphere. This warming induces large-scale changes in ocean circulation patterns, precipitation patterns, global ice cover, biological distributions, and other changes to the Earth’s system that are collectively referred to as climate change. The scale of recent changes across the climate system as a whole and the present state of many aspects of the climate system are unprecedented over many centuries to many thousands of years (IPCC 2021). The IPCC also reports that many changes in the climate system become larger in direct relation to increasing global warming, including increases in the frequency and intensity of hot extremes, marine heatwaves, and heavy precipitation, agricultural and ecological droughts in some regions, and proportion of intense tropical cyclones, as well as reductions in Arctic sea ice, snow cover, and permafrost (IPCC 2021). In addition, low-likelihood outcomes, such as ice sheet collapse, abrupt ocean circulation changes, some compound extreme events and warming substantially larger than the assessed very likely range of future warming cannot be ruled out (IPCC 2021). Climate change impacts in this analysis are evaluated in the relevant resource sections (e.g., climate change effects...
to water supply are discussed in Section 4.18, *Water Supply,* and climate change’s influence on wildfire are discussed in Section 4.19, *Wildfire,* and similarly for other sections) and covered in detail in the *Climate Change Projections, Impacts and Adaptation* report in Appendix C.

**RESPONSE TO COMMENT 5-24**

The commenter asserts that the Mobile Source Strategy, which is a plan prepared by CARB to identify the level of transition to cleaner mobile source technologies needed to achieve California air quality, climate change, and community risk reduction goals, does not include a “2030 climate-stabilizing target of 80% below our 1990 level.” The 2020 Mobile Source Strategy was approved by the CARB Board on October 28, 2021. This comment is not related to the adequacy of the Draft EIR and no further response is required.

**RESPONSE TO COMMENT 5-25**

This comment references OPR’s Discussion Draft report on CEQA and Climate Change and asserts that “a project that will have significant impacts on driving” is required to “conform to a plan showing how LDVs (light-duty vehicles) can achieve our climate-stabilizing targets...” Refer to response to comment Bullock 5-22, which explains that the Draft EIR includes Impact GHG-5, which evaluates regional GHG emissions under proposed Plan implementation using California’s targets and goals for statewide GHG emissions reductions. Specifically, Impact GHG-5 evaluates whether implementation of the proposed Plan would be inconsistent with the State’s ability to achieve the statewide 2030 reduction target of SB 32 and the long-term reductions goals of EO B-55-18 (statewide carbon neutrality no later than 2045) and EO S-3-05 (statewide emissions levels reduced 80 percent below 1990 levels by 2050).
The proposed Plan is required to reduce GHG emissions from passenger vehicles and light-duty trucks by 19 percent per capita by 2035 compared to 2005 levels, as mandated by SB 375. Reducing GHG emissions and achieving State goals related to carbon neutrality requires actions at all levels of government. SANDAG looks to support and encourage local jurisdictions, State agencies, and other partners to reduce emissions beyond what is achieved by the proposed Plan. The proposed Plan would provide travelers with more travel and mobility options in residential and employment centers that can lead to a reduction in VMT.

RESPONSE TO COMMENT 5-27
This comment addresses Draft EIR Chapter 7, Other Considerations Required by CEQA, Section 7.2.9, which evaluates GHG emissions impacts under a maximum theoretical buildout scenario, and asserts that “state mandates” are insufficient to reduce 2030 emissions to no more than 80 percent below 1990 emissions levels. Refer to response to comment Bullock 5-22, which explains that the Draft EIR includes Impact GHG-5, which evaluates regional GHG emissions under proposed Plan implementation using California’s targets and goals for statewide GHG emissions reductions. Specifically, Impact GHG-5 evaluates whether implementation of the proposed Plan would be inconsistent with the State’s ability to achieve the statewide 2030 reduction target of SB 32 and the long-term reductions goals of EO B-55-18 (statewide carbon neutrality no later than 2045) and EO S-3-05 (statewide emissions levels reduced 80 percent below 1990 levels by 2050).
Thank you again for your participation in the environmental review process and for the detailed comments for SANDAG’s consideration. Please continue to follow along in this process by visiting SDForward.com.

RESPONSE TO COMMENT 5-29

SANDAG has reviewed the attached reference documents and responded above to those Draft EIR comments that cite or use information from these reference documents. No responses to the attachments specifically have been included because they do not contain comments specific to the EIR and/or proposed Plan.
COMMENT LETTER 6: CLIMATE ACTION CAMPAIGN

October 11, 2021
SANDAG Regional Plan EIR
C/O Kirsten Lichtel, Associate Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: Climate Action Campaign Comments, Draft Environmental Impact Report for San Diego Forward: The 2021 Regional Plan

Dear Kirsten Lichtel,

Climate Action Campaign is a watchdog organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action.

On behalf of Climate Action Campaign, I am writing to comment on Section 4.8, which evaluates the potential impacts of the proposed Plan related to greenhouse gas emissions.

The most up to date climate science states that we must achieve Zero Carbon as soon as possible to stave off the most devastating impacts of the climate crisis, such as wildfires, dangerous air quality, extreme heat, sea-level rise, and more. These have and will impact the San Diego region’s Communities of Concern first and worst.

Transportation accounts for 40% of the region’s greenhouse gas emissions, more than any other sector by far. As such, we are pleased to see that the draft 2021 Regional Plan is aligned with the CARB-mandated 19% emissions reduction from the transportation sector from 2035 levels by 2035, per SB 375.

However, as outlined in impact GHG-5, this Plan is inconsistent with SB 32, and with Executive Orders S-3-05 and B-55-18.

We are aware that achieving these targets will require unprecedented action in every sector and at all levels of government. However, SANDAG will need to oversee the near elimination of emissions from the transportation sector in San Diego, by mid-century. This Plan alone will not achieve that goal.

State experts have made it clear that aggressive VMT reduction is needed to achieve state climate goals. We urge SANDAG to put the region on track to achieve a Zero Carbon region in this and future Regional Plans by further maximizing investments in VMT-reduction strategies and mode shift away from fossil fuel cars and into bike, walk, and transit. These investments must be prioritized in historically underinvested Communities of Concern.

RESPONSE TO COMMENT 6-1

Thank you for your comment. SANDAG appreciates your input and support of the proposed Plan.

RESPONSE TO COMMENT 6-2

As noted in the comment and as detailed in Section 4.8, Greenhouse Gas Emissions, the proposed Plan would be inconsistent with the State’s ability to achieve the goals of SB 32, EO B-55-18, and S-3-05. The comment also states that the proposed Plan alone will not achieve these goals. As discussed under Impact GHG-5, additional mitigation measures have been identified at the Plan- and project-specific levels to substantially lessen the amount of proposed Plan GHG emissions in 2030, 2045, and 2050. Furthermore, as discussed in Chapter 2, Project Description, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region’s progress toward the State’s goal of carbon neutrality by 2045.

This comment addresses the proposed Plan and is not related to the adequacy of the EIR.

RESPONSE TO COMMENT 6-3

This comment addresses the proposed Plan and is not related to the adequacy of the EIR.

SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors in advance of approval of the proposed Plan to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, are reflected in Appendix A, Attachment 1 of the proposed Plan.
Finally, critical to a more sustainable, equitable region is increased affordable housing at existing and future transit stops. The Sustainable Communities Strategy should include a suite of aggressive policies that stop sprawl and support infill. Smart land use is essential to slashing emissions.

This plan represents an important first step in the shift away from auto-centric planning, and towards a more climate-just, climate-ready transportation future. We look forward to continued engagement with this critical plan, to ensure it is as strong as possible for climate action.

Sincerely,
Noah Harris,
Policy Advocate
Climate Action Campaign

RESPONSE TO COMMENT 6-4
This comment addresses the proposed Plan and is not related to the adequacy of the EIR.
Appendix B of the proposed Plan presents the Implementation Action strategies proposed to incentivize sustainable growth and development in the San Diego region.

RESPONSE TO COMMENT 6-5
Thank you for your participation in this process and for your organization’s support of the proposed Plan.
COMMENT LETTER 7: CITY OF CARLSBAD

RESPONSE TO COMMENT 7-1

This comment includes opening remarks and describes prior letters submitted to SANDAG. No further response is required.

RESPONSE TO COMMENT 7-2

This comment largely describes the CEQA framework under which the proposed Plan and Final EIR have been developed. The Final EIR informs decisionmakers and the public generally of the significant environmental effects of the proposed Plan, identifies ways to minimize the significant effects, and describes reasonable alternatives to the proposed Plan (CEQA Guidelines Section 15121(a)). The Final EIR properly considers cumulative impacts (CEQA Guidelines Section 15168(b)(2)), identifies a baseline (CEQA Guidelines Section 15125), describes a range of reasonable alternatives to the proposed Plan (CEQA Guidelines Section 15126.6), and describes feasible mitigation measures that would minimize significant adverse environmental impacts (CEQA Guidelines Section 15126.4).
This comment inaccurately characterizes the 5 Big Moves as a material change to the scope of the project in the NOP issued on November 14, 2016. In fact, the 5 Big Moves are planning strategies used to develop the proposed Plan, which consists of the Regional Transportation Plan and Sustainable Communities Strategy that identify the San Diego region’s future transportation investments and growth through 2050 as described in the NOP.

The statement that the public and affected agencies have been denied the opportunity to provide SANDAG with specific detail about the significant environmental issues and reasonable alternatives and mitigation measures is also inaccurate. As noted by the comment, SANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of a NOP. Receipt of the NOP by the State Clearinghouse (Clearinghouse) at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017.

The NOP provided formal notification consistent with the CEQA Guidelines to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR will be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG with specific comments and questions on the scope and content of this EIR. Appendix A to the Final EIR summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

In addition, SANDAG noticed and held a public scoping meeting consistent with CEQA (PRC Section 21083.9), on December 8, 2016, at SANDAG’s office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

The comment also mischaracterizes the CEQA requirements for review of the Draft EIR. There is no CEQA requirement to conduct the public
comment period for the Draft EIR required by CEQA Guidelines Section 15087 simultaneously with the public comment period required by Government Code Section 65080 for the proposed Plan. There is also no CEQA requirement for comments on the Draft Plan to be responded to or incorporated into the Draft EIR. The Draft EIR properly evaluates the Draft Plan and preparation of each has run concurrently consistent with CEQA Guidelines Section 15004. SANDAG has evaluated comments received on environmental issues and prepared written responses consistent with CEQA Guidelines Section 15088. Responses to comments received on the Draft EIR are included herein (Appendix P.1 of this Final EIR).

RESPONSE TO COMMENT 7-4
This comment mischaracterizes the process for public participation in the Draft and Final EIRs. There is no CEQA requirement to conduct the public comment period for the Draft EIR required by CEQA Guidelines Section 15087 simultaneously with the public comment period required by Government Code Section 65080 for the proposed Plan. There is also no CEQA requirement for comments on the Draft Plan to be responded to or incorporated into the Draft EIR. The Draft EIR properly evaluates the Draft Plan and preparation of each has run concurrently consistent with CEQA Guidelines Section 15004. SANDAG has evaluated comments received on environmental issues and prepared written responses consistent with CEQA Guidelines Section 15088. Responses to comments received on the Draft EIR are included herein (Appendix P.1 of this Final EIR), and responses to comments received on the proposed Plan are included in Appendix P.2 of the Final EIR.

This comment also incorrectly asserts that the EIR uses faulty land use assumptions. Government Code Section 65080(b)(2)(B) provides that an SCS “use most recent planning assumptions considering local general plans and other factors.” It also requires that the SCS “set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board.” The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan.
Specific to public outreach conducted by SANDAG, there have been extensive opportunities for meaningful public participation in the proposed Plan and EIR. SANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of an NOP. Receipt of the NOP by the State Clearinghouse at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017. The NOP provided formal notification to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR will be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG with specific comments and questions on the scope and content of this EIR. Appendix A summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

Consistent with CEQA (PRC Section 21083.9), SANDAG noticed and held a public scoping meeting on December 8, 2016, at SANDAG’s office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a Public Involvement Plan (PIP) to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan.

The Draft EIR for the proposed Plan was released to the public on August 27, 2021, and was available for a 45-day public review period, as required by CEQA. SANDAG published a Notice of Availability (NOA) for the Draft EIR in local newspapers on August 27, 2021, and mailed the
NOA to an extensive distribution list. SANDAG also filed a Notice of Completion (NOC) with the State Clearinghouse to indicate the availability of the Draft EIR for public review and comment on August 27, 2021. The Draft EIR was distributed to the agencies, organizations, and individuals that provided written comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, and other interested parties and stakeholders. Agencies, organizations, and individuals were invited to provide written comments on the Draft EIR during the public review period from August 27 to October 11, 2021.

The Draft EIR and all appendices were available for review online at www.sdforward.com, at SANDAG offices located at 401 B Street, Suite 800, San Diego, California 92101, and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library will facilitate inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the Public Comment Period.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting where decision makers will consider certification of the Final EIR and adoption of the proposed Plan.
The following language has been added to Chapter 2 of the proposed Plan: “Land use authority is reserved for local jurisdictions under state law, and because they understand the unique needs of their communities and geographies.”

The comment inaccurately suggests that the City’s General Plan has been ignored in the developing the proposed Plan. SANDAG relied upon local general plans and other factors to develop the forecasted development pattern for the region consistent with Government Code Section 65080(b)(2)(B). Consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11, Land Use, of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

The Draft EIR identifies how it can be utilized for streamlining with later activities and/or for use with subsequent environmental analyses in Section 2.6.1.

Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

Government Code Section 65080(b)(2)(B) provides that an SCS “use most recent planning assumptions considering local general plans and other factors.” It also requires that the SCS “set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board.” The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and
Appendix P1. Response to Comments on the Draft EIR

policies in the Plan. As the comment notes, the SCS land use pattern focuses growth and development in the Mobility Hub areas.

In July 2018, SANDAG received the RHNA Determination from the California Department of Housing and Community Development, requiring that the region plan for 171,685 housing units during the sixth housing element cycle, which covers the years 2021 through 2029. As described on page 4.14-9 of the Draft EIR, the SANDAG Board of Directors adopted the 6th Cycle RHNA Plan in July of 2020, which allocates housing units to jurisdictions based on each jurisdiction’s share of transit and jobs within the region. The proposed Plan also accommodates the 6th Cycle RHNA Plan allocations consistent with Government Code section 65080(b)(2)(B).

This comment inaccurately asserts that the Draft EIR does not disclose analysis of VMT, GHG and air pollutant emissions, and inconsistencies with RAQs, SIP, and regional traffic modeling. The EIR evaluates each and the relevant identified impacts in Sections 4.3 (Air Quality), 4.8 (Greenhouse Gas Emissions), 4.11 (Land Use), 4.14 (Population and Housing), and 4.16 (Transportation), as well as Chapter 5 (Cumulative Impact Analysis), among others.

This comment also inaccurately asserts that the Draft EIR does not disclose the land use assumptions in the identified baseline for the proposed Plan. Section 3.3 describes the Existing Land Use and Development Patterns as of 2016, the year in which the NOP for this EIR was published. In addition, Figure 4.11-1 in Section 4.11 depicts the land use pattern for the entire San Diego region in 2016.

The comment inaccurately suggests that the City’s General Plan has been ignored in the developing the proposed Plan. SANDAG relied upon local general plans and other factors to develop the forecasted development pattern for the region consistent with Government Code Section 65080(b)(2)(B). The thresholds for land use analysis in Appendix G of the CEQA Guidelines include an evaluation of whether the project causes a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A conflict alone does not necessarily result in a significant environmental impact. As stated above, consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans or other local planning
documents. Consistency of individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.
In the draft PEIR, SANDAG should have evaluated and clearly articulated the Plan’s potential impacts on land use. Instead, the PEIR states that: “The forecasted development of the proposed Plan is based on the Series 14 Regional Growth Forecast SCS land use pattern, which is, in turn, based on the adopted general plans of the cities and County of San Diego and on the most recent planning assumptions, considering local general plans and other factors, as required by Section 373.” This statement is incorrect. The Plan is inconsistent with the city’s General Plan because it proposes residential land uses where such uses are not authorized by the General Plan. The PEIR appears to ignore this inconsistency in concluding there will be less than significant impacts for the years 2025, 2035, and 2050.

The city has two mobility hubs in the proposed Plan and draft PEIR: McCellan-Palomar Airport, the fifth largest employment center in the region; and Carlsbad State Beach and Carlsbad Village as “Tier 3 and Tier 4” employment centers. Attachment 1 shows a summary of the Mobility Hubs and housing units assumed in the Series 14 Growth Forecast for the year 2050. The assumptions in the updated Series 14 Growth Forecast contain inconsistencies with respect to at least three locations in which density is shown to be inconsistent with the City’s General Plans, the Airport Land Use Compatibility Plan and good planning principles. These three problematic areas are:

- 730 units on parcels immediately adjacent to the McCellan-Palomar Airport runway. The location of the airport within this mobility hub was shared with SANDAG staff multiple times at workshops. This is inconsistent with the regulations provided by the San Diego County Regional Airport Authority and conflicts with standard planning principles for assisting housing away from hazards.
- 1,775 units on existing developed resort properties and open space dedicated lands adjacent to Legoland; and
- 65 units in a preserved open space area.

The Plan proposes residential uses in areas which are not designated for such uses in the City’s General Plan. This inconsistency results in potential significant impacts with respect to land use, public safety and noise. (See CEQA Guidelines, Appendix G, §§ 15061, 15062, 15063.) Because residential use is not authorized in those locations in the City’s General Plan, the Plan’s assumptions that residential use will occur results in an overstatement of the extent to which other impacts, such as those associated with VMT, GHG and other pollutant emissions, will be reduced or unmitigated. The potential impacts of the Plan’s only meaningful evaluation is a brief qualitative description of the City of San Diego’s community plan process. However, the PEIR does not meaningfully address the inconsistency with the general plans of the other 17 member jurisdictions, which if not implementing this plan will cause a significant environmental impact due to the conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

As noted above, the Land Use, Hazards and Noise sections of the draft PEIR must include an evaluation of the inconsistencies with local land use plans. Multiple areas in Carlsbad are controlled as to their use and activity density and intensity through their spatial association with the McCellan-Palomar Airport. The McCellan-Palomar Airport is defined by the Federal Aviation Administration.
significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A conflict alone does not necessarily result in a significant environmental impact. As stated above, consistency of the proposed Plan with relevant General Plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 7-8

Proposed Plan Appendix F, *Series 14 Regional Growth Forecast and SCS Land Use Pattern*, details the development of the population and job growth projections that are reflected in the Draft EIR. The Series 14 Regional Growth Forecast aligns with the regional population projection from the California Department of Finance released in January 2020 and reflects population declines or lower population growth in certain areas in the region. These assumptions, described in Regional Plan Appendix F, include an increase in the region’s vacancy rate to 4 percent by 2030, an accounting of vacation rentals and second homes as “unoccupiable,” and a decrease in household size from 2.75 persons per household in 2016 to 2.62 persons per household by 2036. Data for all the counties in the United States show that as the population ages, household size declines, and the Series 14 Regional Growth Forecast assumes that due to the aging population in the region, a similar pattern will be observed. This is achieved by converging to household formation rates from the 2010 decennial census by 2030, which are held at that level through the end of the forecast.

With respect to SB 9, this State legislation was approved in September 2021 and will not take effect until January 1, 2022. The Series 14 Regional Growth Forecast incorporates assumptions for about accessory dwelling units (ADUs) occurring in the local jurisdictions as potential future capacity for housing unit development in recognition of recent legislation that had already been passed at the state level when the forecast was developed. ADUs were assumed to be available on 5 percent of all single-family lots in the region that were 5,000 square feet or larger. This equates to about 20,000 additional units of housing unit capacity throughout the region outside of the rural villages in the unincorporated area. This is consistent with a report from the San Diego Housing Commission that projected a rate of ADUs occurring on about 5 percent of available single-family zoned parcels. Including lots 5,000 square feet or larger ensures that ADUs are assumed to be possible in all areas of the region, including the more urbanized areas where lot size is smaller.

Specific to the SCS Land Use Pattern and its beneficial effects, SB 375 requires the SCS to “set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a
feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan by focusing growth and development in mobility hub areas. Here, the comment describes a speculative impact resulting from SB 9.

With respect to future development projects, the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). As a programmatic document encompassing the entire region, the proposed Plan and its EIR do not analyze project-specific impacts of future development projects implemented by the local jurisdictions or private developers.

RESPONSE TO COMMENT 7-9

This comment inaccurately generalizes the thresholds for land use analysis in Appendix G of the CEQA Guidelines. The thresholds do not include evaluating consistency with the “goals of the community,” but rather an evaluation of whether the project causes a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. To reflect the programmatic level of analysis and the unique characteristics of the proposed Plan, this EIR analyzed whether implementation of the proposed Plan would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation (including, but not limited to, the general plan, LCP, or zoning ordinance) and result in a physical change to the environment not already addressed in the other resource chapters of this EIR.

The thresholds for land use analysis in Appendix G of the CEQA Guidelines include an evaluation of whether the project causes a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A conflict alone does not necessarily result in a significant environmental impact. As stated above, consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans or other local planning documents. Consistency of
individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.

**RESPONSE TO COMMENT 7-10**

This comment asserts that the land use assumptions of the proposed Plan do not comply with State and federal mandates including SB 375, federal civil rights (Title VI) requirements, environmental justice considerations, air quality conformity, and public participation. The comment also asserts that CEQA Guidelines Section 15125 regarding discussion of the environmental setting in an EIR “helps establish the basis for compliance” with Government Code requirements regarding the planning assumptions of the proposed Plan’s SCS, and that existing general plan land use maps “should have been used as the most recent planning assumptions” to develop 2035 GHG targets set by CARB.

The proposed Plan has been prepared in compliance with applicable State and federal requirements, as explained below. Proposed Plan Appendix D describes how the proposed Plan fulfills the requirements of an SCS as described in SB 375, including requirements for public involvement. The proposed Plan’s compliance with SB 375 requirements for public involvement are further documented in proposed Plan Appendix G. Proposed Plan Appendix G also addresses how the proposed Plan’s Public Involvement Program is consistent with Title VI of the federal Civil Rights Act of 1964 (42 USC 2000d), Executive Order 12898 on Environmental Justice, and other relevant laws and guidance to ensure social equity, environmental justice, and accessibility in the planning process. Refer to proposed Plan Appendix H for information about social equity and the proposed Plan.

Proposed Plan Appendix F describes how data used to develop the SCS land use pattern are based on the most recent planning assumptions, considering local general plans and other factors, per SB 375 (Government Code Section 65080[b][2][B]). Contrary to the commenter’s assertion, CEQA requirements regarding discussion of the environmental setting in an EIR have no relationship to SB 375 requirements to use the most recent planning assumptions in an SCS.

Proposed Plan Appendix C describes how the proposed Plan complies with transportation air quality conformity determination requirements by providing a demonstration of conformity for the 2008 and 2015 ozone NAAQS for the proposed Plan.
RESPONSE TO COMMENT 7-11

Footnote 2 on page 4.16-1 of the Final EIR has been updated to include the following link which provides a detailed description of the background, data sources, methodologies, and outputs associated with ABM2+.


RESPONSE TO COMMENT 7-12

References to Appendix B have been added to pages 4.16-31, 4.16-35, and 4.16-39 of the Draft EIR. As the comment notes, the references have been added to direct the reader to the descriptions of the proposed transportation projects for each travel mode by horizon year.

The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed 2021 Regional Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review and will follow applicable laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 7-13

Appendix A of the proposed Plan has been revised to present proposed transportation projects for each travel mode by horizon year.

RESPONSE TO COMMENT 7-14

Due to data/survey availability, ABM2+ largely relies on pre-pandemic survey (2016/2017 household behavior, 2019 SB1 TNC, and 2015 transit onboard surveys); therefore, the pandemic’s impact on behaviors such as transit/carpool usage and auto ownership are not reflected in ABM2+. Based on information from the National Household Travel Survey, California Household Travel Survey, 2016/17 Household Behavior Survey, and the ACS, SANDAG developed a telework trend to project future telework rates. Researchers from the Institute of Transportation Studies at UC Irvine reviewed and confirmed the telework assumptions used in the proposed Plan. The increase of telework has a had steady increase that is reflected in ABM2+. It is
unclear what long-term travel behavior has changed as a result of the pandemic and if that change will be the “new normal.” SANDAG has a plan to update ABM2+ to ABM3 to reflect the “new normal” travel behaviors, once surveys conducted in a new normal year become available. The new normal condition is important for creating a long-range planning model. It is unclear at this moment, when and if the new normal has arrived and any modifications to the telework assumption used in ABM2+ would be speculative.

RESPONSE TO COMMENT 7-15
The proposed Plan includes a funding category for grade separations on the LOSSAN Corridor (included in Commuter Rail Route 398). Leucadia Boulevard grade separation is included in 2035 plus two yet to be determined locations by 2050. These would be determined at a later date. The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan is a programmatic document, and specific details concerning project alternatives will be evaluated during project-level environmental review (including Commuter Rail Route 398 project-level analysis).

RESPONSE TO COMMENT 7-16
Roundabouts, curb extensions, and similar traffic calming measures are included in the Mobility Hub complete streets investments as a means for slowing vehicular traffic in neighborhoods where a higher volume of multimodal travel to/from key destinations, particularly active transportation, is anticipated. The locations for these improvements are not defined in the proposed Plan and would be done in coordination with local jurisdictions.

RESPONSE TO COMMENT 7-17
The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan is a programmatic document, and specific details concerning project alternatives will be evaluated during project-level environmental review.
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RESPONSE TO COMMENT 7-18

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. This comment incorrectly asserts that the EIR uses faulty land use assumptions. Government Code Section 65080(b)(2)(B) provides that an SCS “use most recent planning assumptions considering local general plans and other factors.” It also requires that the SCS “set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board.” The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction targets when integrated with the transportation investments, programs, and policies in the proposed Plan.

With respect to SB 9, this State legislation was approved in September 2021 and will not take effect until January 1, 2022. The Series 14 Regional Growth Forecast incorporates assumptions about ADUs occurring in the local jurisdictions as potential future capacity for housing unit development in recognition of recent legislation that had already been passed at the state level when the forecast was developed. ADUs were assumed to be available on 5 percent of all single-family lots in the region that were 5,000 square feet or larger. This equates to about 20,000 additional units of housing unit capacity throughout the region outside of the rural villages in the unincorporated area. This is consistent with a report from the San Diego Housing Commission that projects a rate of ADUs occurring on about 5 percent of available single-family zoned parcels. Including lots 5,000 square feet or larger ensures that ADUs are assumed to be possible in all areas of the region, including the more urbanized areas where lot size is smaller.

This comment also inaccurately characterizes the discussion in Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3d 376. The Court does not state that CEQA requires an EIR to describe all reasonable alternatives to the project. Rather, the Court in Laurel Heights stated that “[a]n EIR’s discussion of alternatives must contain analysis sufficient to allow informed decision making” (Laurel Heights Improvement Assn. v. Regents of University of California (1988))
Moreover, CEQA Guidelines Section 15126.6 specifically states that “[a]n EIR need not consider every conceivable alternative to a project.”

Consistency of the proposed Plan with relevant general plans is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during subsequent project-specific CEQA reviews.

**RESPONSE TO COMMENT 7-19**

This comment mischaracterizes the requirements for a financially constrained RTP and inaccurately states that the implementation and challenges to fund the proposed Plan have not been appropriately discussed. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii)). New funding sources are revenues that do not currently exist or that may require additional steps before the MPO or transit agency can commit such funding to transportation project (2017 RTP Guidelines for MPOs). Strategies for ensuring their availability must be identified and future revenues may be projected based on historical trends, including consideration of past legislative or executive actions (2017 RTP Guidelines for MPOs). The level of uncertainty in projects based on historical trends is generally greatest for revenues in the “outer years” (10 years or more) of an RTP. Appendix V of the proposed Plan explains the anticipated revenues to fund implementation of the proposed Plan. Table V.3 describes the availability assumptions for new revenue sources identified in Appendix V.

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible.

**RESPONSE TO COMMENT 7-20**

Population and growth impacts are analyzed in Section 4.14 of the EIR. As stated on pages 4.14-16 and 4.14-17: “the regional growth and land use change forecasted in the proposed Plan would be implemented by local jurisdictions through local plans and individual development..."
projects, and most transportation network improvements would be implemented by transportation project sponsors other than SANDAG. The proposed Plan has been developed to accommodate forecasted regional growth and failing to do so would be inconsistent with the federal and State requirements for RTPs. In addition, precluding growth would conflict with the requirements to provide sufficient housing for the region’s population contained in SB 375. As discussed in Section 4.14.2, Government Code Section 65080(b)(2)(B)(ii) requires that the RTP/SCS must house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan.”

This comment also addresses future transit priority projects. As described above, future development projects would be implemented by local jurisdictions. CEQA Guidelines Sections 21155 through 21155.4 identify CEQA streamlining provisions for transit priority projects that are consistent with an MPO’s SCS that has been accepted by CARB. Figures D.8 and D.9 in Appendix D of the proposed Plan identify potential areas for transit priority projects. The proposed Plan is an iterative planning document that is typically updated every 4 years to account for new data, analysis, policy, and experience. SANDAG looks forward to coordinating with the City on future Plan updates.
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RESPONSE TO COMMENT 7-21

SANDAG has fully complied with the requirements of CEQA in the preparation of the Draft and Final EIRs for the proposed Plan.

Regarding disclosure of the proposed Plan’s physical impacts on the environment in the Draft and Final EIRs, SANDAG has disclosed impacts and identified mitigation measures for impacts on aesthetics and visual resources; agricultural and forestry resources; air quality; biological resources; cultural resources; energy; geology, soil, and paleontological resources; GHG; hazards and hazardous materials; land use; mineral resources; noise and vibration; population and housing; public services and utilities; transportation; tribal cultural resources; water supply; wildfire; and cumulative impacts, and has identified alternatives to the proposed Plan consistent with CEQA, the CEQA Guidelines, and the discussion in Friends of Mammoth v. Board of Supervisors (1972) 8 Cal.3d 247 referenced in the comment. For clarity with respect to the cited discussion in County of Inyo v. Yorty (1973) 32 Cal.App. 3d 795, the court states that an EIR is an “environmental ’alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return” (County of Inyo v. Yorty, p. 810). The court also cites an earlier version of PRC Section 21000, which states that the government of the state should “take all action necessary to alert decision-makers and the public to the environmental changes associated with the project,” contrary to the comment’s assertion.

Prior to consideration and certification of the Final EIR, and consistent with the discussion in Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3d 376, SANDAG will provide the SANDAG Board of Directors with a Final EIR completed in compliance with CEQA Guidelines Section 15132 that reflects SANDAG’s independent judgment and analysis as required by CEQA Guidelines Section 15090 (a). SANDAG will also present the SANDAG Board of Directors with Findings consistent with CEQA Guidelines Section 15091, a Statement of Overriding Considerations consistent with Section 15093, and a Mitigation Monitoring and Reporting Program consistent with Section 15097 prior to the SANDAG Board of Directors’ consideration of the proposed Plan and Final EIR.
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Attachments:
1. City of Carlsbad Comment Letter on Draft Regional Plan (Aug. 6, 2021)
2. City of Carlsbad Comment Letter – Regional Arterials (Sept. 30, 2021)

cc: Scott Chadwick, City Manager
Calia Brewer, City Attorney
Geoff Patnow, Assistant City Manager
Ron Kemp, Assistant City Attorney
Robby Contreras, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Pat Gomez, Deputy City Manager, Public Works
Mike Strong, Assistant Director, Community Development
Don Neu, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Lardy, Principal Planner
Scott Desswell, Senior Planner
Corey Park, Associate Planner
RESPONSE TO COMMENT 7-22

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.
Please see responses to L59 through L74 in Appendix P.2.
2. The city has three mobility hubs, associated with the Employment Centers published supporting the SANDAG Regional Plan. The McCallum-Palomar Airport is the fifth largest employment center in the region, with Carlsbad State Beach and Carlsbad Village as "Tier 3 and Tier 4" employment centers. The city thanks SANDAG for providing data for analysis to determine impacts and provide for accurate comments on the Plan. Attachment 2 shows a summary of the Mobility Hubs and housing units assumed in the Series 14 Growth Forecast for the year 2050. In summary:

a. The assumptions in the updated Series 14 Growth Forecast contain inconsistencies with the city's General Plan. The Carlsbad Palomar Major Employment Mobility Hub does include increases in density beyond what the citywide numbers appear to show when they are looked at in more detail.

i. There are three locations in which density is shown to be inconsistent with good planning principles, the city's General Plan and the Airport Land Use Compatibility Plan. The three most problematic areas (shown in Attachment 3) are:

1. 735 units on parcels immediately adjacent to the McCallum-Palomar Airport runway. The location of the airport within this mobility hub was shared with SANDAG staff multiple times at workshops. This is inconsistent with the regulations provided by the San Diego County Regional Airport Authority and conflicts with standard planning principles for siting housing away from hazards.

2. 2,735 units on existing developed resort properties and open space dedicated lands adjacent to Legoland.

3. 60 units in a preserved open space area.

ii. SANDAG should provide additional detail on why units were assumed in these areas, what planning principles those decisions were based on, and how SANDAG expects this to be implemented.

iii. Concentration of units in the mobility hubs alone appears to conflict with the direction received from the California Department of Housing and Community Development ("HCD") to implement new Affirmatively Furthering Fair Housing ("AFFH"), which seeks to combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice and opportunity for all Californians. The allocations of land use provided by SANDAG seem to focus all the higher density housing into one area of the city (this is one of the largest points of analysis that each jurisdiction in the region needs to respond to in order to receive a certified Housing Element.)

b. Additionally, looking at the detailed data provided by SANDAG, it is now clear why the citywide numbers only show moderate increases in population. Our analysis has shown that there is an assumed reduction of population by 2,500 persons in the areas within the city but outside of the mobility hubs. This is likely due to assumed reductions in persons per household over time, but SANDAG should clarify the source and understandings of this assumption. If housing is not provided consistent with these areas, it is still reasonable to assume persons per household will be reduced in 2050.

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1 SANDAG Website: Employment Centers, SANDAG PROJECTS, San Diegos Regional Planning Agency
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the local jurisdiction. The city still offers the following comments with the intent to support development of a defensible and realistic regional plan.

SECTION 1. CLARITY AND OTHER CONSIDERATIONS

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

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

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

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

San Diego Forward: The 2021 Regional Plan
Program Environmental Impact Report

Furthermore, this reduction in population is not limited to the City of Carlsbad. There is an approximately 80,000 reduction in population assumed outside of mobility hubs regionwide. SANDAG needs to address that is a reasonable assumption and if this will result in other impacts to public and private projects that will rely on this growth forecast, and the associated Activity Based Model (ABM) to project future impacts to transportation, GHG, air quality and noise.

d. The forecast has decreased in future population based on current trends, but it is not clear if there is enough housing provided with reductions and increases in some jurisdictions. Will the reduced amount of housing that will be provided result in an increased concentration of the affordability crisis?

e. There is a lack of clarity about how the Plan would be implemented at the municipal level. SANDAG should develop an approach for engaging with municipalities to ensure local support for delivering the regional transportation network. Staff from local jurisdictions must have the knowledge and ability to share where there are land use assumptions that conflict with planning and zoning laws. Our analysis focused on the City of Carlsbad, but if these types of assumptions are made regionwide, it presents flaws in the overall analysis. These flaws put the assumed reductions in vehicle miles traveled (VMT) and ability to implement the Regional Plan into question.

3. The area designated as controlled for use and activity density and intensity through its spatial association with the McClellan-Palomar Airport. The McClellan-Palomar Airport is defined by the Federal Aviation Administration (FAA) as a commercial service airport that, in addition to private aircraft, has regularly scheduled commercial flights to Los Angeles International Airport (LAX). The McClellan-Palomar Airport Land Use Compatibility Plan (ALUCP) is prepared according to FAA requirements and adopted by the San Diego County Regional Airport Authority acting as the Airport Land Use Commission for the County of San Diego.

a. The ALUCP provides measures to minimize the public’s exposure to excessive noise and safety hazards within areas around the airport and identifies areas likely to be impacted by noise and flight activity created by aircraft operations at the airport. These impacted areas include the Airport Influence Area (AIA), the Clear Zone, and the Flight Activity Zone.

b. Within the AIA, the ALUCP establishes six safety zones for the purpose of evaluating safety compatibility of new/future land use actions. The safety zone boundaries depict relative risk of aircraft accidents occurring near the airport and are derived from general aviation aircraft accident location data and data regarding the airport’s runway configuration and airport operational procedures. The ALUCP limits development intensities in these zones by imposing floor area and lot coverage maximums, by incorporating noise reduction measures in the design and construction of buildings, and/or by restricting certain uses altogether. For example, all residential and virtually all non-residential uses are considered incompatible land uses in some zones, while considered to be either compatible or conditionally compatible with the airport in other zones. Attachment 4 shows the McClellan-Palomar Airport noise contours and SANDAG’s proposed housing units.

c. If the proposed SANDAG land use assumptions are endorsed, an amendment to the city’s General Plan would be required to change the land use designation to Mixed-Use Commercial or residential land uses within the existing Business Park in order to offset the underlying assumptions of SANDAG staff. This is not a realistic
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assumption. Further, the protected airspace referenced in the AIA and the ALUCP must also be amended based on SANDAG’s regional planning assumptions. (The FAA establishes airspace protection zones in the airspace above and surrounding airports in order to protect aircraft from obstructions such as buildings, towers, etc., in navigable airspace.)

d. When a General Plan is adopted or amended, the allowable growth pattern of an area is identified and the expansion or updating of the various land use as specified in the General Plan can occur throughout the planning horizons. Without such growth considerations, the expansion or intensification of existing land uses could be considered “growth inducing.” Unplanned and uncontrolled growth may have significant adverse impacts on the environment. CEQA requires a discussion of how a “project” could increase population, employment or housing growth in surrounding areas and the impacts resulting from this growth. The CEQA Guidelines indicate that a “project” would normally have a significant effect on the environment if it would induce substantial growth or a substantial concentration of population.

4. At this point, it is not clear if SANDAG’s assumptions adequately contemplate the development patterns included in the Sustainable Communities Strategy (“SCS’), Regional Transportation Plan (“RTP”), and Regional Air Quality Strategy (“RAQS’), local climate action planning business-as-usual estimates, sub-regional traffic modeling, or the airspace assumptions of FAA and the ALUCP.

5. The city seeks clarity on the Plan’s underlying assumptions made to justify the proposed extensive high-speed rail network considering the significant changes in travel behavior which have occurred throughout the region as a result of the COVID-19 pandemic and due to the advancements in disruptive technologies such as telecommuting, autonomous vehicles, micro-transit, etc.

a. Recent North County Transit District (“NCTD”) Gaucher Ridership data show riders are not returning to riding the Gaucher in comparison to other modes of travel as shown in Attachment 5.

b. This question is consistent with comments made by SANDAG’s panel expert Bob Poole regarding the impact of the COVID-19 pandemic on transit ridership and mega-transit projects. (See comments by Bob Poole during the March 3, 2021 presentation to SANDAG planning at 1:30 p.m.: https://youtu.be/e40pYyKffKx RTH-5510)

6. The city seeks clarity on why an alternative analysis was not conducted with consideration of other transit alternatives such as automated/Shared vehicle technologies and personalized zero emissions transit programs that are capable of utilizing the existing regional freeway infrastructure in response to these new developments explained in the above comment.

7. The city seeks clarity on why the Plan does not incorporate policies to promote roundabouts over signalized intersections and include a budget line item under the Complete Corridors to fund the construction of roundabouts at new locations and to replace signalized intersections when found feasible. This clarification would support the Federal Highways Administration (“FHWA’’)’s project for Accelerating Roundabout Implementation in the United States and the County of San Diego Air Pollution Control Board’s support for implementing roundabouts to address OUD and reduce fatalities.

8. The city seeks clarity on the project phasing proposed within the Plan. Specifically, the city is seeking to understand the timing of implementation of unfunded Transit projects related to

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

9. The city seeks specific data on the proposed 300 miles of rail service contemplated in the Plan. To support this, the city is requesting that SANDAG input the information requested in Table 3 (Attachment B). Specific questions:
   a. Please provide more information about the scope of the high-speed rail alignments, potential vehicle technologies and their cost estimates.
   b. Will the Corridor keep the same rail alignment?
   c. What is the programmed or planned for the Carlsbad Village railroad trench and the other projects along the current ICTO/Coaster service right-of-way?
   d. Will some of the tracks be at grade with fencing and trains traveling at 110 miles per hour speeds?

SECTION 2: COMMENTS AND RECOMMENDATIONS

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

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

2. Appendix D: Sustainable Community Strategy Documentation:
   Appendix D includes the Sustainable Communities Strategy, which outlines assumptions included in the Activity-Based Model 2 (“ABM 2”), updated for this. This model will be necessary for use by publicly and privately initiated land use projects preparing documents for consistency with VMT/CEQA Guidelines and Traffic Impact Analysis (“TIM”) Evaluations. City staff respectfully request direction from SANDAG on how to conduct modeling with the service bureau and how to factor in these assumptions applied in ABM 2. Specifically, the addition of pricing, parking costs for coastal communities, 120% time-wasting and micromobility. SANDAG should provide direction on how this could be worked into General Plans that are updated every 5-20 years.

3. Appendix A: Transportation Projects, Programs, and Phasing:
   Trips to and from school sites result in a significant congestion, VMT generation, and peak hour delay throughout the region. Additional funding and projects should be recommended with a specific focus on improving safety and multimodal access to and around school sites along with programs to incentivize non-single occupancy vehicle trips to schools.
Table A.11: Given the proven success of the Carlsbad Connector micromobility pilot program, the city agrees with the Plan’s recommendations to provide similar on-demand micromobility systems throughout North County at all mobility hub sites and major transit centers.

Table A.12: The segment of El Camino Real between Poinsettia Lane and Camino Vida Roble is proposed to be widened from two to three lanes to enhance arterial standards. With the adoption of the city’s General Plan, the city has determined that the widening of this portion of El Camino Real is not feasible due to constrained right-of-way and would result in negative impacts to other travel modes. City staff recommend removal of this proposed project recommendation C83 (that is, a “do nothing” scenario), or appraise and evaluate different mobility projects and/or alternative designs.

The preferred Interstate-5 freeway alternative identified in the North Coast Corridor (“NCC”) Final EIR/EIS is the refined 8+2 Buffer alternative, with four freeway lanes and two managed lanes in each direction and completion by 2035. Appendix A, Table A.5 describes NCC project IDs CCD04, 007-089 as “8+2 to 6+4+ML” with completion by 2050. While this might lead to further study, it is not clear why there is a differential freeway configuration (i.e., reduction in freeway lanes) proposed. How does a reduction in lanes continue to meet NCC potential project benefits of maintaining or improving traffic operations and improving the safe and efficient regional movement of people and goods?

4. Active Transportation:

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

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

City staff look forward to working with SANDAG on improving mobility and land use access in the region and building sustainable, equitable and healthy modes of transportation, and we appreciate the opportunity to comment on the Plan that will help the region reach these goals.
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If you have any questions related to comments on the transportation network, please contact Tom Frank, Transportation Director/City Engineer, at Tom.Frank@carlsbadca.gov or if you need additional information related to comments on the land-use assumptions, please contact Eric Lardy, Principal Planner, at Eric.Lardy@carlsbadca.gov.

Sincerely,

JEFF MURPHY
Community Development Director

TOM FRANK
Transportation Director/City Engineer

Attachments:
2. City of Carlsbad Mobility Hubs
3. City of Carlsbad – Palomar Airport Road Mobility Hub Analysis
4. Palomar McClellan Airport Flight Paths
5. Recent RCTC Counter Height Data
6. Table 3 - Project Data Request
7. Table 3 - Detail of Proposed Rail Lines

cc: Scott Chadwick, City Manager
dela Brewer, City Attorney
Geoff Patnoe, Assistant City Manager
Ron Kemp, Assistant City Attorney
Robby Cerrievia, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Uci Gomes, Deputy City Manager, Public Works
Mike Strong, Assistant Director, Community Development
Doug Rau, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Lardy, Principal Planner
Scott Dennis, Senior Planner
Corey Funk, Associate Planner
Appendix P1. Response to Comments on the Draft EIR

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

Among other things, the regional transportation plan that is developed shall be an internally consistent document (GOV § 65080 (b)) and shall include a "sustainable communities strategy prepared by each metropolitan planning organization as follows" (GOV § 65080 (b)(1)(B)):

Each metropolitan planning organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 49 of, the Code of Federal Regulations, including the requirement to utilize the most recent planning assumptions considering local general plans and other factors. The sustainable communities strategy shall (i) identify the general location of uses, residential densities, and building intensities within the region, (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth, (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65536, (iv) identify a transportation network to service the transportation needs of the region, (v) gather and consider the best scientifically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65513.01, (vi) consider the state housing goals specified in Sections 65536 and 65537, (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7501).

The 2021 draft Regional Transportation Plan includes a Sustainable Communities Strategy ("SCS"), as required by SB 375 for the San Diego region (herein after called "Draft Regional Plan"). The draft Regional Plan indicates that SB 375 requires the SCS to include a pattern for forecasted growth and development that accomplishes the following: 1) When combined with the transportation network, the SCS will achieve the regional GHG emission-reduction targets; 2) The SCS accommodates the Regional Housing Needs Assessment ("RHNA") (determination); and 3) The SCS utilizes the most recent planning assumptions. (Reference p. 18 of the 2021 Regional Plan.)

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

The SANDAG Board of Directors approved the final RHNA plan with the final housing unit allocation on July 10, 2020, which was based on the most recent land use planning assumptions and an adopted methodology to allocate housing in accordance with GOV §§ 65534.040 and .041. The City of Carlsbad received a total RHNA allocation of 3,873 units as a result of RHNA plan adoption. The adopted April 6, 2021 city's Housing Element accommodates its housing needs through current zoning and other programs.

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

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

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

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

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

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

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

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August 6, 2021
The analysis of land use impacts for transportation projects is guided by FHWA Technical Advisory T-6640.8 and the CEQA Guidelines.

Under the FHWA Technical Advisory T-6640.8 (6)(j), Guidance for Preparing and Processing Environmental Impact Reports, states:

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

- The land use discussion should assess the consistency of the alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan required by Section 5303 U.S. Code § 134. The secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for each alternative, including adverse effects on existing communities. Where possible, the distinction between planned and unplanned growth should be identified.

There is also a requirement to analyze the land use planning inconsistencies per CEQA Guidelines § 15116.244], which specifies that an EIR for a proposed project include:

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

Since the new land use assumptions are being utilized, as described by this letter, the EIR that is prepared shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected. The following are the basic steps in analyzing land use impacts as part of the community/impact assessment process:
1. Inventory the existing land use patterns (including undeveloped land), development trends, and transportation systems. The inventory of existing land uses should include the following land use types: residential, commercial, industrial, recreational, institutional, public services, community services, emergency services, transportation, utilities, agriculture, and undeveloped land in the study area. The study area should include the surrounding community that is generally associated with the project area within which community impacts could occur. The inventory should also address development trends and identify recent developments in the study area to include the development's name, size, status (planned, built, under construction), and the jurisdiction in which it is located. A map showing the location of existing and planned land uses in the area should also be prepared.

2. Determine whether the project is consistent with local and regional policies that govern land use and development. For the consistency analysis, the policies and programs considered in the analysis should include: transportation plans and programs (MTPs/RTPs and MTPPs/RTPPs), regional growth plans, local General Plans that establish land use and growth management policies for the study area, and any specific or pipeline development proposals. This analysis should also include a discussion of consistency with the Coastal Zone Management Act of 1972, California Coastal Act of 1976, the National Wild and Scenic Rivers Act (16 USC 1271) and the California Wild and Scenic-Rivers Act (Pub. Res. Code § 5093.50 et seq.). After preparing a preliminary list of relevant plans to be considered in the analysis, the SANDAG planner should meet with the staff of the various agencies to review the list to determine if it is complete and revise the list as necessary.

3. Assess the changes that would occur in land uses and growth with and without the project.

4. The draft Regional Plan and each project alternative should be considered separately since the results may be different.

5. Develop measures to avoid, minimize, and/or mitigate potential adverse effects.

The resulting environmental analysis should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the proposed project. These plans and policies are normally reflected in local General Plans. If found to be consistent, then the findings in the EIR should be documented in the report and no further analysis or action is necessary. When found not to be consistent with a policy or program, then consideration must be given to modifying the draft Regional Plan alternative to make it consistent, or measures to address the inconsistency must be developed. SANDAG should be actively engaged in the development of measures to address these issues and be prepared to assess the consistency of the draft Regional Plan and alternatives with the comprehensive development plans adopted for the area and (if applicable) other plans used in the development of the transportation plan required by section 23 U.S. Code § 134. For any new land use growth assumptions, the secondary social, economic, and environmental impacts of any substantial, foreseeable, induced development should be presented for the draft Regional Plan and each alternative, including adverse effects on existing communities. The results should be shared with the public during the public involvement process, e.g., at community meetings, etc. Public input should be considered by SANDAG and if necessary, the findings of the analysis should be revised to reflect information gained through the public involvement process.
Appendix P1. Response to Comments on the Draft EIR
Appendix P1. Response to Comments on the Draft EIR
## Appendix P1. Response to Comments on the Draft EIR

### San Diego Forward: The 2021 Regional Plan

**Program Environmental Impact Report**

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**Please note:** Preliminary membership data - unanticipated and subject to adjustments.

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### San Diego Forward: The 2021 Regional Plan

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### San Diego Forward: The 2021 Regional Plan

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<td>9,086</td>
<td>8,160</td>
<td>17,246</td>
<td>(10,253) (5.16%)</td>
</tr>
<tr>
<td>Feb</td>
<td>7,886</td>
<td>7,510</td>
<td>15,396</td>
<td>(10,253) (5.16%)</td>
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<tr>
<td>Mar</td>
<td>11,213</td>
<td>14,786</td>
<td>26,000</td>
<td>(10,253) (5.16%)</td>
</tr>
<tr>
<td>Apr</td>
<td>15,184</td>
<td>5,274</td>
<td>20,458</td>
<td>10.32%</td>
</tr>
<tr>
<td>May</td>
<td>17,211</td>
<td>6,287</td>
<td>23,498</td>
<td>14.42%</td>
</tr>
<tr>
<td>Jun**</td>
<td>36,185</td>
<td>3,276</td>
<td>39,461</td>
<td>15.15%</td>
</tr>
<tr>
<td>VTD Total</td>
<td>172,248</td>
<td>5,197</td>
<td>177,445</td>
<td>15.15%</td>
</tr>
<tr>
<td>FYTotal</td>
<td>173,248</td>
<td>5,197</td>
<td>178,445</td>
<td>15.15%</td>
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**Please note:** Preliminary membership data - unanticipated and subject to adjustments.

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### San Diego Forward: The 2021 Regional Plan

**Program Environmental Impact Report**

<table>
<thead>
<tr>
<th>Month</th>
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<th>P1D</th>
<th>Total</th>
<th>Variance</th>
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<tr>
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## Table 1. Project Information Request

<table>
<thead>
<tr>
<th>Project</th>
<th>Estimated Total Project Cost</th>
<th>Current Planned Year of Construction</th>
<th>Draft RTP Assessed Year of Construction</th>
<th>Assumed Federal/State Matching Funding (%)</th>
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<tr>
<td>San Diego—Geyser Double Track and Platform</td>
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<tr>
<td>Del Mar—Jackson Double Track and Bridge Replacement</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>El Cajon—Fund Double Track</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Carlsbad Village Tunnels</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>La Costa &amp; Tamar Double Track</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sotl Onsite Bridge Replacement</td>
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<td></td>
<td></td>
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<tr>
<td>Sante Canyon Bridge Replacement</td>
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</table>
# Table 3. Detail of Proposed Rail Lines

<table>
<thead>
<tr>
<th>Rail Mode (SD, LRT, NEX, hybrid)</th>
<th>Description</th>
<th>% of Directional Miles Grade Separated (tunneled)</th>
<th>Number of Stations</th>
<th>Average Openness Between Stations (miles)</th>
<th>Average Length Operated (miles)</th>
<th>Transoperable with COASTER Equipment (Y/N)</th>
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</thead>
<tbody>
<tr>
<td>New Rail Line</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
RESPONSE TO COMMENT 7-23

This comment is not related to the adequacy of the Draft EIR. Project CB32 remains on the list of Regional Arterials projects in the proposed Plan.
Appendix P1. Response to Comments on the Draft EIR

cc: Don Neu, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Eric Landy, Principal Planner
Scott Donnell, Senior Planner
Corey Funk, Associate Planner
1. **RESPONSE TO COMMENT 8-1**

Thank you for the Center for Biological Diversity’s review of the Draft EIR and expressed support for the EIR objectives. The conservation of native species and their habitat is a key component of SANDAG’s Sustainable Communities Strategy. The land use pattern of the proposed Plan envisions greater compact development in areas served by high frequency, efficient transit. The result is less urban sprawl and fewer impacts on native habitat and species. Appendix AA, *Regional Habitat Conservation Vision*, of the proposed Plan describes the region’s efforts to develop and implement a system of open space for conservation of San Diego’s unique biodiversity. Detailed responses to the Center for Biological Diversity’s other comments can be found below.

**RESPONSE TO COMMENT 8-2**

Thank you for your comment and the valuable citations that document the effects of habitat fragmentation on biological resources. The commenter has requested “…SANDAG to add preservation of existing intact habitat and enhancement of wildlife connectivity at existing barriers, as an additional priority [of the Plan].”

The San Diego region has 30-year history of conservation planning for multiple species and their habitats, including the identification of an interconnected wildlife preserve system aimed at promoting connectivity and decrease the negative effects of habitat fragmentation. As documented in Appendix AA of the proposed Plan, SANDAG continues to be committed to funding regional conservation efforts that include wildlife corridors, and states that “the regional habitat conservation efforts have envisioned “hubs” of protected natural lands connected by wildlife movement corridors.” In order to conserve the region’s biodiversity, the EIR describes the proposed Plan’s intent to conserve unfragmented lands and cores and linkages consistent with adopted local NCCP Subarea Plans. The Plan encapsulated this intent within the Connect and Respect objectives of the Regional Vision (see Appendix AA).

To help meet the region’s habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation,
management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8 of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). This funding is estimated to be sufficient to provide all the local funding needed to implement the habitat conservation plans as envisioned. Specific details would start to be developed immediately upon adoption as part of the near-term action items of the proposed Plan (Appendix B of the Plan).

At the project-level, as discussed in Section 4.4 of the EIR, projects that implement the proposed Plan will have to discuss impacts on the project on the conservation plans that include direct loss of habitat and species and indirect impacts such as promoting fragmentation and hindering wildlife movement. Furthermore, projects that bring high speed vehicles in proximity to wildlife life will have to address safety from collisions. This analysis would need to be included, as appropriate, into the subsequent (i.e., second tier) environmental review that will occur at the project level. Measures included in mitigation measure BIO-3 address design considerations to facilitate wildlife movement and connectivity on a project-specific level based on best available studies.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 8-3
Thank you for the Center of Biological Diversity’s participation in the environmental review process. Further elaboration regarding your organization’s comments are addressed in subsequent responses below.

SANDAG appreciates the summary of and citations for edge effects and potential effects of limiting wildlife movement.

RESPONSE TO COMMENT 8-4
SANDAG appreciates the summary and citations for potential effects on wildlife movement.

The Center is encouraged to see that “protecting natural lands to absorb carbon and protect communities from the impacts of climate change” (Plan, Chapter 2, Page 5) is a priority in the Plan. However, we urge SANDAG to add preservation of existing intact habitat and enhancement of wildlife connectivity at existing barriers, as an additional priority.

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal’s behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Ibrekke et al., 2013; Ceír-Lassé et al., 2018; Haddad et al., 2015; Marsh & Laegre, 2015; Mitsch & Wilson, 1996; Trombulak & Frissell, 2000; van der Ree et al., 2011). For example, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al., 2014; Riley et al., 2014; Vickers et al., 2015), increase local extinction risk in amphibians and reptiles (Ibrekke et al., 2018; Cushman, 2006), cause high levels of avoidance behavior and mortality in birds and insects (Bement-López et al., 2010; Kamola et al., 2019; Lew et al., 2014), and alter pollinator behavior and degrade habitats (Aguilar et al., 2008; Govearé et al., 2002; Trombulak & Frissell, 2000). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Dammchen et al., 2019).

Beyond direct impacts, edge effects of development in and adjacent to open space will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks, 2002; Delaney et al., 2019; J. S. Lee et al., 2012; Riley et al., 2006; Smith et al., 2015, 2017; Vickers et al., 2015; Wang et al., 2017), as well as smaller species with poor dispersal abilities, such as songbirds, small mammals, and herpetofauna (Bement-López et al., 2010; Cushman, 2006; Kočovský et al., 2011; Stalekemoor & Rippe, 2008). Limiting movement and dispersal can affect species’ ability to find food, shelter, mates, and refugia after disturbances like fire or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute, 2005).

Furthermore, making roads more perpendicular for wildlife by prioritizing the construction of effective wildlife crossing infrastructure will help improve driver safety and save people money. From 2015 to 2018 more than 25,000 wildlife vehicle collisions with large mammals were reported in California, resulting in human deaths, injuries, and property damages estimated to be worth more than $1 billion (Shilling et al., 2017, 2018, 2019). Alarming, many of these types of collisions go unreported. State Farm estimated more than 92,000 deer collision insurance claims during that same time frame (State Farm Insurance, 2016, 2018). And while car strikes can be immediately fatal for wildlife, many animals that are struck by vehicles may survive the collision but then slowly die from their injuries away from the road (T. S. Lee et al., 2021). Additional deaths from collisions include young that are orphaned and unable to survive.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 8-5

This comment addresses the proposed Plan and is not related to the adequacy of the EIR. The comment asserts that the proposed Plan must enhance and fund wildlife connectivity. Appendix AA of the proposed Plan describes the status of the HCPs within the region and states SANDAG’s commitment to funding regional conservation efforts that include wildlife corridors. For additional elaboration regarding habitat fragmentation and project-specific mitigation, please see response to comment CBD 8-2.

...
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 8-6

SANDAG appreciates the citations provided, including studies conducted by UC Davis Road Ecology Center, and the "roadmap" for mountain lions developed by UC Davis and The Nature Conservancy (Vickers 2020). Although some of the Shilling et al. studies were conducted in Northern California, they still provide valuable information for the design of wildlife crossings to avoid noise and light pollution, and to appropriately mitigate for impacts on wildlife movement. These citations have been included in mitigation measure BIO-3 as references to be consulted when developing project-specific wildlife crossing design.

The EIR uses best available data at the time the analysis was conducted. The Vickers 2020 dataset was not included in the county-wide wildlife movement model analyzed in this EIR because the data were not available yet at the time the model was produced (Jennings pers. comm.). The Vickers (2020) and Shilling (2019) data were used for local modeling (for example modeling conducted for SR 67), but a county-wide model using these datasets has not yet been developed. However, SANDAG has committed to funding regional conservation efforts that include wildlife corridors, and states that “the regional habitat conservation efforts have envisioned “hubs” of protected natural lands connected by wildlife movement corridors” (see Appendix A of the propose Plan). Please see also response to comment CBD 8-2 regarding habitat fragmentation.

SANDAG agrees that the South Coast Mission Linkages Report and CDFW Area of Conservation Emphasis data provide valuable information on wildlife corridors and linkages. EIR preparers reviewed and evaluated these and many more studies providing information on wildlife movement and connectivity in San Diego County on a programmatic level. However, the recent model prepared by SDSU provides more detailed and County-specific data on wildlife movement. The model was specifically prepared with the goal to provide climate change resiliency and adaptation. It incorporates the information from the referenced studies and builds upon them. Therefore, SANDAG did not evaluate the South Coast Wildlands and CDFW studies independently but rather used them in coordination with the SDSU...
model. See also response to comment USFWS 38-12, which discusses the data used in the EIR for MHCP cores and linkages.

The Pacific Flyway is addressed in the EIR. It is described on page 4.4-39. Impacts are discussed on pages 4.4-98 and 4.4-106. Furthermore, the Audubon Society identifies Important Bird Areas (IBA) in San Diego County. All IBAs identified in the Plan footprint are either not developable (i.e., lakes, reservoirs, lagoons, and bays), or are already conserved through various designations (e.g., National Wildlife Refuges, State Preserves, City of San Diego Cornerstone Lands, etc.) and included in the Conserved Lands layers that were part of the GIS dataset analyzed in both Impact BIO-3 and Impact BIO-4 (see also Figure 4.4-16). A reference to the Audubon IBAs has been added to the text.

**RESPONSE TO COMMENT 8-7**

Figure 4.4-15 in the Final EIR has been updated to show the transportation network footprint impacts on wildlife connectivity areas. The model used for identification of wildlife corridors and linkages encompasses the most recent data available for San Diego County, including the Audubon IBAs (by way of the Conserved Lands layer), and therefore reflects a conservative assessment of impacts. In reality, once projects evaluate avoidance measures under project-specific CEQA and include wildlife corridor designs in the project design, the impacts on wildlife movement, corridors, and linkages are expected to be much less than reported in the EIR. A statement explaining the likely overestimation of impacts is included in the Impact BIO-3 direct impact section.

**RESPONSE TO COMMENT 8-8**

SANDAG acknowledges that widening of infrastructure would discourage wildlife movement (see the following statement on Draft EIR pages 4.4-99/100: “they may make existing crossings less attractive for use by wildlife species, and the greater width may lead to additional highway mortality for terrestrial and avian species that attempt to cross transportation corridors at grade.” Measures required under mitigation measure BIO-3 address design considerations to facilitate wildlife movement based on best available studies, including wildlife movement studies. In response to this comment, the following text has been added to measure BIO-3: Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking and consider balancing conservation and recreation (Mitrovich et al. 2020). Include
adaptive management and monitoring measures in the CEQA review, mitigation measures, and project design.

The participation of other project sponsors in the implementation of the EIR and mitigation measures is addressed in Section 4, Environmental Impact Analysis Approach. Specifically, the section identifies the following: “The EIR includes three broad types of mitigation measures: (1) plan- and policy-level mitigation measures assigned to SANDAG; (2) mitigation measures for transportation network improvements and programs, assigned to SANDAG and other transportation project sponsors; and (3) mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions implement.” Mitigation measures would be refined and implementation methods identified, as required by CEQA, the local jurisdictions, and Wildlife Agencies on a project-specific level. In addition, please see Master Response 2.

For more information regarding the use of “can and should” language regarding mitigation measures for other responsible agencies, please see Master Response 2.
SANDAG appreciates your concern regarding the peril of the Santa Ana Mountains and Eastern Peninsula Range mountain lion population.

Since 2012 SANDAG has funded work totaling $989,384 by Winston Vickers and his team at UC Davis Wildlife Health Center to research mountain lions in the San Diego Region. The conclusions of these studies showed: (1) low annual survival rates for mountain lion populations both east and west of I-15, primarily due to interactions with humans – collisions with vehicles and mortalities secondary to depredation permits being the most prominent causes of death, and (2) connectivity between conserved habitat areas is severely compromised, especially between San Diego, Orange, and Riverside (Vickers 2020).

The two major connections into San Diego County are through Orange County into Camp Pendleton and then through San Luis Rey River. The other contention is outside of San Diego County located in Riverside County and connects Camp Pendleton/Fallbrook to lands east of I-15 and Palomar Mountain. The projects in the Plan are outside these identified connections and, therefore, would not further impede existing movements of mountain lion in these two corridors.

This work is being done as part of SANDAG’s commitment to funding regional conservation efforts under its TransNet-funded Environmental Mitigation Program (EMP), which is referenced in the EIR (pg. 4.4-53), together with its implementing entity, the San Diego Monitoring and Management Program (SDMMP). The SDMMP’s charter is “to assist with the alignment of regional efforts to implement activities identified in the Management Strategic Plan” (MSP, SDMMP 2017). The MSP identifies priority species, and has developed and is currently developing, best management practices (BMPs) and protocols for sensitive plants and animals, wildlife movement, fire management, and grazing management (EIR page 4.4-54). The MSP identifies the MSCP-covered mountain lion as a high priority species (SL Category) and has conducted and is currently conducting studies identifying connectivity and genetics of mountain lions in San Diego County. These studies and other best available information will be considered on the project-specific level as identified in mitigation measure BIO-3.

Lastly, please note that Fish and Game Code Sections 2053(a) and 2054 are statements of legislative intent.
Appendix P1. Response to Comments on the Draft EIR

Mitigation ratios cannot be identified on a programmatic basis due to the widely differing circumstances of second-tier transportation and land use projects. The appropriate mitigation ratios will be calculated on a project-specific level based on regulatory agency requirements and will be applied consistent with local requirements and ordinances. Mitigation measure BIO-3 requires incorporation of wildlife connectivity into project design on a project-specific level and identifies ways to do so (see response to comment CDB 8-12). Mitigation measure BIO-1b states that using approved mitigation banks is the preferable alternative to provide compensatory mitigation. Approved mitigation banks, through the approval process with the Wildlife Agencies, are required to monitor, manage and maintain in perpetuity the biological resources for which mitigation credits were approved by the Wildlife Agencies. The Wildlife Agencies monitor the mitigation banks’ commitments on an annual basis by way of annual reports prepared by the mitigation banks’ management entity; all management entities managing mitigation banks must also be approved by the Wildlife Agencies. Furthermore, mitigation measure BIO-1b also identifies “requirement for and financing of long-term conservation and management requirements of the mitigation projects.” Mitigation measures BIO1-c and BIO-1d provide detail on the compensatory mitigation requirements in the form of native habitat restoration planning and design, and the requirement for long-term management and monitoring in perpetuity to assure that all mitigation continues to function over time. Text was added to mitigation measure BIO-1a to require early coordination with the Wildlife Agencies and respective local jurisdictions to design alignments (see also response to comment CDFW 9-8).
Mitigation measure BIO-3 provides programmatic mitigation measures to reduce indirect impacts on wildlife movement corridors. Monitoring and adaptive management was added to the text (see response to comment CBD 8-8). Avoidance, minimization, and mitigation of indirect impacts on wildlife, including mitigation for noise and light impacts, will be addressed at the project-specific CEQA level. These include specific requirements, including prohibiting night-time trail use, use of shielded and dimmed lighting and non-reflective surfaces near wildlife corridors, and installing physical barriers to limit encroachment by humans and noise pollution on wildlife corridors.

In addition, please see response to comment USFWS 38-7, which further describes how the EIR addresses impacts on wildlife movement corridors.
RESPONSE TO COMMENT 8-12

Please see Chapter 4, *Environmental Impact Analysis Approach*, for more discussion regarding SANDAG's approach to proposed mitigation measures. In addition, specific text has been added to mitigation measure B10-3, including the following:

**Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking, identify corridor widths and wildlife crossing structures, and consider balancing conservation and recreation (Mitrovich et al. 2020) in project design. Include adaptive management and monitoring measures in the CEQA review, mitigation measures and project design.**

- Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands or NCCP lands.
- Where feasible, prohibit night-time trail use, enforce seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.
- As feasible, within 200 feet of a wildlife corridor, use non-reflective glass or glass treated with non-reflective coating for all exterior windows and building surfaces.
- Incorporate dimmed, shielded and directed lighting in areas near corridors that only illuminate the project site; consider high pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors.
- Include permanent noise barriers and sound-attenuating features as part of the project design, and incorporate temporary noise barriers and noise-reduction devises on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Install physical barriers (e.g., wildlife fencing) that prevent human and/or domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms,
dense plantings, sound walls, reduced-noise paving materials (i.e., rubberized asphalt), and traffic calming measures.

- Minimize the number of road crossings through identified wildlife corridors.
  - Incorporate the appropriate wildlife crossing infrastructure into project design. Wildlife crossing infrastructure shall be designed following the latest scientific information, and should include upgrading existing culverts to facilitate functional wildlife movement, installing crossing and directional fencing at roadkill hotspots, install wildlife bridges or undercrossing, and manage in perpetuity both sides of the wildlife crossings. Construct or retrofit with features such as open span bridges instead of closed culverts to allow for wildlife movement under linear transportation corridors.
  - If the construction of or retrofitting with wildlife bridges is infeasible, incorporate undercrossings and/or other crossing structures that use scientifically accepted openness ratios to allow for continued movement of wildlife where transportation facilities create barriers to wildlife movement and use of nursery sites. Evaluate size-class-specific crossing structures and movement enhancement features (e.g., habitat refugia within structure, soft bottom undercrossings) for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, create passable aquatic barriers for migratory fish species in order to provide fish access to spawning and rearing habitats.
  - Maintain undercrossings and/or other crossing structures as needed to ensure wildlife movement. Prepare a fencing and wildlife crossing structure maintenance plan for projects with edge effects to maintain permeability for wildlife across corridors.
  - Install directional fencing, where appropriate, to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or other crossing structures. Where fencing stops, extend the fence and angle it away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, use one-way gates or jump-outs so animals that do get around fence end runs can safely exit roadways.
Furthermore, additional language was added to ban anticoagulant rodenticides as follows:

Pursuant to the California Ecosystems Protection Act (AB 1788), ban the use of anticoagulant rodenticides near open space, conserved lands and areas identified as core, linkages, wildlife corridors or other connectivity areas. The use of anticoagulant rodenticides causes secondary poisoning in predators and may contribute to reduced functional connectivity in an already constrained landscape.

The EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time.
RESPONSE TO COMMENT 8-13

SANDAG appreciates the depth of resources provided for consideration and they have been reviewed accordingly. No responses to the attachments specifically have been included because they do not contain comments specific to the EIR and/or proposed Plan. No further response is required.
Appendix P1. Response to Comments on the Draft EIR


https://doi.org/10.1371/journal.pone.0040363


https://doi.org/10.1016/j.biocon.2019.01.008


Appendix P1. Response to Comments on the Draft EIR


RESPONSE TO COMMENT 9-1

Thank you for CDFW’s participation in the environmental review process and the identification of your organization’s role and objectives. Further elaboration regarding your organization’s comments is addressed in the responses below.
CDFW also administers the Natural Community Conservation Planning (NCCP) program. The area encompassed by the Plan is located within planning areas for several NCCP plans within San Diego County (County), including the adopted Multiple Species Conservation Program (MSCP) and Multiple Habitat Conservation Program (MHCP), as well as the draft North County (NC) MSCP and East County (EC) MSCP.

PROJECT DESCRIPTION SUMMARY

Proponent: San Diego Association of Governments (SANDAG)

Objective: The Plan is an update to San Diego Forward: The 2021 Regional Plan adopted in October 2015, and the 2019 Federal Regional Transportation Plan, adopted in October 2019. The DEIR analyzes the significant environmental impacts of the proposed 2021 Plan, which focuses on developing an integrated planning strategy for achieving sustainability in the areas of land use decisions, housing development, and planned transportation for the San Diego region through 2050. The planning strategies also focus on coordinating and managing the region’s transportation networks, services and programs, along with emphasizing the role of public transit in the process.

Regional transportation challenges addressed in the Plan include economic and social inequities, climate change, public health, and safety. The Plan creates an integrated transportation system throughout the 11 Major Travel Corridors of the San Diego region, specifically: South Bay to Coronado; Central Mobility Hub; State Route 125 (SR 125); Interstate 5 (I-5); North Coast Corridor; State Route 84 (SR 84); Interstate 6 (I-6); Coast, Canyons, and Trails; State Route 56 (SR 56); San Vicente; and North County.

The DEIR functions as a Programmatic EIR under CEQA Guidelines Section 15106 for streamlining future projects. The DEIR provides a foundation for second-tier CEQA documents for subsequent projects, but does not analyze the project-specific impacts of individual projects.

The planning horizon of the proposed Plan is 2050. The programmatic and long-term nature of the proposed Plan necessitates a general and at times qualitative approach to the evaluation of impacts. The DEIR analyzes impacts for the two main physical components of the proposed Plan, as well as the combined impacts of these components: regional growth and land use change, and transportation network improvements and programs. SANDAG is required to update the Plan every 4 years, in collaboration with the 16 cities and the County, along with regional, state, and federal partners.

Location: The Plan encompasses the entirety of San Diego County, which is more than 4,200 square miles in area. Most of the urban development lies in the western portion of San Diego County near the coast. Development inland in the eastern portion of the region is less dense and has a more rural character. The boundaries of the Plan include the cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and unincorporated areas within the County. Over half of the total land area in the region is not available for public development, including public lands, dedicated parks and open space, lands constrained for environmental reasons, and military use.

Biological Setting: The DEIR identifies 17 vegetation types in three categories in the San Diego-Region: Wetlands and Riparian (Beach/Coastal Dunes/Saltmarsh, Marsh, Marsh/Estuaries and Seeps, Open Water and Streams, Riparian Forest/Woodland, Riparian Scrub, Vernal Pools), Uplands (Chaparral, Coastal Scrub, Desert Dunes, Desert Scrub, Oak Woodlands).
Appendix P1. Response to Comments on the Draft EIR

Response to Comments on the Draft EIR

San Diego Forward: The 2021 Regional Plan
Program Environmental Impact Report
RESPONSE TO COMMENT 9-2

SANDAG appreciates CDFW’s concerns with respect to climate change and its effects on the region’s biodiversity. SANDAG has included a climate Adaptation and Resilience Program in the proposed Plan. In addition, please see Appendix C of the EIR, Climate Change Projections, Impacts, and Adaptation, which provides the framework for the exacerbation of climate change effects analyzed in the environmental impact analysis sections of the EIR’s Chapter 4.

RESPONSE TO COMMENT 9-3

SANDAG appreciates CDFW’s intentions to complement existing work and provide guidance to reduce the potential for conflict between existing and future plans and regulations for species protections.

RESPONSE TO COMMENT 9-4

This comment expresses concern that the Draft EIR does not analyze potential conflicts with draft MSCPs. Under CEQA and the CEQA Guidelines, only conflicts with adopted HCPs are considered potentially significant. See CEQA Guidelines Appendix G question IVe; see also CEQA Guidelines Section 15125(d)(e) and Chaparral Greens v. City of Chula Vista (1996) 50 Cal.App.4th 1134.

Regarding concern about continuing and funding the development of NCCP/HCP planning efforts, the transportation network and the land use pattern proposed in the SCS does not impact the ability of the local jurisdictions to seek a regional funding source, and, therefore, there is no impact under CEQA and no required mitigation. However, the final Plan has included a commitment to fund habitat conservation, management, and monitoring of the HCPs and regional preserve system under a new funding allocation that when combined with the nature-based climate solutions program and habitat mitigation for transportation projects would total $3 billion, as described in Appendix A of the proposed Plan. Furthermore, SANDAG has committed to monitor the implementation of the SCS on a two-year cycle pursuant to AB 1730 (Gonzalez 2019).

Please refer to Master Response 1 for additional discussion regarding including a regional habitat conservation fund.
RESPONSE TO COMMENT 9-5

This comment recommends that the Draft EIR analyze the impact of the proposed Plan on the unadopted, draft versions of the North County and East County MSCP plans. Please see response to comment CDFW 9-4 above and USFWS 38-4.

RESPONSE TO COMMENT 9-6

In response to this comment, the MHCP core and linkage areas (BCLA) have been added to Figure 4.4-15. The MHCP core and linkages mapping includes the gnatcatcher stepping stones, based on an analysis specifically conducted for the City of Oceanside to inform the preserve design for the MHCP (Bailey and Mock 1998). Under the discussion of the MHCP, the gnatcatcher stepping stones are discussed; text has been added to clarify that the stepping stone concept was included in the MHCP core and linkage map.

The comment asserts that the linkage along I-15 through North County is not referenced in the text. Mention of the I-15 linkage (Santa Ana – Palomar) is included in the text on pages 4.4-103 and 4.4-115. The I-15 linkage is also included on Figure 4.4-16 as part of the model prepared by Jennings (2020). No GIS data currently exist on the Jacumba-Sierra Juarez linkage to Mexico, but the Jennings (2020) model that is analyzed in the EIR includes the US-side of the linkage. With respect to the Santa Ana–Palomar and Jacumba-Sierra Juarez linkage, please see response to comment USFWS 38-12.
**Appendix P.1. Response to Comments on the Draft EIR**

**RESPONSE TO COMMENT 9-7**

The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the plan include site-specific transportation network improvements and development projects. Specific projects under the proposed Plan, including the potential LOSSAN double-tracking alignments and the Del Mar Tunnel would be subject to project-specific environmental review, and the alignment, alternatives, and biological resources analysis will be included in the project-specific environmental review.

**RESPONSE TO COMMENT 9-8**

SANDAG appreciates your input and suggestion. Early coordination with the Wildlife Agencies and the City of San Diego to design alignments that avoid sensitive resources and preserved lands would occur on the project-specific level once a project has been further designed. In response to this comment, the following revision was made to mitigation measure BIO-1a, first bullet point:

- Conduct early coordination with the Wildlife Agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands.

**RESPONSE TO COMMENT 9-9**

This comment suggests that SANDAG coordinate with the Wildlife Agencies and cities of Oceanside and Vista to minimize impacts on riparian corridors from the addition of a second rail to the SPRINTER tracks. Language has been added to measure Bio-1a as included under Comment CDFW 9-8.

**RESPONSE TO COMMENT 9-10**

Reporting of special-status species to the CNDDB would occur for each specific project on a project-specific analysis level. In response to this comment, the following revision was made to mitigation measure BIO-1a, last bullet point:

- Require biological monitoring and regular inspections for construction in the vicinity of and adjacent to sensitive habitats to avoid impacts on these habitats. Report any special-status species and natural communities detected during project surveys to the CNDDB.

Thank you for your comment, SANDAG appreciates your input.
FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Rags, tit. 14, § 753.5; Fish & G. Code, § 7114; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist SANDAG in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Meredith Osborne, Environmental Scientist, at Meredith.Osborne@wildlife.ca.gov.

Sincerely,

David Mayer
Environmental Program Manager
South Coast Region

cc:
David Mayer, San Diego – David.Mayer@wildlife.ca.gov
Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov
Meredith Osborne, San Diego – Meredith.Osborne@wildlife.ca.gov
Cindy Holley, San Diego – Cindy.Holley@wildlife.ca.gov
State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opcr.ca.gov
Susan Wynn, USFWS – Susan.Wynn@fws.gov

Attachments

A. CDFW Comments and Recommendations
### RESPONSE TO COMMENT 9-11
Please see response to comment CDFW 9-4.

### RESPONSE TO COMMENT 9-12
Please see response to comment CDFW 9-6.

### RESPONSE TO COMMENT 9-13
Please see response to comment CDFW 9-7.

### RESPONSE TO COMMENT 9-14
Please see response to comment CDFW 9-8.

### RESPONSE TO COMMENT 9-15
Please see response to comment CDFW 9-8.

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<tr>
<th>Mitigation Measure #1</th>
<th>Timing</th>
<th>Responsible Party</th>
</tr>
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<td>The DEIR should analyze the effects of the proposed Regional Plan on the draft NC and EC MSCP's, Preserve assembly, and full implementation of the plans. Any effect (direct or indirect) of the Plan on these draft NCCPs should be evaluated (and mitigated, if necessary). SANDAG staff should coordinate with County staff and the Wildlife Agencies to best determine how to evaluate the NC MSCP and the EC MSCP in the Plan and DEIR.</td>
<td>Prior to release of the final EIR</td>
<td>SANDAG</td>
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<th>Recommendation #1</th>
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<td>The Regional Wildlife Movement Corridor Map (Figure 4.4-15, page 361 of the DEIR) as well as corresponding text on page 382 should be expanded to include all omitted linkages, including MSCP connectivity, I-15 linkage through North County, and North/South connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep.</td>
<td>Prior to release of the final EIR</td>
<td>SANDAG</td>
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<th>Timing</th>
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<tr>
<td>CDFW recommends SANDAG to include proposed realignments of the LOSSAN corridor away from the coast and Los Penasquitos Lagoon in the DEIR and maps and clarify which alignment is included in the quantification of impacts.</td>
<td>Prior to release of the final EIR</td>
<td>SANDAG</td>
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<td>CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies and the City of San Diego to design alignments within the City of San Diego that avoid sensitive resources and preserved lands.</td>
<td>Prior to construction</td>
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<th>Recommendation #4</th>
<th>Timing</th>
<th>Responsible Party</th>
</tr>
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<tbody>
<tr>
<td>CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies and the cities of Oceanside and Vista to minimize impacts from addition of a second rail to existing SPRINT rail to sensitive resources as feasible.</td>
<td>Prior to construction</td>
<td>SANDAG</td>
</tr>
</tbody>
</table>
RESPONSE TO COMMENT 10-1

Thank you for your comments and consideration of the proposed Plan.

RESPONSE TO COMMENT 10-2

Consistency of the proposed Plan with relevant Local Coastal Programs was analyzed in Section 4.11, Land Use, of the Draft EIR. In addition, sea level rise, including exacerbation of climate change effects, and potential impacts on coastal resources are also addressed throughout the document, including in Section 4.1, Aesthetics and Visual Resources; Section 4.4, Biological Resources, Section 4.7, Geology and Soils, Section 4.10, Hydrology and Water Quality, as well as Section 4.11. For more information related to sea level rise, please see responses to comments CCC 10-3 and 10-4, below.

RESPONSE TO COMMENT 10-3

It is SANDAG's understanding that the H++ sea level rise scenario is generally used for projects with a lifespan beyond 2050 that have high consequences if damaged (for example, major airports or hazardous waste sites) and little to no adaptive capacity. The EIR did not include the H++ scenario in the climate change appendix due to its unknown probability and the fact that it is more relevant in the second half of the century. Because the EIR time horizon only goes out to 2050, SANDAG did not think the H++ scenario was appropriate to include.

The effects of sea level rise on each individual environmental topic studied in the EIR is included in Sections 4.1 through 4.19 as well as in Appendix C of the EIR. In addition, Table C-2 in Appendix C of the EIR identifies all of the EIR resource topic sections that incorporate the effects of climate change–caused sea level rise. Appendix C also provides a description of scientific studies related to sea level rise in California and the San Diego region, including the California Coastal Commission’s Sea Level Rise Policy Guidance and 2017 Draft Residential Adaptation Policy Guidance documents. As acknowledged in the EIR, particularly in Section 4.10, Hydrology and Water Quality, project footprints that lie in low elevations directly adjacent to the coast and within 100-year flood hazard areas would be susceptible to flooding and the effects of sea level rise. Tables 4.10-10 through 4.10-12 in the EIR show transportation network improvements in the 100-year floodplain. Design practices employed in accordance with the local HMP; Caltrans standards; and other related regulations and programs, including FHWA, FTA, and Caltrans policies on adapting to climate change, sea-level rise, and flooding, would be required. Compliance with applicable regulatory requirements and implementation of design measures, safety ordinances, and water quality requirements described above and in Section 4.10.2 would ensure that regional growth and land use changes as well as transportation network improvements would minimize impacts related to flooding. In addition, proposed improvements within coastal zones will undergo separate CEQA analysis, at which time, additional potential adaptation measures may be developed in conjunction with applicable resource agencies, including the California Coastal Commission.

Furthermore, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan, including infrastructure investments within the coastal zone, would be subject to project-specific environmental review. During project-specific environmental review, alternatives to specific infrastructure projects would be identified to minimize the significant impacts of the project, including any potential need for shoreline...
Appendix P. Response to Comments on the Draft EIR

armoring, alternative adaptation strategies to protect the project from coastal hazards, and/or alternate locations.

RESPONSE TO COMMENT 10-5

SANDAG acknowledges the Coastal Commission's support for Project Alternative 3 and the free public transit policy. The proposed Plan provides a framework for meeting its stated goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies, and programs will confirm SANDAG’s commitment to fully realizing the strategies in the proposed Plan. As described in Chapter 2.0, Project Description, of the EIR, as an implementation action SANDAG will evaluate the transition to free public transit and develop a Value Pricing and Fee Implementation Strategy. As part of the implementation process, SANDAG will be conducting ongoing analyses to assess mobility and transit improvements, including those related to improving access for disadvantaged communities. For example, SANDAG is currently working with the Social Equity Working Group to develop near-term solutions to address transit service improvements, amenities, and subsidized transit fares. Appendix U, Cost Estimation Methodology, Table U.2, in the proposed Plan, captures the transit fare subsidies to riders throughout FY2026–FY2050. For more information on the Value Pricing and User Fee Implementation and the Regional Fare Impact Study, please see Appendices B and U of the proposed Plan.

RESPONSE TO COMMENT 10-6

It is noted that the comments provided are preliminary and that they do not represent the opinion of the Coastal Commission itself but rather Coastal Commission staff. Thank you for your comments and consideration of the proposed Plan.
related projects. Additionally, the comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself. Thank you for the opportunity to comment on the DEIR.

Sincerely,

Trevor Hill
Transportation Program Analyst

Cc:
Tami Grove, Statewide Development and Transportation Program Manager, CCC
Shannon Fiala, Southern California Transportation Program Manager, CCC
Kari Schwing, District Director, San Diego Coast District, CCC
Diana Lilly, District Manager, San Diego Coast District, CCC
Deborah Lee, District Manager, San Diego Coast District, CCC
Kanani Leslie, Coastal Program Manager, San Diego Coast District, CCC
RESPONSE TO COMMENT 11-1

Not all Mobility Hub areas are created equal. Coastal Mobility Hubs are envisioned to rely upon some transit services supported by an array of on-demand Flexible Fleets to help people complete short trips in and around the hub without needing to rely on a car. The suite of Flexible Fleets and supporting Mobility Hub amenities as included in the Final EIR can be tailored to meet the needs of people traveling to and within Coronado. SANDAG staff will continue to coordinate with Coronado on planning for appropriate Mobility Hub services, amenities, and supporting technology for this community.

Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11, Land Use, of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions' general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

Government Code Section 65080(b)(2)(B) provides that an SCS “use most recent planning assumptions considering local general plans and other factors.” It also requires that the SCS “set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board.” The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan. As the comment notes, the SCS land use pattern focuses growth and development in the Mobility Hub areas.

Coronado is a major destination due to the presence of one of the region’s top military bases. Additionally, people commuting to hospitality, retail, and dining jobs is a daily occurrence, and the community serves as one of the region’s top tourism destinations for visitors from both outside and within San Diego County. These trip-
inducing factors contribute to the area’s high propensity for regional Mobility Hub designation.

The 6th Cycle RHNA Plan, adopted by the Board of Directors and approved by the California Department of Housing and Community Development, includes a methodology that allocates housing throughout the region near jobs and transit. Consistent with State law, the RHNA process occurs about every 8 years. During the next RHNA process, the Board of Directors will again consider a methodology for allocating housing throughout the region, which may be different from the 6th Cycle methodology. The SCS land use pattern assumes mixed-use development to accommodate future growth and development in the Mobility Hub areas. While this is a strategy to increase housing affordability and reduce VMT, land use authority is reserved for local jurisdictions, and implementation of the land use pattern is to be refined through coordinated planning with the jurisdiction(s).

With respect to Figures 2-35 and 2-14, each shows generalized Mobility Hub boundaries for planning purposes and is not intended to be binding or precise. Mobility hub boundaries are subject to refinement in close coordination/planning with the affected jurisdiction(s). While Naval Air Station North Island is not located within the Mobility Hub area identified in Figures 2-35 and 2-14, it is a major regional employer. As described above, this is one of many trip-inducing factors contributing to the area’s high propensity for regional Mobility Hub designation.
RESPONSE TO COMMENT 11-2

The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). As a programmatic document encompassing the entire region, the proposed Plan and its EIR do not analyze project-specific impacts on City sewer services, recreation facilities, and parks. These would be analyzed at the development project level. This comment also inaccurately suggests that future growth necessitates roadway expansion to increase capacity. SB 743 directed OPR to identify appropriate criteria for the evaluation of transportation impacts in CEQA Guidelines amendments, and provided that once these amendments are adopted, automobile delay, as measured by “level of service” and other similar metrics, no longer constitutes a significant environmental effect under CEQA. OPR selected VMT as the preferred transportation impact metric and applied its discretion to require its use statewide for land use projects and to recommend its use for transportation projects. Transportation impacts for future development projects would be evaluated at the project level consistent with SB 743 and the CEQA Guidelines.

In the proposed Plan, Transit Leap includes a new Rapid bus service from Coronado to Downtown San Diego (Rapid 910) via the San Diego-Coronado Bay Bridge and San Diego-Coronado-Military ferry service that will provide alternatives to driving alone.

RESPONSE TO COMMENT 11-3

Coronado and Imperial Beach are not within the SDCWA service area. They are served by California American Water. However, as is detailed in California American Water’s Typical Water Quality Summary (https://www.amwater.com/caaw/water-quality/water-quality-reports/coronado), “The Coronado water system is served entirely by treated surface water purchased from the City of San Diego. The City of San Diego obtains its raw surface water supplies from local reservoirs and the San Diego County Water Authority. The San Diego County Water Authority obtains its supply from the Metropolitan Water District of Southern California (MWD) and transfers from other water agencies.” The regional water supply discussed in the EIR includes all water obtained from MWD or other sources and imported into the County by the SDCWA. It also includes any surface water captured in reservoirs owned by the City of San Diego. The water supplies purchased by the cities of Coronado and Imperial Beach, therefore, are included in the...
Appendix P1. Response to Comments on the Draft EIR

regional supplies discussed in the EIR. The conclusions regarding the adequacy of regional supplies would apply to the water supplies of these two cities. Wording in the EIR has been changed to clarify that, while the two cities are not within the SDCWA service area, their water supply, obtained via the City of San Diego, is part of the regional supply included in the analysis.

RESPONSE TO COMMENT 11-4

This comment notes that the City Council authorized the release of a public draft CAP on September 7, 2021, and requests that this information be included in Table 4.8-5 of the Draft EIR (page 4.8-18). The Draft EIR was published for public review on August 27, 2021, before the City’s public draft CAP was authorized for release. In response to this request, SANDAG has revised Table 4.8-5 in the Final EIR to include a footnote explaining that the City has published a public draft CAP and does not have an adopted CAP.

Table 4.8-5

Summary of Local Plans to Reduce GHG Emissions (as of November/June 2021)

| Jurisdiction   | Document Title                                                                 | Adopted (year) | New Plan or Update In Progress? | CEQA Qualified Plan?
<table>
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<td>2020</td>
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<td>Chula Vista</td>
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<td>Del Mar</td>
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<td>El Cajon</td>
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<td>2020</td>
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<td>Encinitas</td>
<td>Climate Action Plan</td>
<td>2020</td>
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<td>Escondido</td>
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<td>2021</td>
<td>No</td>
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<td>Imperial Beach</td>
<td>Resilient Imperial Beach: Climate Action Plan</td>
<td>2019</td>
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<td>La Mesa</td>
<td>Climate Action Plan</td>
<td>2018</td>
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<td>Lemon Grove</td>
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<td>Vista</td>
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<td>Yes&lt;sup&gt;3&lt;/sup&gt;</td>
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Sources: City of Carlsbad 2020, City of Chula Vista 2017, City of Coronado 2021, City of Del Mar 2016, City of El Cajon 2020, City of Encinitas 2020, City of Escondido 2021, City of Imperial Beach 2019, City of La Mesa 2018, City of Lemon Grove 2020, National City 2011, City of Oceanside 2019, City of Poway 2009, City of San Diego 2015, Port of San Diego 2013, San Diego County Regional Airport Authority 2020, City of San Marcos 2020, City of Santee 2019, City of Solana Beach 2017, and City of Vista 2021.

1 CEQA Qualified Plan = a plan for the reduction of GHG emissions that includes the elements listed in CEQA Guidelines Section 15183.5(b)(1) (as determined by the agency adopting the plan).
2 The City of Coronado authorized the release of a public draft Climate Action Plan (CAP) on September 7, 2021.
3 The City of Vista published a public draft of a CAP update in 2021 that has not been adopted as of August 6, 2021.

**RESPONSE TO COMMENT 11-5**

For a more detailed response related to this comment, please refer to response L83 in Appendix P.2.
RESPONSE TO COMMENT 11-6

The 2016 land use map was used by SANDAG as detailed in Appendix F of the proposed Plan, and considered local general plans. For consistency purposes with the rest of the County, no change has been made. However, it should be noted that ultimate land use authority is reserved for local jurisdictions, including the City of Coronado. The cities and the county are best positioned to effectively implement the objectives outlined in the proposed Plan as those jurisdictions understand the unique needs of their communities and geographies. As such, it is within the City of Coronado’s authority to determine whether zoning in this area is single-family or multi-family.

RESPONSE TO COMMENT 11-7

This comment addresses the proposed Plan and does not relate to the adequacy of the Draft EIR.

Coronado is a major destination due to the presence of one of the region’s top military bases. Additionally, people commuting to hospitality, retail, and dining jobs is a daily occurrence, and the community serves as one of the region’s top tourism destinations for visitors from both outside and within San Diego County. These trip-inducing factors contribute to the area’s high propensity for regional Mobility Hub designation.

Not all Mobility Hub areas are created equal. Coastal Mobility Hubs are envisioned to rely upon some transit services supported by an array of on-demand Flexible Fleets to help people complete short trips in and around the hub without needing to rely on a car. The suite of Flexible Fleets and supporting Mobility Hub amenities as included in the proposed Final EIR can be tailored to meet the needs of people traveling to and within Coronado. SANDAG staff will continue to coordinate with Coronado on planning for appropriate Mobility Hub services, amenities, and supporting technology for this community. Mobility hub boundaries are also subject to refinement in close coordination/planning with the affected jurisdiction(s).
COMMENT LETTER 12: COUNTY OF SAN DIEGO

RESPONSE TO COMMENT 12-1
SANDAG appreciates the County of San Diego's feedback on the proposed Plan and your participation in the environmental review process. Please refer to subsequent responses to your comments below for detailed responses. Refinements have been made to the Final EIR as applicable.

Responses to comments on the County's comments on the proposed Plan can be found under ID 968 in Appendix P.2. Please note that comments 12-1 through 12-7 apply to the proposed Plan, not to the adequacy of the Draft EIR.

RESPONSE TO COMMENT 12-2
While certain types of Flexible Fleets are envisioned to converge in more dense communities (e.g., micromobility, last-mile delivery), there are also planned Flexible Fleet services that operate outside of Mobility Hubs including in unincorporated communities. These services may include on-demand rideshare, ridehail, carshare, and microtransit services. As an implementation action of the proposed Plan, SANDAG is conducting a Flexible Fleets Implementation Strategic Plan to determine the appropriate use cases and geographic locations that are best appropriate for Flexible Fleet services, including in unincorporated communities of the County. In addition, the proposed Plan includes investments in broadband connectivity that will facilitate improved access to online services and on-demand mobility services.
RESPONSE TO COMMENT 12-3

The proposed Plan includes improvements for arterial roadways so that they can benefit from management approaches and technology enhancements to increase efficiency and reduce delays (see proposed Plan Appendix A, A-41, Table A.13).

While these regional Mobility Hub coverage areas have been used to model the impact Transit Leap and Flexible Fleet trips to/from these hubs have on reducing VMT, they do not restrict Flexible Fleets from serving neighborhoods that may be between or beyond hubs. Some Flexible Fleet services operating within regional hubs will also need to reach outlying destinations, such as the set of beach and shopping communities cited in this comment. There will be many opportunities for Flexible Fleets to connect to Transit Leap stops located along routes between hubs. The same applies to improvements on Complete Corridor arterials connecting to and from hubs.

Appendix Q of the proposed Plan describes emergency evacuation strategies, including signaling, traffic control guides, roadblocks and barricades, electronic signage, land expansion, contra-flow lanes, traveler information services, use of mass transit, and airport uses.

SANDAG also encourages the County to work with staff on any proposals to include additional RAS routes during the next Regional Plan cycle. Eligibility criteria is outlined in Appendix T of the proposed Plan.

RESPONSE TO COMMENT 12-4

The proposed Plan aims to improve access to a quality public transportation system for all San Diego residents, especially for seniors, historically underserved communities, and other under-represented populations. SANDAG’s social equity analysis projects significant improvements for senior access to high-quality transit service, parks, and recreational facilities. In every metric senior access to transit, retail, medical facilities, and parks improves through 2025 and 2050. More data and analysis is available in Appendix H of the proposed Plan.

In general, the Draft EIR found that the main drivers of demand for recreational facilities is population growth, not transportation network improvements (see, inter alia, EIR page 4.15-40). However, “[t]he transportation network improvements and programs, in particular rail improvements and active transportation facilities, could redistribute a portion of existing travel and attract transit users to recreation facilities...”
in the vicinity of transit stops and stations leading to minor increases in usage....In addition, active transportation improvements would expand recreation opportunities, such as bicycle facilities” (EIR page 4.15-43).

**RESPONSE TO COMMENT 12-5**

The proposed Plan suggests a Nature-Based Climate Solutions Program that will promote natural infrastructure that uses or mimics natural processes to benefit people and wildlife. SANDAG will prioritize resilience and innovative solutions in transportation infrastructure, Comprehensive Multimodal Corridor Plans (CMCPs), and consistent regional planning and implementation of the Sustainable Communities Strategy actions, emphasizing both nature-based and technological climate solutions. There are also further opportunities to expand upon ongoing efforts to assess the amount of carbon storage and sequestration potential of open space lands and the co-benefits from preserved open space, land management, and restoration activities.

The development CMCPs by SANDAG and Caltrans will consider all relevant and related plans and projects, in collaboration with city and County staff, to ensure there is cohesion and consistency between the CMCP and the communities within and adjacent to them, including active and multi-modal transportation considerations. These are focused efforts to identify projects and strategies that integrate transportation options, wildlife connectivity, and technology deployment to improve mobility and evacuations along the corridors.

This comment asks that the proposed Plan consider mobility needs for wildlife and equestrians in addition to pedestrians, bicyclists, and vehicles. This comment is therefore aimed at the proposed Plan, not the EIR. The EIR analyzes the proposed Plan’s impact on wildlife corridors in Section 4.4, *Biological Resources*. Mitigation measure BIO-3 includes specific measures to facilitate wildlife movements.

**RESPONSE TO COMMENT 12-6**

The intent of the Managed Lanes is to create a flexible system that can be managed in real time. This is similar to how the I-15 corridor is currently managed in North County. Solo drivers will have options to use the lanes but at a price, and transit services can travel congestion free. The result is better optimization of the system that encourages higher occupancy travel but with real alternatives that are competitive with driving.
SANDAG will launch a study in the next year to further examine the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.

**RESPONSE TO COMMENT 12-7**

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The land use pattern proposed in the proposed Plan focuses growth and development in the mobility hub areas. The allocation of housing units to subregional areas represents general areas projected for future growth and not precise locations for future housing development or housing unit type. The exercise of land use authority is reserved for local jurisdictions, and projected intensity and density of development under the proposed Plan would be achieved through a variety of strategies without placing housing areas in incompatible areas defined by an Airport Land Use Compatibility Plan (ALUCP).

**RESPONSE TO COMMENT 12-8**

In response to this comment, text has been added to the Dark Sky Ordinance summary on page 4.1-10 of the EIR to indicate that this ordinance also includes the minimization of light pollution to reduce impacts on wildlife. Mitigation measure BIO-2a in Section 4.4 provides measures to reduce impacts from increased temporary and permanent sources of lighting during construction and operation of future development occurring under the proposed Plan.
RESPONSE TO COMMENT 12-9

The types of trees and vegetation that would be used to replace impacted vegetation would vary, depending on a number of factors; however, in response to this comment mitigation measures AES-2a, AES-2b, and AES-3a have been modified to include language prohibiting planting of invasive plant species, as designated on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory.
RESPONSE TO COMMENT 12-10

The significant reduction in impact acreages is due to a significantly smaller development footprint in non-urban areas and, thus, a significantly smaller impact on biological resources in general.

RESPONSE TO COMMENT 12-11

Thank you for submitting the County of San Diego’s comments on the NOP for this EIR. The EIR preparers received your comments and considered them in the preparation of the EIR. Direct and indirect impacts from the proposed Plan land use change and transportation network on the County’s adopted MSCP are programmatically addressed under Impact BIO-4 of the EIR. Indirect impacts are assessed qualitatively. Tables 4.4-16 through 4.4-19 quantitatively assess impacts on the County’s MSCP Preserve. Consistent with the County’s adopted MSCP, the County would be consulted prior to any design of projects that could potentially have an effect on the County’s MSCP Preserve. Furthermore, consistent with the EIR, any such projects would be required to be consistent with the County’s MSCP, and no impacts on hardline preserve are expected. Should impacts on the MSCP be unavoidable, boundary line adjustments would be required as mitigation for such impacts, pursuant to the County’s guidelines and in consultation with the County of San Diego. In addition, please see response to comment USFWS 38-4.

RESPONSE TO COMMENT 12-12

Figure 4.4-16 has been revised to include any County of San Diego conserved open space parks that were/are not included in the Conserved Lands database in the Final EIR.

RESPONSE TO COMMENT 12-13

The impacts on the Otay Ranch Preserve are a factor of the programmatic nature of the proposed Plan footprint. Specific impact avoidance, minimization, and mitigation measures will be developed during subsequent project-specific CEQA-level review and will require consistency with any adopted HCP. Project-level analysis will include consultation with the County Department of Parks and Recreation.

RESPONSE TO COMMENT 12-14

Please see response to comment County of SD 12-12.
RESPONSE TO COMMENT 12-15
The text has been revised throughout the document and “hardline preserves” has been replaced with “NCCP Preserves” to identify not just MSCP but also MHCP preserve designations.

RESPONSE TO COMMENT 12-16
Table 4.4-6 has been revised to reflect this comment in the Final EIR.

RESPONSE TO COMMENT 12-17
Figure 4.4-16 has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 12-18
The text on page 4.4-109 in Section 4.4 has been revised as suggested. The following language has been added:

The Public Park Preservation Act of 1971 (Public Resources Code Sections 5400-5409) requires that any “take” of public parkland may require compensation that is sufficient to acquire substantially equivalent substitute parkland or provide substitute parkland of comparable characteristics.
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RESPONSE TO COMMENT 12-19
The 2017 reference was an error. The figures and text have been revised to show that the analysis used SanBio's 2020 data in the Final EIR.

RESPONSE TO COMMENT 12-20
Revisions to Table 4.4-5 and the associated text have been made to remove reference to the Quino checkerspot amendment and the RBHCP in the Final EIR.

RESPONSE TO COMMENT 12-21
Thank you for your comment. Figure 4.4-15 has been revised to include the transportation network footprint in the Final EIR. Please also see response to comment CBD 8-7.

RESPONSE TO COMMENT 12-22
The text for mitigation measure BIO-1e has been revised to add the following:

Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (CalIPC) California Invasive Plant Inventory, including the development of an integrated invasive plant control plan describing protocols and enforcement schedules for maintenance, construction, and emergency activities working within and moving between important habitat areas in the Final EIR.

RESPONSE TO COMMENT 12-23
SANDAG notes the County's concern that the EMP or other TransNet funding may not provide a long-term regional funding source for conservation and may leave local jurisdictions responsible for securing ongoing funding to implement local NCCPs. Please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund.

RESPONSE TO COMMENT 12-24
The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan, including those that would impact County parks and preserves would be subject to project-specific
environmental review. As a rough estimate the proposed Plan would impact approximately 59 acres of open space parks and 20 acres of recreational lands.

Also, note that County parks and preserves are in general not CEQA-defined cultural resources, i.e., archeological resources or built-environment resources.
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RESPONSE TO COMMENT 12-25

Under the County of San Diego’s Grading Ordinance it is unlawful for any person to perform any grading or clearing within the County jurisdiction without proper approvals through County officials. While the Grading and Erosion Regulations discussion in Section 4.7, Geology, Soils and Paleontology, does not reference the specific grading and erosion control regulations of any of the local jurisdictions that fall within the region, the EIR discusses local jurisdictional requirements and the need to obtain appropriate permits in order to control erosion and sedimentation caused by construction activities. The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review and will follow applicable laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 12-26

Revisions were incorporated into Table 4.7-3 as suggested by the comment.

RESPONSE TO COMMENT 12-27

Revisions were incorporated into Table 4.7-4 as suggested by the comment.

RESPONSE TO COMMENT 12-28

Additional text was added to page 4.7-52 of the EIR regarding which regulations are applicable to an Onsite Wastewater Treatment System. However, as stated in Section 4.7, “all site designs would be reviewed and approved by the appropriate agencies.” Approval from reviewing agencies will ensure that the proposed project is in compliance with all regulatory requirements, some of which may differ and vary depending on the jurisdiction within which the development will take place. As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review and will follow applicable
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laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 12-29
SANDAG looks forward to collaborating with the County to identify an efficient and cleaner multi-modal transportation system that reduces VMT for unincorporated area residents by providing mobility options, which would reduce GHG emissions and improve air quality for all residents in the region.

RESPONSE TO COMMENT 12-30
Please see response to comment County of SD 12-2.
RESPONSE TO COMMENT 12-31

The coverage area of each regional Mobility Hub is based on a data-informed propensity analysis carried out in parallel with Transit Leap routing assessment. The analysis leveraged Census Block Group geographies, including ones in unincorporated areas, to assess which areas were most conducive to hubs based on factors such as current and forecasted population and jobs, proximity to major destinations, community of concern coverage, and levels of short trip-making.

RESPONSE TO COMMENT 12-32

The proposed Plan includes an SCS, as required by SB 375 (Steinberg, 2008), for the San Diego region. When combined with the transportation network, the SCS exceeds the state’s target for reducing per capita GHG emissions set by CARB. Further clarification on planned improvements to the bus network, including frequency and span-of-service improvements are reflected in Appendix A, Attachment 1 of the proposed Plan. Beyond fixed-route transit service, the proposed Plan envisions unincorporated communities to be served by Flexible Fleet services, offering mobility options that can reduce VMT and GHG emissions through increased carpools, vanpools, ridesharing, and microtransit.

RESPONSE TO COMMENT 12-33

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Government Code Section 65080(b)(2)(B) provides that an SCS must “use most recent planning assumptions considering local general plans and other factors.” It also requires that the SCS “set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board.” The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions’ general plans. The latest projection for the San Diego region reflects a reduction in expected population growth.
compared to prior forecasts. The SCS land use pattern aligns with the RHNA allocation for the County of San Diego, which is 6,700 units in unincorporated areas by 2029. Historic home building data was not a factor considered in development of the forecast. The proposed Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

**RESPONSE TO COMMENT 12-34**
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. SANDAG looks forward to continued collaboration with the County.

**RESPONSE TO COMMENT 12-35**
Figure 4.9-3 has been added per the County’s request in the Final EIR.
RESPONSE TO COMMENT 12-36

In addition to the potential release of hazardous materials during preconstruction, demolition, or construction activities, the analysis under Impact HAZ-1 notes that most land uses are likely to involve activities in which some form of hazardous materials would be routinely used, stored, handled, or transported. Additional operation impacts are discussed under Impacts HAZ-2 through HAZ-4. Furthermore, Impact HAZ-1 would result in a less-than-significant impact, and mitigation measures would not be required. As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review, and any site-specific mitigation measures would be identified during that process.

RESPONSE TO COMMENT 12-37

The analysis under Impact BIO-2 in Section 4.4 discusses the potential water quality impacts that could affect sensitive wildlife species and their associated habitats. The section specifically discusses the impacts on water-dependent species if changes in hydrology occur from the proposed Plan.

RESPONSE TO COMMENT 12-38

Regional trails are discussed in the Recreational Facilities subsection of Section 4.15, Public Services and Utilities. Section 4.15 has been updated to address County-specific trails, including regional trails. The following text was added to page 4.15-43:

In addition, the future transportation network improvements could have impacts on the following County parks and recreation facilities through the year 2050: Eastview County Park and Sweetwater Regional Park (i.e., SR 125 Complete Corridor improvements from SR 905 to SR 54), Lakeside Sports Park (San Diego River Trail from Mast Park to Lakeside baseball park), Los Peñasquitos Canyon Preserve (Commuter Rail), Otay Valley Regional Park (Heritage Road Bridge); San Elijo Lagoon and Ecological Reserve (North Coast Bike Trail), San Luis Rey River Park (San Luis Rey River Trail), and Waterfront Park
(Commuter Rail). None of the County trails would be impacted by transportation network improvements.

No revisions to Section 4.11, Land Use, of the EIR have been made as a result of this comment. SANDAG looks forward to working with the County to identify opportunities for increased trail connections during implementation of the proposed Plan.

**RESPONSE TO COMMENT 12-39**

In response to this comment, SANDAG has added a reference to the Parkland Dedication Ordinance, Community Trails Master Plan, and Parks Master Plan on page 4.15-35 of the Final EIR due to their relevance to addressing population growth impacts on park and recreation resources.

**RESPONSE TO COMMENT 12-40**

Table 2-2 in Chapter 2 of the EIR outlines where population growth would occur throughout all jurisdictions in the County. The sentence under the REC-1 discussion simply summarizes the geographic population trends presented in the table and is not intended to be all-inclusive. As shown in Table 2-2, 1 percent of the forecasted population growth would occur in the unincorporated County lands between 2016 and 2050.

To provide further clarification, the following text has been added to page 4.15-43 of the Final EIR:

In addition, the future transportation network improvements could have impacts on the following County parks and recreation facilities through the year 2050: Eastview County Park and Sweetwater Regional Park (i.e., SR 125 Complete Corridor improvements from SR 905 to SR 54), Lakeside Sports Park (San Diego River Trail from Mast Park to Lakeside baseball park), Los Peñasquitos Canyon Preserve (Commuter Rail), Otay Valley Regional Park (Heritage Road Bridge), San Elijo Lagoon and Ecological Reserve (North Coast Bike Trail), San Luis Rey River Park (San Luis Rey River Trail), and Waterfront Park (Commuter Rail). None of the County trails would be impacted by transportation network improvements.
RESPONSE TO COMMENT 12-41

The requested information regarding population growth in the unincorporated County is provided in Table 2-2, as noted in response to comment County of SD 12-40.

With regard to the loss of open space parks in the 2035 scenario, the impact analysis applies the recreation significance threshold and concludes that population and growth may result in a physical deterioration of park and recreation facilities. Deterioration caused by overuse can lead to a number of physical environmental impacts including degradation of the quality of biological habitats or increases in erosion near trailheads or along trails, as described in Sections 4.4 of the EIR. Minor edits have been made under the 2025, 2035, and 2050 scenarios to clarify the link between population growth and impacts on recreation facilities. Page 4.15-42 of the EIR acknowledges that local jurisdictions have the means to acquire, develop, and maintain parkland and recreation facilities in the future through funding mechanisms described in Section 4.15.2. However, there are no assurances that future park and recreation facilities would be capable of adequately serving forecasted populations contained in the proposed Plan. For this reason, the EIR concludes that impacts may be significant, should the Plan be approved.

RESPONSE TO COMMENT 12-42

The County of San Diego park and recreation facilities that could be impacted by proposed transportation network improvements are listed in response to comment County of SD 12-40. Potential impacts on those facilities have been addressed programmatically in the appropriate sections of the EIR and are illustrated in Figure 4.15-2.

RESPONSE TO COMMENT 12-43

SANDAG acknowledges there any many existing and future trails in the region that facilitate pedestrian movements. The trail information specificity requested in this comment is beyond the scope of the EIR; however, as noted in response to comment 12-40, none of the County trails would be impacted by the proposed Plan. A reference to the County’s Community Trails Master Plan has been added to the EIR in response to comment 12-39.
RESPONSE TO COMMENT 12-44

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The following language has been added to Mobility Hub maps (Figures 2-35 and 2-36) in the Final EIR:

> These maps show generalized regional Mobility Hub boundaries for planning purposes and are not intended to be binding or precise. Mobility Hub boundaries are subject to refinement in close coordination with the affected jurisdiction(s).

RESPONSE TO COMMENT 12-45

SANDAG looks forward to coordinating with the County on many areas of implementation for the proposed Plan, including the Flexible Fleet Implementation Strategic Plan, Active Transportation Plan, Comprehensive Multimodal Corridor Plans, and advanced transit planning. All of these efforts provide opportunities for refinement of the proposed Plan concepts at a local level.

RESPONSE TO COMMENT 12-46

SANDAG looks forward to coordinating with County staff prior to developing transportation plans that go through or near County properties and facilities.

RESPONSE TO COMMENT 12-47

The County is currently developing an Active Transportation Plan (ATP) for the unincorporated communities of the county. The ATP will integrate and update several existing plans and documents into a single plan. The ATP will serve as a master plan and policy document to guide the development and maintenance of active transportation infrastructure including sidewalks, pathways, multi-use trails, and bikeways; the ATP will include the Safe Routes to School programs for the unincorporated County. Additionally, the ATP is expected to be one of the implementation measures for the County's Climate Action Plan.
Thank you for your comments. SANDAG looks forward to future coordination with the County of San Diego.
RESPONSE TO COMMENT 12-49

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see Plan responses L165 through L174 in Attachment P.2.
PLANNING FOR THE UNINCORPORATED AREAS

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

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

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

County staff is also interested in understanding how Regional Housing Needs Assessment (RHNA) allocations would be assigned. For the current 8th RHNA cycle, which covers 2021 – 2029, SANDAG allocated 6,700 units for the unincorporated area, with a total housing forecast in the Regional Plan of 7,419 units through 2050 for the unincorporated area. This forecast projects the County’s RHNA allocation of 6,700 units being met by 2025, with an additional growth of 715 units by 2035, and projects no further growth in the unincorporated area through 2050. Based on this forecast, it appears that beyond 2035, all future housing needs in the region from RHNA cycles would be allocated to and met by growth in incorporated cities.

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

COMMUTER PATTERNS AND MOBILITY IN THE UNINCORPORATED AREA

The Regional Plan focuses on five key investment opportunities: Next Operating System (NOS), Complete Corridors, Transit Leaps, Mobility Hubs, and Flexible fleets. Many of the Regional Plan investments would be contained within proposed mobility hubs and along identified complete corridors. The majority of infrastructure improvements appear to support a shift to new rail and trolley line infrastructure, largely along the coastal areas. However, Ramona, Lakeside, Spring Valley, and other unincorporated east and north county communities represent a significant population that would benefit from similar consideration for infrastructure improvements as that proposed for the coastal communities with less population. According to SANDAG’s “Commute Patterns in the San Diego Region” study, a majority of the unincorporated east and north county residents who are employed commute outside the boundaries of their County Supervisorial
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district, with 84% of District 2 residents working outside the district and 82% of District 5 residents working outside the district. Vehicle miles traveled could be reduced through greater mobility options for the unincorporated area (i.e., expansion of mobility hubs, increased transit options such as bus rapid transit, and improvements to transit frequency and service areas).

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

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

**FUNDING AND FINANCING**

County staff appreciates the difficulty in forecasting funding and revenue sources for a regional transportation network. The Regional Plan identifies use of TransNet funds as part of the implementation, but it is unclear whether projects that have previously been planned, programmed, or awarded as part of the previous plan using TransNet would retain that funding allocation, or if there would be a reallocation of these funds as part of the Regional Plan. It is also unclear if there would be any changes to the current allocation or use of funds that local agencies receive directly for local road system improvements. The unincorporated area relies on TransNet funding to build, improve, and maintain transportation facilities that enhance roadway safety and support smart growth development, including road infrastructure to support increased transit options. Loss or reallocation of this funding could affect these projects and limit the County’s ability to provide transportation services in support of our goal of reducing greenhouse gas emissions.

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

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

**RESOURCE DISTRIBUTION**

The Regional Plan provides SANDAG with an opportunity to guide future investments in a way that meets smart growth objectives and reduces GHG emissions, but also guides future allocation of resources to achieve equitable outcomes. Several of the unincorporated communities, such as Lakeside, Spring Valley, and Ramona, have larger populations than some of the incorporated...
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Cities that are prioritized in the Regional Plan. In review of the proposed plan expenditures, a
majority of the capital investments (55% of RTP funding) appear to go toward mobility hubs,
complete corridors, and Next OS investments that are primarily outside of unincorporated
communities. It is unclear what proportion of investment would go toward addressing mobility
challenges within unincorporated communities and infrastructure investment that would provide
linkages between the unincorporated areas and the proposed mobility hubs, transit loop, flexible
fleets, and complete corridors. County staff is committed to working with SANDAG to further
identify opportunities to equitably distribute the mobility benefits of the 5 Big Moves and further
reduce GHG emissions regionwide.

The County appreciates the opportunity to comment on the Draft Regional Plan, and staff looks
forward to future discussions regarding these comments. If you have questions regarding this
letter, please contact Rami Tallefs, Deputy Director with the Department of Planning and
Development Services at 858-485-5473 or Rami.Tallefs@sdcounty.ca.gov.

Sincerely,

Sarah E. Aghassi
Deputy Chief Administrative Officer

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

Attachments
Attachment A: Comments from County Departments and Divisions
Attachment B: Expansion Potential of Mobility Hubs (North County Metro, Lakeside, and Spring
Valley)
RESPONSE TO COMMENT 12-50

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see Plan responses L418 through L437 in Attachment P.2.

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

Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 12-50

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see Plan responses L418 through L437 in Attachment P.2.
ROADS/TRAFFIC/FIELD ENGINEERING

7. Complete Corridors, such as the SR-67 and I-15 Corridors, are envisioned to act as the backbone of the regional transportation system. In addition to providing for safe and comfortable spaces to get around for all modes of transportation, road improvements such as intersection widening are important for the safe and reliable movement of all road users. County staff would like to discuss further identification and investment within complete corridors that provide linkages to the unincorporated area. These improvements could assist in providing routes for the County's eastern and northern rural regions that could be essential in the event of accidents or fire evacuation. For example, County staff would like to discuss with SANDAG the option of including safety improvements along the SR-67 Corridor on WIndsor Canyon Road, as this road is a relief route to SR-67. Additionally, road improvements on Old Hwy 305 and Pala Temescal Road in the north county may merit further conversation, as both of these roads serve as alternate routes to I-15 during peak traffic hours.

8. County staff would like to further discuss improvements of low flow crossings that are necessary to limit area flooding as well as the safe passage of motorists.

9. County staff would like to work with SANDAG to identify evacuation routes at a regional level, and the possibility of creating a separate section within the Regional Plan that would identify improvements of these routes and potential funding that could be part of the 2021 Regional Plan.

10. County staff would like to discuss with SANDAG how Smart Infrastructure and Connected Vehicles will address the legal and financial challenges with sharing traffic signal data with private entities and the liability of the potential misuse of signal timing data.

11. County staff would like to better understand the impact of Electric Vehicle Infrastructure on County of San Diego public right of way.

WATERSHED

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

13. Figure AA-1 shows the conserved habitat lands in the San Diego region (light green) and displays the areas included in the four subregional habitat conservation plans (subfigures).
   a. The Pre-Approved Mitigation Area (PAMA) of the South County Multiple Species Conservation Program (MSCP) and draft PAMA of the draft North County MSCP are labeled as "Proposed Conserved Habitat Lands" (dark green). This label may be misinterpreted by readers. While the MSCP Preserves will be assembled within the PAMA, not all PAMA designated lands will be conserved or are being actively pursued for conservation at this time.
   b. The draft Focused Conservation Area (FCA) of the draft East County MSCP was not included in the "Proposed Conserved Habitat Lands" (dark green). This area is equivalent to the draft North County MSCP's draft PAMA and should be included in this figure.
   c. The Rancho Gueyúc property located north of San Pasqual Valley Road will not be included in future iterations of the draft North County MSCP Permit Area. The portions of this property identified within the draft North County MSCP should be changed from dark green to white to reflect this change.
   d. In the subfigure, both the draft North County MSCP and Multiple Habitat Conservation Plan (MHCP) are identified by the number "4." The MHCP area should be identified by the number "1" to correspond with the provided key.

14. Although the draft 2021 Regional Plan mentions the importance of protecting habitat corridors and wildlife linkages through land acquisition, it does not appear to include the construction of safe passageways to connect wildlife to preserved lands bisected by existing and future regional transit corridors. It is recommended that SANDAG work with the San Diego Monitoring and Management Program (SDMMP) and community partners to identify the areas along regional transit corridors that would benefit from wildlife crossings and that these improvements be included in future regional projects.

PARKS AND RECREATION

15. For proposed projects that occur adjacent to Department of Parks and Recreation (DPR) County-managed lands, DPR staff would like to coordinate with SANDAG staff to ensure wildlife connectivity is maintained from adjacent lands to preserved County lands, including wildlife-only crossings.

16. For proposed projects that occur adjacent to or near existing or potential future trail connections, DPR staff would like to coordinate with SANDAG staff on trail connectivity throughout the County and incorporate safe multi-use crossings such as bridges or overpasses for recreational use.

17. DPR staff request SANDAG staff coordinate in developing SANDAG's 5 Comprehensive Multimodal Corridor Plans as mentioned in Appendix B: Implementation near DPR facilities:
   a. Central Mobility Hub and Connections, Coaster, Cynorns, and Trails - State Route 52, North County – SPRINTER/Palomar Airport Road/State Route 75/State Route 76, San Vicente – State Route 87, South Bay to Sorrento – Purple Line/Interstate 805/Blue Line/Interstate 5 South.
Appendix P1. Response to Comments on the Draft EIR

1. As the owner and operator for eight airports in the region, County Airports continues efforts to safely operate its facilities, ensure future land uses are compatible with aircraft operations, and protect the health and safety of people and property within the vicinity of an airport. The County’s airports serve as transportation hubs, emergency service facilities and economic engines in their communities. McClellan-Palomar Airport is the only commercial airport in North County and has over 150,000 annual aircraft operations. It is also a Customs and Border Protection Port of Entry. In East County, Gillespie Field is the 45th busiest airport in the nation with 245,000 annual operations. Both of these airports support thousands of jobs and generate hundreds of millions of dollars in economic activity. The County looks forward to the integration of these airports into the regional transportation system.

20. The San Diego County Regional Airport Authority adopted Airport Land Use Compatibility Plans for the eight airports, which included land use compatibility policies related to airspace, noise, safety and overflight. Those policies have been adopted by the County of San Diego through its General Plan and Zoning Code. After evaluating the forecasted increases in housing and jobs around the Mobility Hubs, there are several land use assumptions related to safety and noise around Fallbrook Airport, Jacumba Airport, Gillespie Field and McClellan-Palomar Airport that County staff would like to better understand. For example, there are forecasted incompatible housing increases within the Runway Protection Zones at Gillespie Field. These inconsistencies could result in the assumed intensities and densities increases being unachievable.
RESPONSE TO COMMENT 12-51

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see Plan response L438 in Attachment P.2.

ATTACHMENT B
2021 REGIONAL PLAN PROPOSED MOBILITY HUB EXPANSION AREAS

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

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

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

Spring Valley is located east of the proposed Lemon Grove mobility hub and south of the proposed La Mesa mobility hub. This community has existing transit access along Jamacha Boulevard and is in close proximity to the MTS Trolley stations in Lemon Grove. Expansion of this mobility hub could include the Spring Valley areas near SR-125 and along Jamacha Boulevard.
RESPONSE TO COMMENT 12-52
This comment was submitted during the NOP scoping period for the EIR and is not a comment on the adequacy of the EIR. No additional response is required.

RESPONSE TO COMMENT 12-53
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.
RESPONSE TO COMMENT 12-54

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. SANDAG has incorporated the Regional Aviation Plan (RASP) and Airport Multimodal Accessibility Plan (AMAP), and these can be found in Appendix BB of the proposed Plan. SANDAG will assess the ground transportation network throughout the region and prioritize transportation projects from the RASP and AMAP where appropriate and most needed.

RESPONSE TO COMMENT 12-55

This comment consists of County comments on the NOP, which appear to be similar to comments included in the County’s letter on the Draft EIR, and which have been responded to in prior responses. Also note that the comment does not raise any issues about the adequacy of the Draft EIR and no response is required. However, the following clarifications are provided:

(a) The proposed Plan includes a transportation system that includes multi-modal options for the unincorporated county, such as investments in transit service, flexible fleets, active transportation, and electric vehicle programs.

(b) The Urban Area Transit Strategy was not updated for the proposed Plan. The proposed Plan identifies 31 Mobility Hub areas as focus areas for facilitating access to transit, deploying flexible fleet services, implementing complete streets, and focusing future growth and development. Chapter 2 of the proposed Plan also acknowledges the importance of transit priority areas as areas of focus for future planning efforts between SANDAG and local jurisdictions in support of sustainable communities. As shown in Figure 2.6 of the proposed Plan, there are unincorporated communities contained in Mobility Hub areas and/or transit priority areas.

(c) Performance results of the proposed Plan (see Appendix T of the Plan) demonstrate a reduction in per capita vehicle miles traveled and per capita GHG emissions. The Social Equity Analysis of the proposed Plan (see Appendix H of the Plan) demonstrates an increase in access to alternative modes of transportation to low income, minority, and senior populations.

(d) The comment asks SANDAG to clarify whether GHG emissions reductions under the proposed Plan would be consistent with the “Air Resources Board (ARB) 2030 Target Scoping Plan.” SANDAG assumes
Appendix P1. Response to Comments on the Draft EIR

this is a reference to California’s 2017 Climate Change Scoping Plan (2017 Scoping Plan), which identifies measures for how California can achieve the GHG reduction target of SB 32, which set forth in State law a requirement that statewide GHG emissions levels be reduced to 40 percent below 1990 levels by 2030.

The Draft EIR analyzes whether the proposed Plan would be inconsistent with the State’s ability to achieve the 2030 reduction target of SB 32 in Impact GHG-5 (Draft EIR pages 4.8-31 to 4.8-33). The proposed Plan would assist in meeting the statewide 2030 GHG target by reducing GHG emissions in the passenger vehicle sector through the implementation of transportation network improvements and programs and efficient land use patterns to ultimately reduce VMT and the combustion of gasoline and diesel fuels pursuant to SB 375.

Nevertheless, the Draft EIR concludes in Impact GHG-5 that the proposed Plan’s 2030 GHG emissions would be inconsistent with the State’s ability to achieve the goals of SB 32 because total emissions in the San Diego region of 20.4 MMTCO₂e in 2030 would exceed the regional 2030 GHG reference point of 15.6 MMTCO₂e (which is based on SB 32 targets for 2030). The 2017 Scoping Plan indicates that to achieve the statewide 2030 target, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California’s natural and working lands, and sustainable solid waste management are among many actions the State must take. Many of the needed actions, including generation of renewable electric power, decarbonizing buildings, vehicle mandates, and sustainable solid waste management, are outside the jurisdictional authority of SANDAG and the scope of the proposed Plan. CARB notes that to reach the State’s long-term GHG reduction goals, local, regional, and State agencies must engage with each other and local stakeholders to coordinate climate change solutions and programs to reduce local GHG emissions.

The Draft EIR identifies Impact GHG-5 as a significant impact in the year 2030. The Draft EIR identifies several mitigation measures to reduce this significant impact by achieving additional GHG emissions reductions above and beyond the reductions shown in the analysis for GHG-5 (mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, and GHG-5f). However, even with additional GHG emissions reductions from these mitigation measures, total regional GHG emissions would remain inconsistent with the State’s ability to achieve the 2030 target. Achieving the necessary
level of reductions from all GHG emissions sectors will require a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. The Draft EIR concludes that Impact GHG-5 would be significant and unavoidable.

(e) In 2016–2018, local jurisdictions, including the County of San Diego, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development.
RESPONSE TO COMMENT 12-56
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see response to comment County of SD 12-11.

RESPONSE TO COMMENT 12-57
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. At the regional and local level, SANDAG is supportive of planning efforts for locally sponsored trails and pathway networks as alternative transportation options and that foster improved neighborhoods and community connections. Please see discussions provided in Impact LU-1 in Section 4.11 and Section 4.15.

RESPONSE TO COMMENT 12-58
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. SANDAG understands the need for vector control and appreciates the information provided by the County and will take these measures into consideration when implementing transportation projects or components of the environmental mitigation programs.
RESPONSE TO COMMENT 12-59

The County’s comments on the NOP were considered during preparation of the Draft EIR.

Mr. Martin
January 13, 2017
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The County looks forward to receiving future documents and/or notices related to this project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Danny Serrano, Land Use / Environmental Planner at (619) 694-3680, or via email at daniel.serrano@sdcounty.ca.gov.

Sincerely,

MARY KOPASKIE, Chief
Advance Planning Division
Planning & Development Services

Email cc: Michael De La Rosa, Policy Advisor, Board of Supervisors, District 1
Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Dustin Stein, Chief of Staff, Board of Supervisors, District 3
Adrian Granda, Policy Advisor, Board of Supervisors, District 4
Melanie Wilson, Policy Advisor, Board of Supervisors, District 5
Vincent Kalliola, CAO Staff Officer, LUEG
Nick Critt, Project Manager, PDS
Everett Hauser, Transportation Specialist, PDS
Bilmaro Carreco, Planner, PDS
Jeff Kash, Planner, DPW
Richard Chin, Associate Transportation Specialist, DPW
Eric Lardy, Chief, Community Health Division, DHE
RESPONSE TO COMMENT 13-1
A map depicting the five different mobility hub types has been added to Chapter 2, Project Description, of the Final EIR as Figure 2-37. Figures 2-2.1 through 2-2.11 have also been added to the Project Description of the Final EIR to provide greater granularity on the Mobility Hub areas and projects in the proposed Plan at a corridor level. A portion of the City of Del Mar is included in the Solana Beach mobility hub, as reflected in Figures 2-2.5 and 2-2.8 in the Project Description of the Final EIR.

RESPONSE TO COMMENT 13-2
Please see response to comment Del Mar 13-1.

RESPONSE TO COMMENT 13-3
Figures 2-20, 2-21, 2-22, and 2-35 are intended to illustrate housing and employment density on a regional scale to demonstrate the process for identifying the areas targeted for development of Mobility Hub Networks. These maps are not intended to demonstrate exact locations of future Mobility Hubs. SANDAG did not include jurisdictional boundaries on these maps because the addition of this layer would have made the maps much harder to read given the amount of information already included. Major regional transportation corridors (i.e., interstates and state routes) are included to provide locational context.
Appendix P1. Response to Comments on the Draft EIR

As SANDAG collaborates with cities on proposed Plan project and policy implementation in the years to come, conceptual Mobility Hub boundaries will be refined while taking into consideration city corridor and land use planning goals and policies, similar to what has already begun as part of the Comprehensive Multimodal Corridor Plans (CMCP) planning and design process. The City’s request will be considered as part of this process. More detailed network-level analysis will be needed within each Mobility Hub to finalize detailed Transit Leap routing, Complete Corridor cross-sections, Flexible Fleet pilots, and supporting technologies.

Response to Comment 13-5
Resilience of transportation infrastructure to climate impacts is a priority of the proposed Plan. As such, the relocation of the rails off of the Del Mar bluffs is a priority project recognized in the Appendix A of the proposed Plan as part of the 2035 Commuter Rail 398 project (Project ID TL06), with planning already underway.

Response to Comment 13-6
The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects subject to project-specific environmental review. The Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and the seasonal platform at the Del Mar Fairgrounds are considered second-tier projects. Callouts showing future second-tier projects on the referenced figure would not be feasible and are not within the scope of this Program EIR’s project description.

Response to Comment 13-7
The Del Mar tunnel is a top priority for SANDAG. Planning work is underway with preliminary engineering, and the environmental phase is expected to begin as soon as 2022 if funding is secured. The Del Mar Tunnel project is in the 2035 phase in the proposed Plan and the inland rail realignment is assumed as part of the tunnel project. Timing for bluffs restoration will be determined as the tunnel and inland rail realignment projects progress.
RESPONSE TO COMMENT 13-8

These figures do not depict the transit leap network at the level of granularity required to complete the request. Route 39B is identified in Table A.5: Interstate North Coast Corridor, in Appendix A of the proposed Plan, as projects TL05, TL06, and TL07.

RESPONSE TO COMMENT 13-9

Specific corridor maps have been added to Appendix A of the proposed Plan so that the reader can see the difference between the proposed Plan projects within each corridor. These will be included as maps A.1 through A.12 in the proposed Plan.

RESPONSE TO COMMENT 13-10

While not specifically referenced in the 2025 Commuter Rail 398 (COASTER) project, the Bluff Stabilization Project (among others) is included in that phase, and those cost are represented in the $1.2 billion cost assumptions. Also, the Del Mar Tunnel project is included in the 2035 phase. Specific alignments will be chosen once the project goes through the project-level environmental analysis phase. Relocation away from the bluffs is assumed as part of the tunnel project in the 2035 phase. The Del Mar platform is part of the San Dieguito Double Track Project, which is included in the 2025 Commuter Rail 398 project grouping.

RESPONSE TO COMMENT 13-11

The Del Mar platform is part of the San Dieguito Double Track Project, which is included in the 2025 Commuter Rail 398 project grouping. Relocation away from the Bluffs is assumed as part of the tunnel project in the 2035 phase.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 13-12

The text on page 4.1-11 of the EIR, in Table 4.1-3, has been updated as described in response to comments Del Mar 13-13 through Del Mar 13-15, in regards to additional provisions in the City’s codes related to scenic resources.

RESPONSE TO COMMENT 13-13

The City of Del Mar Municipal Code reference in Table 4.1-3 has been updated to reference the correct section of the Municipal Code (Chapter 23.51).

RESPONSE TO COMMENT 13-14

The “Visual Plan or Regulation” column on Table 4.1-3 has been updated to include a brief discussion of Municipal Code Chapter 30.52, Bluff, Slope, and Canyon Overlay Zone.

RESPONSE TO COMMENT 13-15

The “Local Scenic Resources” column on Table 4.1-3 has been updated to include the references to the Implementing Ordinances (2001) and to list “canyons and steep slopes” as resources identified in the listed documents.

RESPONSE TO COMMENT 13-16

The Draft EIR correctly states that “some of the other local jurisdictions within the San Diego region have adopted scenic highway general plan elements or programs.” Identifying all local scenic roadways or corridors within each jurisdiction is not necessary for programmatic impact analysis in the EIR. The project-specific evaluation of potential aesthetics impacts resulting from planned 2035 development in/adjacent to the City of Del Mar including the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, will occur during the project-specific environmental review process for these improvements.
RESPONSE TO COMMENT 13-17
Page 4.1-17 of the EIR, provides a general characterization of the coastal scenic resources, including scenic vistas in the North County area that would be affected by new development, and includes the long-range views of the coastal mountain ranges and habitat preserves, unobstructed views of the Pacific Ocean from the Pendleton-De Luz area, and views of highly scenic lagoons and waterways such as Batiquitos, Agua Hedionda, Buena Vista, San Elijo, and Los Peñasquitos Lagoons, and the San Dieguito and San Luis Rey Rivers along the I-5 corridor. As stated in the EIR, the locations of some transportation network improvements and certain design features (e.g., above-grade facilities, retaining walls, sound attenuation walls, cut-and-fill activities) cannot avoid physical changes that have substantial adverse effects on scenic vistas, including blocking panoramic views or views of major landscape features or landforms. The EIR concludes that implementation of regional growth and land use change and transportation network improvements would result in new development and infrastructure affecting scenic resources, including trees, rocks, outcroppings, and historic structures within a state scenic highway and local scenic routes and protected public viewsheds. The impact in the year 2035 is significant. Also, see response to comment Del Mar 13-16 regarding program-level vs. project level CEQA analysis of aesthetics impacts.

RESPONSE TO COMMENT 13-18
The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects would be subject to project-specific environmental review. With a programmatic level of analysis, the EIR provides a general assessment of potential impacts in the coastal regions, as discussed above. The evaluation of potential aesthetics impacts resulting from second-tier projects, including planned 2035 development in/adjacent to the City of Del Mar such as the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, will occur as part of the project-specific environmental review process for these improvements.
RESPONSE TO COMMENT 13-19
See response to comment Del Mar 13-18 above.
RESPONSE TO COMMENT 13-20
See response to comment Del Mar 13-18 above.

RESPONSE TO COMMENT 13-21
See response to comment Del Mar 13-18 above.

RESPONSE TO COMMENT 13-22
Reference to the “North County Fair” has been amended to “Westfield North County Shopping Center” on pages 4.1-23, 4.1-30, and 4.1-39 of the EIR.

RESPONSE TO COMMENT 13-23
See response to comment Del Mar 13-22 above.

RESPONSE TO COMMENT 13-24
Page 4.1-43 of the EIR states that “due to the highly urbanized nature of the area surrounding these improvements (increases in service for the COASTER), substantial sources of additional lighting and glare would not occur.” The text has been amended to include increases in Amtrack and Freight Service. The EIR does not dismiss aesthetic impacts but acknowledges that impacts would occur on a local level and would be evaluated at a local level on a project-by-project basis. Therefore, the detailed analysis relative to the proposed Del Mar Tunnel including security and/or maintenance lighting will be evaluated at the project-specific level, at which time the level of impacts will be determined and appropriate mitigation measures will be identified.
As stated above, detailed analysis related to the new lighting and/or glare effects from train lights, increased train frequency, and any associated lighting for the Del Mar Tunnel and inland rail realignment from the Del Mar Bluffs, will be evaluated at the project-specific level, at which time the level of impact will be determined and appropriate mitigation measures will be identified.

RESPONSE TO COMMENT 13-26
These are general comments about the Draft EIR analysis and CARB definitions. The DEIR is in agreement with these comments and no changes have been made. The air quality analysis does not need to be updated to reflect increased service associated with COASTER, AMTRAK, and freight, as well as the Del Mar Tunnel, because the increase in service due to transportation improvements is already accounted for in emissions estimates and modeling. Moreover, the design of the Del Mar Tunnel is not yet known; therefore, it is not possible to analyze detailed construction and operation effects. Regardless, mitigation measures in the EIR would apply to future construction of future tunnels. For example, mitigation measure AQ-5b ensures railway tunnels or other underground features are designed to help reduce localized toxic air contaminant concentrations at sensitive receptors and are located as far away as feasibly possible from nearby sensitive receptors. No changes to the analysis are required.

RESPONSE TO COMMENT 13-27
See response to comment Del Mar 13-26. Additionally, mitigation measure AQ-2b ensures that all new train purchases shall be zero emission after 2035. No changes to the analysis are required.
RESPONSE TO COMMENT 13-28

This is a general comment that references the fact that use of Tier 4 despite increases in rail service would decrease emissions. The commenter notes that new Tier 4 engines are not a mitigation measure. No specific comment requiring a response is provided.

RESPONSE TO COMMENT 13-29

The air quality analysis assumes that all passenger lines will be operating with Tier IV or better engines by 2025. However, both the Coaster and Amtrak Pacific Surfliner lines are operating their full fleet with Tier IV locomotives today, which is ahead of the schedule assumed in the Draft EIR. Both Coaster and Amtrak have retired the older diesel locomotives that were assumed under the EIR's baseline conditions. Moreover, any new locomotive purchases will be Tier IV or better, in compliance with federal locomotive standards (40 CFR 1033). The suggested additional analysis and mitigation measure are not required.

RESPONSE TO COMMENT 13-30

Please see responses to comments Del Mar 13-27 and Del Mar 13-29 above.

RESPONSE TO COMMENT 13-28

This is a general comment that references the fact that use of Tier 4 despite increases in rail service would decrease emissions. The commenter notes that new Tier 4 engines are not a mitigation measure. No specific comment requiring a response is provided.

RESPONSE TO COMMENT 13-29

The air quality analysis assumes that all passenger lines will be operating with Tier IV or better engines by 2025. However, both the Coaster and Amtrak Pacific Surfliner lines are operating their full fleet with Tier IV locomotives today, which is ahead of the schedule assumed in the Draft EIR. Both Coaster and Amtrak have retired the older diesel locomotives that were assumed under the EIR's baseline conditions. Moreover, any new locomotive purchases will be Tier IV or better, in compliance with federal locomotive standards (40 CFR 1033). The suggested additional analysis and mitigation measure are not required.

RESPONSE TO COMMENT 13-30

Please see responses to comments Del Mar 13-27 and Del Mar 13-29 above.
RESPONSE TO COMMENT 13-31
Please see responses to comments Del Mar 13-27 and Del Mar 13-29 above.

RESPONSE TO COMMENT 13-32
A call-out has been added to Figure 4.4-2 identifying the San Dieguito and Los Penasquitos lagoons in the Final EIR.

RESPONSE TO COMMENT 13-33
A call-out has been added to Figure 4.4-2 identifying the San Dieguito and Los Penasquitos lagoons in the Final EIR.

RESPONSE TO COMMENT 13-34
The cited ordinances in this comment were added to Table 4.4-6 in the Final EIR.

RESPONSE TO COMMENT 13-35
The cited ordinances in this comment were added to Table 4.4-6 in the Final EIR.

RESPONSE TO COMMENT 13-36
The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. Specific projects under the proposed plan, including the Del Mar Tunnel, Inland Rail alignment from the Del Mar Bluffs, Commuter Rail 398, and restoration of the Del Mar Bluffs, would be subject to project-specific environmental review, and the alignment, alternatives, and biological resources analysis will be included in the project-specific environmental review.
on vegetation communities for each horizon year. The City provided an earlier comment under Chapter 2, Project Description where it requested a narrative be added describing the planned realignment of the Commuter Rail network through the Del Mar rail corridor. In this comment, the City requested clarification be made regarding the horizon years for: 1) the Del Mar Tunnel, which appears to be 2035 based on the DEIR Project Description; 2) the inland rail realignment from the Del Mar Bluffs, which is not specifically noted in the DEIR, but implied due to a Del Mar Tunnel being included; and 3) the associated restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures.

Related to planned Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs (Commuter Rail 398), and restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, the DEIR does not sufficiently describe the potential impacts to vegetation communities for each horizon year in Appendix E-6, Tables E-6-2 and E-6-3. As shown below, Table E-6-2 is for the 2035 horizon year and indicates Commuter Rail 398 would result in impacts to 0.6 acres of Coastal Scrub habitat. If the Del Mar Tunnel is proposed for horizon year 2035, regardless of the final alternative alignment selected, it is anticipated that a greater area of habitat impacts would result from both temporary construction and permanent impacts associated with the construction of a Del Mar Tunnel. This is because the City is bordered by two lagoons, Los Peñasquitos to the south (which Commuter Rail 398 currently is located within) and San Dieguito to the north. Further, the City is bordered by the Torrey Pines State Natural Reserve Extension on the City’s south slope and Crest Canyon on its north slope – areas that include a diversified mix of native plants and trees. It is reasonable that greater upland impacts would result from tunneling through or adjacent to a hillside.

**Appendix E-6, Table E-6-2 (2035)**
Similarly, Table E-6-3 for the 2050 horizon year indicates Commuter Rail 398 would result in impacts to 0.2 acres of Marsh habitat and 0.4 acres of Riparian Scrub habitat. As noted in the City’s Project Description comment, it is unclear if the inland rail realignment and/or restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures is planned for horizon year 2035 or 2050 as this information is not provided in the DEIR (DEIR only references the Del Mar Tunnel).

Based on the identified impacts in Table E-6-3, wetland and riparian impacts are noted for Commuter Rail 398. It is unclear if these impacts are associated with the inland rail realignment. If the inland rail realignment is proposed for horizon year 2050, regardless of the final alternative alignment selected, it is anticipated that a greater area of habitat impacts would result from both temporary construction and permanent impacts associated with the construction of a Del Mar Tunnel. This is because the City is bordered by two lagoons, Los Penasquitos to the south (which Commuter Rail 398 currently is located within) and San Dieguito to the north. It is reasonable that greater impacts to wetland and/or riparian habitat would result from any of the inland rail realignment alternatives due to existing conditions in the Del Mar area. Further, the Table does not include reference to and analysis of the planned seasonal platform at the Del Mar Fairgrounds for either 2035 or 2050 which is also in vicinity to the San Dieguito Lagoon.

**Appendix E-6, Table E-6-3 (2050)**

**Request:** In addition to clarifying the horizon years for inland rail relocation from the Del Mar Bluffs and planned seasonal platform at the Del Mar Fairgrounds, the City requests a sufficient level of analysis be provided in the impact section and Appendix E-6 related to planned improvements to Commuter Rail 398 through and adjacent to the City of Del Mar – and in particular the Los Penasquitos and San Dieguito Lagoons, Torrey Pines State Natural Reserve Extension, and Crest Canyon.

Until this clarification is made and sufficient analysis is included in this impact section, the City is unable to provide further comment on the impacts, conclusions, and/or mitigation measures at this time.
RESPONSE TO COMMENT 13-40

The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Del Mar Tunnel project, which is a second-tier project, falls within the 2035 horizon year in the proposed Plan, and the inland rail realignment and bluffs restoration project are assumed as part of the tunnel project.

RESPONSE TO COMMENT 13-41

Please see response to comment Del Mar 13-40.

RESPONSE TO COMMENT 13-42

See responses to comments Del Mar 13-43 through Del Mar 13-45 for specific requests.

RESPONSE TO COMMENT 13-43

Suggested components of the City of Del Mar’s LCP have been incorporated into Table 4.7-3 in Section 4.7, Geology, Soils, and Paleontological Resources.

RESPONSE TO COMMENT 13-44

Suggested reference to the City of Del Mar’s Sea Level Rise Adaptation Plan has been incorporated into Table 4.7-3 in Section 4.7.
18. COMMENT – GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

Page 4.7-34

The DEIR describes continued double-tracking at certain locations on the LOSSAN rail corridor by horizon year 2035, but does not list the Del Mar Tunnel, the inland rail relocation from the Del Mar Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed temporary bluff stabilization measures, or the planned seasonal platform at the Del Mar Fairgrounds. Further, it is unclear which horizon years the inland rail relocation and seasonal platform are planned for.

Request: The City requests inclusion of the Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and planned seasonal platform at the Del Mar Fairgrounds in the impact section and analysis as applicable. Provided that all three components would generally be sited within wetland areas with high liquefaction potential and/or hillside with potential seismic-related ground failure and/or landslides, until these components

RESPONSE TO COMMENT 13-45

Suggested references to the City of Del Mar's Municipal Code have been incorporated into Table 4.7-4 in Section 4.7.

RESPONSE TO COMMENT 13-46

See response to comment Del Mar 13-47.

RESPONSE TO COMMENT 13-47

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and the seasonal platform at the Del Mar Fairgrounds are considered second-tier projects.
As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, and the seasonal platform at the Del Mar Fairgrounds are considered second-tier projects, and because the specifications of second-tier projects such as the timing, location, and size, associated with implementation of the proposed Plan, are not known at this time, conclusions regarding the specific geologic risks related to the above-referenced second-tier projects would be speculative.
20. COMMENT – GREENHOUSE GAS EMISSIONS
Page 4.8-24

RESPONSE TO COMMENT 13-50
The DEIR describes the Del Mar Tunnel and continued double-tracking at certain
locations on the LOGSAN rail corridor by horizon year 2035, but does not list the inland
rail relocation from the Del Mar Bluffs, and restoration of the Del Mar Bluffs, including
the removal of installed temporary bluff stabilization measures, or the planned
seasonal platform at the Del Mar Fairgrounds. Further, it is unclear which horizon
years these components are planned for.

Request: The City requests inclusion of the inland rail relocation from the Del Mar
Bluffs, the restoration of the Del Mar Bluffs, including the removal of installed
temporary bluff stabilization measures, and planned seasonal platform at the Del Mar
Fairgrounds in the impact section and analysis as applicable.

RESPONSE TO COMMENT 13-51
See response to comment Del Mar 13-50.

RESPONSE TO COMMENT 13-52
The DEIR states that “the planned transportation network improvements for 2035 are
described above” which is a reference to a general list of horizon year 2035 projects on
page 4.11-30. However, there is no reference made in the impact section to the
Del Mar Tunnel, inland rail relocation from the Del Mar Bluffs, or restoration of the Del
Mar Bluffs, including the removal of installed temporary bluff stabilization measures.
As previously noted in earlier comments, the horizon year for the Del Mar Tunnel is
2035 but a reference to an inland rail relocation and its associated horizon year (2035
or 2050) or the restoration of the Del Mar Bluffs, including the removal of installed
temporary bluff stabilization measures, is not described in the DEIR. It can be
assumed that if the horizon year for the Del Mar Tunnel is 2035, then the inland rail
realignment and bluffs restoration including removal of temporary measures would
also be 2035. However, as previously noted in the City’s Biological Resources
comments, the 2035 impacts for Commuter Rail 398 only affect a small portion of
Coastal Scrub habitat, whereas the 2050 impacts for Commuter Rail 398 only affects
a small portion of Marsh and Riparian Scrub habitat.

The DEIR provides three horizon years – 2025, 2035, and 2050. It is clear that a Del
Mar Tunnel is planned for horizon year 2035, which is also described in Appendix A
of the Draft 2021 Regional Plan, Table A.5 as Project ID T106 ("Oceanside to
downtown San Diego (Build Del Mar tunnel, add stations at Central Mobility Hub and
Camp Pendleton, and Grade"). However, as previously commented, it is not clear if
RESPONSE TO COMMENT 13-53

See response to comment Del Mar 13-52. The project components listed in the comment constitute second-tier projects, and this programmatic EIR does not analyze project-specific land use conflicts. The Draft EIR also does not provide a specific schedule for completion of the second-tier projects. SANDAG will continue coordinating with the City of Del Mar, as well as other local jurisdictions, to determine the prioritization and specific timelines of these second-tier projects, including the bluff stabilization project.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 13-54
See responses to comments Del Mar 13-52 and Del Mar 13-53.

As a result of deferring these components post horizon year 2025, the proposed 2021 Regional Plan results in indirect effects that conflict with the City’s adopted and certified Local Coastal Program and in particular the Beach Overlay Zone (B-OZ, Del Mar Municipal Code Chapter 30.50) and the Coastal Bluff Overlay Zone (CB-OZ, Del Mar Municipal Code Chapter 30.55). Both overlays are implementing Ordinances in the City’s certified LCP (2001). The B-OZ chapter of the LCP includes a Shoreline Protection Area (SPA) line that begins at the approximate center-line of the railway tracks and covers the area west as specified in B-OZ Exhibit B. Components of the bluff stabilization projects in conflict with the LCP include exposed vertical retaining structures, soil nail reinforced areas with shotcrete facing, and grading within 40 feet of the top edge of a coastal bluff. Further, DMBS proposes the excavation and removal of an existing coastal bluff berm located west of the track bed and generally below the area of 11th Street and 9th Street.

Under the certified Del Mar LCP (CB-OZ, Del Mar Municipal Code Section 30.55.080), development on coastal bluffs is regulated under the following provisions (in part):

A. Unless otherwise specified herein, all new or redeveloped principal or accessory structures, including new supporting foundations or supports for existing structures, shall be set back a minimum of 40 feet from the top edge of the coastal bluff as defined in this Chapter. [emphasis added]

C. No grading shall be allowed within 40 feet of the top edge of a coastal bluff. [emphasis added]

D. No grading or construction activities shall be allowed on the face of a coastal bluff unless approved as part of a Shoreline Protection Permit or Setback Seawall Permit issued in accordance with the provisions of this Title and when the...
RESPONSE TO COMMENT 13-55

See responses to comments Del Mar 13-52 and Del Mar 13-53. The proposed Plan identifies funding to kick start the environmental, design, and right-of-way phases of the Del Mar Tunnel project by 2025 with construction funding in the 2035 phase, and the inland rail realignment is assumed as part of the tunnel project. Timing for bluffs restoration will be determined as the tunnel and inland rail realignment projects progress. During project-specific analysis of second-tier projects, specific conflicts with reports such as the DMB5 Alternative Analysis Report will be considered.
RESPONSE TO COMMENT 13-56
See responses to comments Del Mar 13-52 and Del Mar 13-53.

RESPONSE TO COMMENT 13-57
See responses to comments Del Mar 13-52 and Del Mar 13-53. The EIR’s conclusion of less than significant for Impact LU-2 need not be re-evaluated because it is based on a programmatic vs. project-specific analysis of land use conflicts.

RESPONSE TO COMMENT 13-58
See response to comment Del Mar 13-52.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 13-59
Requested text has been added to page 4.11-31 in the EIR. In addition, see response to comment Del Mar 13-52.

RESPONSE TO COMMENT 13-60
Table 4-13-4 includes the typical construction equipment mix that could be used in projects that would occur under the proposed Plan. The table is not meant for project-level analysis and does not include an exhaustive list of construction equipment, as the EIS is a program-level document. The exact mix of construction equipment for the commenter-referenced project would be included in project-level environmental documents.

RESPONSE TO COMMENT 13-61
See response to comment Del Mar 13-60. As discussed, the table is not meant to be exhaustive, and it is unknown at this time what type of tunneling equipment will be utilized for the project. Specific analysis will be conducted during project-level analysis.

RESPONSE TO COMMENT 13-62
As noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. Noise increases associated with projects that would occur under the proposed Plan are discussed under Impact NOI-1 in Section 4.13, Noise and Vibration. The discussion is programmatic and outlines some of the projects that would occur during the time horizons referenced in the document. References to future projects in the impact analyses were provided as examples of the types of projects that could occur by those horizon years, and were not intended to be an exhaustive list of all second-tier projects that would occur by that horizon year.

RESPONSE TO COMMENT 13-63
See response to comment Del Mar 13-62.
RESPONSE TO COMMENT 13-64
See response to comment Del Mar 13-62.

RESPONSE TO COMMENT 13-65
See response to comment Del Mar 13-62.

RESPONSE TO COMMENT 13-66
Additional recently adopted housing legislation related to streamlining approval for high density housing or housing within Transit Priority Areas has been incorporated into the Regulatory Setting in Section 4.14, Population and Housing.

RESPONSE TO COMMENT 13-67
See response to comment Del Mar 13-67. In addition, as noted above, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Next Gen Rapid bus service would be a second-tier project, and analysis of direct and indirect impacts associated with these second-tier projects would occur during project-specific environmental review.
RESPONSE TO COMMENT 13-68

The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The Next Gen Rapid Bus service is considered a second-tier project, and the specifications of these projects such as the timing, location, and size would be defined and specific impacts related to project characteristics would be identified during project-level analysis.

RESPONSE TO COMMENT 13-69

See response to comment Del Mar 13-68.

RESPONSE TO COMMENT 13-70

Language has been added to Table 4.19-2 to clarify that the City of Del Mar Safety Element was updated in 2019. Wildfire is now listed as a “potential hazard” in Table 4.19-2.
RESPONSE TO COMMENT 13-71
The statement that “Wildfire is not mentioned in the Safety Element” was removed from Table 4.19-2.

RESPONSE TO COMMENT 13-72
This is an introductory comment for the following comments. No response is required.

RESPONSE TO COMMENT 13-73
See Master Response 1 regarding the range of alternatives analyzed in the EIR. In addition, the comment requests analysis of an alternative to a specific project, not an alternative to the proposed Plan. Such a project would be a second-tier project and would have project-specific alternatives analysis as part of its environmental review. The proposed project-specific alternative is therefore not an appropriate alternative for this first-tier Program EIR.

RESPONSE TO COMMENT 13-74
See Master Response 1 regarding the range of alternatives analyzed in the EIR, and response to comment Del Mar 13-73.
RESPONSE TO COMMENT 13-75
See Master Response 1 regarding the range of alternatives analyzed in the EIR. As noted in the comment, the Coastal Protection Alternative was rejected from further consideration because it is a “second-tier” project-specific alternative. An EIR is not required to consider alternatives to a project component, and instead focuses on alternatives to the project (in this case the proposed Plan) as a whole. California Native Plant Society v. City of Santa Cruz (2009) 177 Cal. App. 4th 957,993.

RESPONSE TO COMMENT 13-76
See response to comment Del Mar 13-75.

RESPONSE TO COMMENT 13-77
See response to comment Del Mar 13-75.
RESPONSE TO COMMENT 13-78

SANDAG would like to thank the City of Del Mar again for the comments on the DEIR. We look forward to continued coordination, and a copy of this response to comments will be provided via email to City staff as requested. Please continue to follow along in this process by visiting SDForward.com.
COMMENT LETTER 14: DESCANSO COMMUNITY PLANNING GROUP

From: Descanso Planning Group <descanso2000@gmail.com>
Sent: Tuesday, October 5, 2021 11:06:07 PM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Subject: Request for Comments on the DEIR Regional Plan

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

Kirsten Lichko,

I am sending you the DESCANSO Community Planning Group comments on the Draft EIR for SANDAG 2021 Regional Plan, attached.
I am also sending you a copy USPS.

As residents of the unincorporated community of Descanso, we feel we have not received any public outreach on this process, nor has any community in the East County Rural areas.
The comment letter will outline our community's concerns of inequity, lack of representation, lack of services and being "taxed" without representation.

I look forward to more inclusion of the unincorporated areas of the County in the next iteration of the DEIR and revision of the Regional Plan.
Kerry Forrest,
Chair Descanso Community Planning Group

RESPONSE TO COMMENT 14-1

SANDAG appreciates the Descanso Community Planning Group's (DCPG) feedback on the proposed Plan and your participation in the environmental review process. Please refer to subsequent responses to your comments below for detailed responses regarding your concerns.
RESPONSE TO COMMENT 14-2

The comment raises concerns about the proposed Plan not benefiting those who reside outside of the Mobility Hub Network. The comment does not raise any concerns about the adequacy of the EIR. No further response is required.

RESPONSE TO COMMENT 14-3

ANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of a NOP. Receipt of the NOP by the State Clearinghouse at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017. The NOP provided formal notification to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR was to be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG with specific comments and questions on the scope and content of this EIR. Appendix A summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

Consistent with CEQA (PRC Section 21083.9), SANDAG noticed and held a public scoping meeting on December 8, 2016, at SANDAG’s office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a Public Involvement Plan (PIP) to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-
Appendix P. Response to Comments on the Draft EIR

income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan.

The Draft EIR for the proposed Plan was released to the public on August 27, 2021, and was available for a 45-day public review period, as required by CEQA. SANDAG published a Notice of Availability (NOA) for the Draft EIR in local newspapers on August 27, 2021, and mailed the NOA to an extensive distribution list. SANDAG also filed a Notice of Completion (NOC) with the State Clearinghouse to indicate the availability of the Draft EIR for public review and comment on August 27, 2021. The Draft EIR was distributed to the agencies, organizations, and individuals that provided written comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, and other interested parties and stakeholders. Agencies, organizations, and individuals were invited to provide written comments on the Draft EIR during the public review period from August 27 to October 11, 2021.

The Draft EIR and all appendices were available for review online at www.sdforward.com; at SANDAG offices located at 401 B Street, Suite 800, San Diego, California 92101; and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library will facilitate inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the Public Comment period.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting discussing adoption of the proposed Plan and certification of the EIR.
Appendix P1. Response to Comments on the Draft EIR

The Plan includes an investment in the backbone fiber infrastructure needed to support the transportation network; however, SANDAG is also developing a Regional Digital Equity Strategy & Action Plan to support the expansion of broadband county-wide. The Strategy & Action Plan will define strategies for expanding broadband and internet connectivity in the San Diego region to support quality of life, transportation, and equity.

RESPONSE TO COMMENT 14-5

The proposed Plan includes Mobility Hubs for East County which can facilitate creating additional economic opportunities within that hub. Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. They offer on-demand travel options and supporting infrastructure to enhance connections to high-quality Transit Leap services while helping people make short trips around the community on Flexible Fleets. Mobility Hubs will be implemented in close coordination with local jurisdictions to align with the unique needs of each community.

SANDAG is also developing a Flexible Fleet Implementation Strategic Plan to identify near-term opportunities for Flexible Fleet pilots that support mobility, equity, and sustainability goals.

The Intraregional Tribal Transportation Strategy was used to inform many of the improvements identified for the rural corridors. These examples have been added to the description of rural corridor improvements in Appendix A of the proposed Plan in the section titled Rural Corridors and Table A.12: Rural Corridors.

RESPONSE TO COMMENT 14-6

The Plan includes investments in Flexible Fleets, expansion of broadband, investment in zero emission vehicles, and improvements on rural corridors. These benefit rural communities with improved access to mobility options via technology, increased safety on hazardous roads particularly during emergency situations, and advanced deployment of zero emission vehicles.

RESPONSE TO COMMENT 14-7

The Comprehensive Multimodal Corridor Plans identify ways to improve roadway safety, enhance the urban-rural transportation interface (with special consideration given to limiting impacts on
surrounding environmental habitats and wildlife), engage with tribal nations, and create greater trip reliability and efficiency throughout the study area while supporting climate action initiatives. The suite of solutions will include active transportation, clean transportation, transit, resilience and environment, right-of-way and utilities, equity, and evacuation considerations.
RESPONSE TO COMMENT 14-8

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as rural residents, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system. For example, drivers of fuel-powered vehicles in the state of Oregon receive a credit for fuel tax and remote emissions testing through their road usage charge program called OReGO.

RESPONSE TO COMMENT 14-9

The proposed Plan includes a variety of projects and programs to improve the transportation system for all modes of transportation in the San Diego region over 30 years. This includes investments to improve roads and freeways as well as public transit and active transportation. Gas tax revenues have been declining as vehicles become more fuel efficient and more electric vehicles are on the roads. A road usage charge would be a new funding mechanism to replace the gas tax. Road usage charges are being considered by transportation agencies across the country.

RESPONSE TO COMMENT 14-10

Investments in the proposed Plan for unincorporated communities include improvements to local bus service (increased frequencies and span of service) and Flexible Fleet services. Attachment 1 to Appendix A of the proposed Plan provides the frequencies and spans of service...
proposed for Transit Leap, including local bus routes. In addition, the investments in the mobility hubs also serve residents of the unincorporated area as many residents live near a mobility hub and will be able to access the transit system within a reasonable amount of time on a Flexible Fleet service, then be able to make use of the Rapid bus, light rail, or commuter rail systems.

SANDAG looks forward to coordinating with the County on many areas of implementation for the proposed Plan including the Flexible Fleet Implementation Strategic Plan, Active Transportation Plan, Comprehensive Multimodal Corridor Plans, and advanced transit planning. All of these efforts provide opportunities for refinement of the proposed Plan concepts at a local level.

The proposed Plan puts in place a regional framework for a reimagined transportation system. The plans and studies identified as implementation actions in Appendix B of the proposed Plan will provide opportunities for SANDAG to work closely with the County to apply the 5 Big Moves concepts to the unincorporated areas and improve mobility options and safety.

**RESPONSE TO COMMENT 14-11**

The proposed Plan considers the current and future needs of the whole region, including unincorporated communities. The reimagined transportation system offers benefits that extend through the region as residents and visitors travel outside their communities for work, recreation, school, entertainment, and accessing basic needs. The investments in Next OS, Flexible Fleets, Mobility Hubs, and other programs are presented as regional investments, and SANDAG intends to work collaboratively with each jurisdiction to implement the proposed Plan and customize mobility solutions for the unique needs of each community.
COMMENT LETTER 15: ENDANGERED HABITATS LEAGUE

RESPONSE TO COMMENT 15-1

Thank you for the Endangered Habitat League’s participation in the environmental review process. Further elaboration regarding your organization’s comments is addressed below.

RESPONSE TO COMMENT 15-2

This comment states that the Draft EIR should include “advanced, programmatic mitigation” of biological impacts, specifically, that funds should be set aside for the acquisition and management of habitat plans. As an initial matter, the EIR found that the proposed Plan has no significant impacts relating to conflicts with the provisions of adopted HCPs, NCCPs, or other conservation plans, or any local policies or ordinances protecting biological resources.

To meet the region’s habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). As identified in Appendix B of the proposed Plan, SANDAG will continue to monitor the implementation of the Plan on a four-year cycle and make the data accessible to the public. Please refer to Master Response 1 for additional discussion regarding including a regional habitat conservation fund.
COMMENT LETTER 16: FRIENDS OF ROSE CREEK

RESPONSE TO COMMENT 16-1
Thank you for the Friends of Rose Creek's participation in the environmental review process; further elaboration regarding your organization's comments will be addressed in subsequent responses below.

RESPONSE TO COMMENT 16-2
This comment relates to the proposed Plan, and not the analysis in the Draft EIR. Many of the complete corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

RESPONSE TO COMMENT 16-3
This comment accurately recites content of the Draft EIR. As identified in Section 4.4 of the EIR, implementation of mitigation measures would reduce impacts related to biological resources. However, there is no assurance that mitigation measures would be implemented for all projects or be equally effective due to the wide variety of circumstances, complexity of some sites, complexity of impacts on those sites, lack of available mitigation sites, shortage of acreage at mitigation banks, mitigation complexity and cost, lack of long-term management and monitoring, and lack of enforcement. Instances may occur in which impacts are not reduced to less-than-significant levels. Therefore, these impacts have been identified as significant and unavoidable.
RESPONSE TO COMMENT 16-4

This comment relates to the proposed Plan, and not the analysis in the Draft EIR.

See response to comment FORC 16-3.

In addition, many of the complete corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

The conservation of native species and their habitat is a key component of SANDAG’s SCS. The land use pattern of the proposed Plan envisions greater compact development in areas served by high frequency, efficient transit. The result is less urban sprawl and fewer impacts on native habitat and species. Appendix AA, Regional Habitat Conservation Vision of the Regional Plan, describes the region’s efforts to develop and implement a system of open space for conservation of San Diego’s unique biodiversity.

RESPONSE TO COMMENT 16-5

The Draft EIR does not find that transportation projects within existing rights-of-way categorically avoid impacts on biological or recreational resources. Both Sections 4.4 and 4.15 analyze impacts of the proposed Plan’s transportation projects, projects within and outside existing rights-of-way.

As discussed in prior responses, where impacts on biological resources cannot be avoided, mitigation has been identified to avoid and reduce these impacts for the future construction of transportation and land use projects. Through the implementation of the proposed Plan, SANDAG will continue to support habitat conservation with the proposed establishment of the $565 million Nature-Based Climate Solutions Program.

RESPONSE TO COMMENT 16-6

SANDAG acknowledges that more work needs to be done in this area and that various climate action plans developed for the region, along with federal and State agency initiatives, are being incorporated as
Appendix P1. Response to Comments on the Draft EIR

SANDAG’s comprehensive strategies for addressing climate change in this and future regional plans.
COMMENT LETTER 17: FRIENDS OF ROSE CANYON

October 11, 2021

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

Submitted via email: Kristen.Uchitel@sandag.org

Subject: Comments on the Draft EIR for San Diego Forward: The 2023 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 52/805 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.

RESPONSE TO COMMENT 17-1

Thank you for your participation in the environmental review process and for the detailed comments for SANDAG’s consideration. For comments related to the San Diego Coastal Rail Trail Project, please refer to Appendix P.2 under Comment ID #1126. For other comments included in this letter, please refer to detailed responses below.

RESPONSE TO COMMENT 17-2

This comment is related the proposed Plan, not the analysis within the Draft EIR.

The proposed Plan is focused on creating more mobility options for all people in the San Diego region through a fast, reliable, and fair public transportation system and micromobility options including e-bikes and scooters, rideshare, and microtransit shuttles. The proposed Plan also proposes a network of Managed Lanes using existing infrastructure that provide priority access to people using transit, carpooling, or vanpooling. The Managed Lane network supports transit services, making transit a compelling alternative to driving.

The final draft of the proposed Plan has been updated to reflect 2030 as the start of implementation for the road usage charge to better align with the timing that the State and other regions are expecting for transitioning to a road usage charge.

The planned transit frequency improvements and spans of services for all routes, including existing local service and future regional services, will be added to Appendix A of the proposed Plan and can be currently viewed as part of the Social Equity Working Group agenda from August 5, 2021.

Regarding an alternative that prioritizes transit over the construction of new highway capacity, please see Master Response 1.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 17-3

Please see response to comment Del Mar 13-36 regarding the programmatic nature of the EIR. The EIR addresses mitigation on a programmatic level. On a project-specific level, and as often required by the regulatory agencies and local ordinances, onsite mitigation and mitigation within the same watershed is preferred, but if mitigation lands are not available, mitigation may need to occur elsewhere. The Draft EIR does not make a finding that impacts are “acceptable” or “unacceptable.”

RESPONSE TO COMMENT 17-4

This comment provides a concern with the mitigation of a previous SANDAG project and does not provide a comment regarding the adequacy of this EIR. Therefore, no further response is required. However, the comment will be provided to the SANDAG Board of Directors for their consideration.

RESPONSE TO COMMENT 17-5

Please see response to comment FRC 17-3. The EIR provides programmatic mitigation measures to address impacts of the overall proposed Plan. The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document. The Draft EIR discloses that offsite mitigation and mitigation banks are part of the programmatic mitigation measures (see BIO-1b, BIO-1c, BIO-2b, BIO-2c). The Draft EIR also discloses that despite implementation of these mitigation measures, impacts would remain significant and unavoidable.

RESPONSE TO COMMENT 17-6

This comment relates to the content of the proposed Plan, not the Draft EIR. Please see response to comments FRC 17-3 and FRC 17-5.

RESPONSE TO COMMENT 17-7

SANDAG’s proposed Plan includes freeway improvements along I-5 and implementation of the Coastal Rail Trail in this area for the 2035 horizon, as well as the SR 52 bikeway from I-5 to Santo Road that would impact Marian Bear Memorial Park. Although SANDAG appreciates the concerns expressed in this comment, the improvements are required to...
accommodate planned population growth and related transportation improvements identified in the proposed Plan. The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document, including the implementation of mitigation measures identified in Section 4A, *Biological Resources*, of the EIR.
RESPONSE TO COMMENT 17-8

This comment relates to components of the proposed Plan, not the analysis within the Draft EIR. Many of the complete corridor projects in the Draft Plan utilize existing right-of-way, and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

RESPONSE TO COMMENT 17-9

Please see response to comment FRC 17-7. In addition, as discussed in Section 4.4, the transportation network improvements projected in the proposed Plan would impact wildlife movement. As noted under regional growth and land use change, adherence to the existing federal, State, and local laws, regulations, and programs discussed in Section 4.4.2 would reduce impacts on wildlife movement; however, it cannot be concluded that adherence would result in less-than-significant impacts for all projects. Considering both direct and indirect impacts, transportation network improvements under the proposed Plan would interfere substantially with fish and wildlife movement, wildlife corridors, and nursery sites. This would be a significant impact.

The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects that would be subject to project-specific environmental review. Specific projects that would impact on Marian Bear Park would be considered second-tier projects and would be subject to project-specific environmental review.

RESPONSE TO COMMENT 17-10

This comment relates to components of the proposed Plan, not the analysis within the Draft EIR.

The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to achieve meeting State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with
appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

Improvements to arterials are primarily part of SANDAG’s Complete Corridor Regional Arterials. Complete Corridors are designed to provide priority access for transit and flexible fleet shared ride services on our regional arterials, and provide safe and comfortable transportation options to get people to their destinations safely and efficiently.

**RESPONSE TO COMMENT 17-11**

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the proposed Plan. The activity-based model and other analyses used to inform the proposed Plan have been reviewed through SANDAG’s peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D. Where possible, the Plan proposes repurposing of general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network.

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals like GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle: the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers. The study will determine how existing revenues currently fund different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources. This study will also give SANDAG a better idea of the interaction between included demand and usage-based fees.
RESPONSE TO COMMENT 17-12

Although this comment uses the term “DEIR,” the substance of the comment relates to components of the proposed Plan, not the analysis within the Draft EIR.

The comment summarizes information provided in Table 4.16-6, Roadway Network Analysis — Year 2025, from Section 4.16, Transportation, of the Draft EIR regarding the number of lane miles of roadway that would be added under the proposed Plan. Generally, this summary provides introductory information for the following comments. However, the proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to achieve meeting State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

RESPONSE TO COMMENT 17-13

Although this comment uses the term “DEIR,” the substance of the comment relates to components of the proposed Plan, not the analysis within the Draft EIR.

As discussed in Appendix V of the proposed Plan, the Managed Lanes Feasibility Tool was used to forecast Managed Lane performance. The Managed Lanes Feasibility Tool is an interactive dashboard model developed by SANDAG’s consultant, HNTB, that can be used to forecast Managed Lane performance and revenues. It has been used by agencies around the country to inform implementation of Managed Lane projects, phasing, and the development of associated operational policies. When outputs from the tool are compared to data from Managed Lanes once they are built, it has been found to be very accurate. The methodology uses revealed preference data from existing operating Managed Lanes across the country that were specifically selected to be representative based on conditions found to be similar to facilities in the San Diego region. The model analyzes existing traffic and
proposed lane configuration for the San Diego facilities that are included in the Managed Lane network to assign traffic volumes. It assumes a baseline volume must be reached before drivers will be willing to pay for the Managed Lanes. Usage of the Managed Lanes is predicted based on the overall level of demand above the baseline volume, available capacity in the Managed Lane, and remaining capacity in the general purpose lanes. It includes assumptions around HOV and clean air vehicle policies and discounts, traffic levels, growth rates, cost assumptions, lane capacity, toll rates, and inflation.

SANDAG will also launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The road usage charge provides an alternative to replace an old tax system that is no longer relevant.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. The mechanism to collect a future road usage charge has not yet been determined, but as the State of California transitions from the gas tax towards a road usage charge, SANDAG is anticipating leveraging the mechanism selected by the State. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving gas fueled vehicles, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system.

**RESPONSE TO COMMENT 17-14**

The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting
connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

**RESPONSE TO COMMENT 17-15**

The project-specific impacts of commuter lane rail and LOSSAN projects will be addressed at the project-specific CEQA level and avoidance, minimization and mitigation measures will be identified pursuant to the Analysis Methodology Section in Chapter 4 of the EIR, and consistent with CEQA, local ordinance and guidelines, and the requirements by the Wildlife Agencies. As noted above, the Draft EIR discloses that the proposed Plan will have significant, unavoidable impacts on biological resources.

**RESPONSE TO COMMENT 17-16**

This comment correctly quotes from the Draft EIR.
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 address the issues 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 three 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 three connectors on SR 52 between 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.

RESPONSE TO COMMENT 17-18

This comment relates to components of the proposed Plan, not the analysis within the Draft EIR. The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to achieve meeting State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes.

In terms of the Managed Lanes proposed on SR 52 between I-5 and I-805 plus Managed Lane Connectors at I-5 and SR 52 and at I-805 and SR 52, the improvements for this segment are envisioned to be within the existing corridor footprint where the Managed Lanes would be designed through repurposing the existing shoulders and landscaped median.

Decisions on where to construct proposed Managed Lane connectors, including defining and designing site-specific elevation profiles and or structural/physical footprint construction components, will be examined through more detailed operational and technical studies. These efforts are generally undertaken during the project development and environmental clearance phase, which is generally carried out with public input and following the CEQA Guidelines to evaluate proposed project impacts and identify necessary mitigation measures.
RESPONSE TO COMMENT 17-19
Thank you for your comment. SANDAG appreciates the summary of Figure 4.4-15.

RESPONSE TO COMMENT 17-20
SANDAG appreciates the summary of impacts on the region's preserve system. The EIR addresses impacts on a programmatic level. Specific impact avoidance, minimization, and mitigation will be developed at the project-specific CEQA level. Please also see response to comment FRC 17-15.

RESPONSE TO COMMENT 17-21
SANDAG appreciates your comment regarding the potential impacts on sensitive vegetation communities from the I-805 from SR 52 to Carrol Canyon Road project, and I-5 widening along Rose Canyon. The comment does not identify any specific comments on the EIR adequacy. No further response is required.

RESPONSE TO COMMENT 17-22
The Direct Access Ramp at Nobel/I-805 has been removed from the proposed Plan. There are a number of constraints that limit the ability of the Rapid bus to access La Jolla Village Drive via the Managed Lanes. The current plan is to use existing ramps or operational improvements that would give the bus some level of priority to enter the existing ramps. More planning will need to occur as this project moves forward.
RESPONSE TO COMMENT 17-23

The referenced statement is not intended to suggest or imply that this document will be used as a means to avoid following proper environmental review procedures for future projects. The statement is only stating that proper project-level environmental documentation will be conducted at the proper time, while following all applicable federal, State, and local environmental review requirements and procedures.
RESPONSE TO COMMENT 17-24

A full response to this letter is included beginning from ID L189 in Appendix P.2.
## Appendix P1. Response to Comments on the Draft EIR

### CRT route as presented in the SANDAG RTP

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

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.

<table>
<thead>
<tr>
<th>Segment</th>
<th>Start</th>
<th>End</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>CRT - I-5 Bicycle Corridor</td>
<td>Sorrento Valley</td>
<td>Voigt and Gilman</td>
<td>Already completed by Caltrans</td>
</tr>
<tr>
<td>CRT - UC San Diego</td>
<td>Voigt and Gilman Dr.</td>
<td>Gilman and La Jolla Village Dr.</td>
<td>UC San Diego is adding major bike infrastructure improvements through the campus on this route</td>
</tr>
<tr>
<td>CRT - Gilman</td>
<td>Gilman Dr. and La Jolla Village Dr.</td>
<td>Gilman Dr. and I-5 / Rose Creek Bike Path and La Jolla Colony Dr.</td>
<td>Protected bike lanes fully designed by City. Partial construction funding in SD City 2022 CIP budget.</td>
</tr>
</tbody>
</table>
Appendix P1. Response to Comments on the Draft EIR

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 UCPC 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 2017.

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 Mall, and the commercial center at UTC.
COMMENT LETTER 18: DAVID GRUBB (QUALITY OF LIFE COALITION)

October 11, 2021

Via Email (RegionalPlanEIR@sandag.org)
Kirsten Uchitel
Associate Planner, SANDAG
401 I Street, Suite 800
San Diego CA 92101

Dear Ms. Uchitel,

Please accept the following comments regarding the Draft 2021 SANDAG Regional Plan (“Regional Plan” or “Plan”) and Draft Environmental Impact Report (“DEIR”).

Please note that these comments have also been included in the combined comments document from the Quality of Life Coalition.

I am suggesting changes to Alternative 3 to avoid some of the significant impacts identified in the DEIR. While the DEIR states that impacts to GHG Emissions and Air Quality are “unavoidable”, that is not correct. Some of these impacts can be avoided or mitigated by changes to the Plan, as described below.

I. Eliminate all addition of freeway lanes.

The Regional Plan preposits to add lanes to a number of freeway segments in order to provide “managed” lanes. These additional lanes will increase capacity, inducing additional driving and increasing regional VMT and GHG Emissions, as well as PM-10 pollution from tire, brake, and road wear. Conversely, eliminating them will avoid some of these “Unavoidable” impacts and also reduce the GHG emissions attributable to the construction of new lanes.

II. Replace “Managed” lanes with “Transit-only” lanes.

Define “Transit” to include carpools of 3 or more, vanpools, shuttles, and other unconventional multi-passenger vehicles in addition to conventional transit vehicles. Restrict some freeway lanes to use only by transit, with no provision for paid access by non-transit vehicles. This will reduce the relative advantage of solo driving and make transit more attractive, further reducing the VMT, GHG, and PM-10 impacts. The Transit-only lanes should be taken from existing general-purpose or managed lanes, never from new construction.

RESPONSE TO COMMENT 18-1

Thank you again for the Quality of Life Coalition’s participation in the environmental review process and for the detailed comments for SANDAG’s consideration. Please see subsequent responses to specific comments for additional details regarding the Quality of Life Coalition’s concerns, including avoidance of certain significant impacts.

RESPONSE TO COMMENT 18-2

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the proposed Plan. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG’s peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D. Where possible, the proposed Plan proposes repurposing of general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network.

Please also refer to SANDAG’s response to a similar proposed alternative to eliminate all additional freeway lanes in letter 35 (response to comment SOFAR 35-3), and to Master Response 1 regarding alternatives.

RESPONSE TO COMMENT 18-3

Improvements to the freeway system are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and high occupancy vehicle travel. Please also refer to SANDAG’s response to a similar proposed alternative in letter 35 (response to comment SOFAR 35-3), specifically, making all managed lanes transit only.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 18-4
SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Fast and frequent mass transit is the most efficient and sustainable way to move large amounts of people, particularly in our urban corridors that are carrying the largest number of trips the longest distances. These corridors experience the greatest congestion, which is why they have been slated for commuter rail that is much faster and more frequent than the rail service provided in the region today. The type of vehicles and propulsion will be determined during the advanced planning phase of each project.

Please see response to comment Chatten-Brown 34-2 for more information regarding changes to mitigation measure GHG-5b, “Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure,” that will further reduce GHG emissions with, in part, electrified public transit.

RESPONSE TO COMMENT 18-5
The proposed Plan has been updated to reflect 2030 as the start of implementation for the road usage charge to better align with the timing that the State and other regions are expecting to transition to a road usage charge.

RESPONSE TO COMMENT 18-6
SANDAG appreciates the Quality of Life Coalition’s feedback, and we hope the responses above provided some clarification. Please continue to follow along in the environmental process by visiting www.SDForward.com.
RESPONSE TO COMMENT 18-7

SANDAG looks forward to collaborating with local jurisdictions to implement the proposed Plan and support implementation of the local Climate Action Plans.

RESPONSE TO COMMENT 18-8

Land use authority is reserved to local jurisdictions: the cities and the County. The cities and the County are best positioned to effectively implement the objectives outlined in the proposed Plan as those jurisdictions understand the unique needs of their communities and geographies. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed Plan. SANDAG’s Housing Incentive Program will include development of a regional anti-displacement strategy, considering climate change and resilience, consistency with the transportation improvements included in the proposed Plan, and alignment with SANDAG grant programs. No revisions to the Project Description are necessary.
RESPONSE TO COMMENT 18-9
This comment is noted. Figure 2-2, 
Corridor Geographies, has been updated.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 18-10
This comment is noted. Figure 2-2 has been updated.

RESPONSE TO COMMENT 18-11
This comment is noted. “Vacant” denotes land without dwelling units or other structures or land usage type. The land use types and descriptions relevant to the GIS analyses in the proposed Plan and EIR can be found at:

RESPONSE TO COMMENT 18-12
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The land use pattern of the proposed Plan envisions greater compact development in areas served by high frequency, efficient transit. The result is less urban sprawl and greater reductions in GHG emissions. SANDAG has limited authority to “punish” local governments.
RESPONSE TO COMMENT 18-13
The text has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 18-14
The text has been revised as suggested in the Final EIR.
RESPONSE TO COMMENT 18-15

The text has been revised as suggested in the Final EIR; the following text revisions have been made on page 4.4-79:

The management plans can and should be consistent with the SDMMP MSP (SDMMP 2017), be prepared by qualified and experienced ecologists to develop appropriate management and monitoring measures. The management plans should outline management in perpetuity of the mitigation and conservation areas, identify adaptive management measures (Atkinson et al. 2004), outline management goals and objectives, and identify management tasks pursuant to these goals and objectives.

RESPONSE TO COMMENT 18-16

To meet the region’s habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8 of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). As identified in Appendix B of the proposed Plan, SANDAG will continue to monitor the implementation of the Regional Plan on a four-year cycle and make the data accessible to the public. Monitoring would occur two years after adoption of the Regional Plan. Furthermore, SANDAG has committed to monitor the implementation for the Sustainable Communities Strategy on a two-year cycle pursuant to California Assembly Bill 1730 (Gonzalez 2019). Please refer to Master Response 1 for additional discussion regarding including a regional habitat conservation fund.

RESPONSE TO COMMENT 18-17

The text has been revised as suggested. The following text revisions have been made on page 4.4-84:

Permanent, indirect impacts would arise from increased human use of the area and unauthorized trespass, unauthorized trail use, presence of dogs, tree related erosion, direct mortality of species, increased nighttime lighting that may increase predation, increased noise associated with increased traffic volumes, and the increase in exotic species invasion.
of dogs and feral cats, trail-related erosion, direct mortality of species, increased nighttime lighting that may increase predation, increased noise associated with increased traffic volumes, and the increase in exotic species invasion.

RESPONSE TO COMMENT 18-18
Figure 4.4-16 has been revised and the nomenclature in the legend has been corrected.
area is much larger than shown here. Further, the areas of the NC MSCP do not appear to be shown and the red seems like the NHCP of which only Carlsbad has completed its plan. This should be re-done to be clearer in what is actually conserved, PAMA, and in planning areas.

In fact, here is the County map for South County MSCP from https://www.sandiegocounty.ca.gov/sdco/sustainability/csp/SouthMSCP.html These boundaries should be reflected in the DEIR.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 18-19
This has been added per the comment.

RESPONSE TO COMMENT 18-20
The proposed Plan is required to reduce GHG emissions from passenger vehicles and light-duty trucks by 19 percent per capita by 2035 compared to 2005 levels, as mandated by SB 375. Reducing GHG emissions and achieving State goals related to carbon neutrality requires actions at all levels of government. SANDAG looks to support and encourage local jurisdictions, State agencies, and other partners to reduce emissions beyond what is included in the proposed Plan.

SANDAG acknowledges that more work needs to be done in this area and that various climate action plans developed for the region, along with federal and State agency initiatives, are being incorporated as SANDAG’s comprehensive strategies for addressing climate change in this and future regional plans. SANDAG continues to partner with local jurisdictions and other agencies to support the implementation of their specific climate action plans.
RESPONSE TO COMMENT 18-21
SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the Plan. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.

RESPONSE TO COMMENT 18-22
Roughly 75 percent of the transportation network improvements impacts listed in Tables 4.4-7 through 4.4-9 are associated with Complete Corridor projects. However, as discussed in prior responses, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan will be further evaluated and project design and alignments will be refined to minimize impacts on biological resources to the extent practicable. As such, impact values presented in this EIR are subject to change.

RESPONSE TO COMMENT 18-23
The Data Viewer accessible on SDForward.com includes maps of the improvements included in the proposed Plan.

RESPONSE TO COMMENT 18-24
SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the Plan. The activity-based model and other analyses used to inform the proposed Plan have been reviewed through SANDAG’s peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.

RESPONSE TO COMMENT 18-25
Additional lanes included in the proposed Plan directly support Transit Leap; the facilities and enhanced transit service function together as a system. These facilities improve transit operations, including transit priority functions that make transit a compelling alternative to driving.
RESPONSE TO COMMENT 18-26

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals like GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle: the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers.

The study will determine how existing revenues currently fund different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources. The study will assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

SANDAG staff will consult with its Board of Directors, stakeholders, and community members to develop implementation strategies for a road usage charge. This includes policies such as who will pay what and how much, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no group, such as those driving fuel-powered vehicles, low-income individuals, rural residents, or those with long commutes, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 18-27
Please refer to responses to comments Grubb 18-1 and 18-2.

RESPONSE TO COMMENT 18-28
Please refer to the response to comment Grubb 18-3.

Alternative 3

I am suggesting changes to Alternative 3 to avoid some of the significant impacts identified in the DEIR. While the DEIR states that impacts to GHG Emissions and Air Quality are “unavoidable”, that is not correct. Some of these impacts can be avoided or mitigated by changes to the Plan, as described below.

I. Eliminate all addition of freeway lanes.

The Regional Plan proposes to add lanes to a number of freeway segments in order to provide “managed” lanes. These additional lanes will increase capacity, inducing additional driving and increasing regional VMT and GHG Emissions, as well as PM-10 pollution from tire, brake, and road wear. Conversely, eliminating them will avoid some of these “Unavoidable” impacts and also reduce the GHG emissions attributable to the construction of new lanes.

II. Replace “Managed” lanes with “Transit-only” lanes.

Define “Transit” to include carpools of 3 or more, vanpools, shuttles, and other unconventional multi-passenger vehicles in addition to conventional transit vehicles.

Restrict some freeway lanes to use only by transit, with no provision for paid access by non-transit vehicles. This will reduce the relative advantage of solo driving and make transit more attractive, further reducing the VMT, GHG, and PM-10 impacts.

The Transit-only lanes should be taken from existing general-purpose or managed lanes, never from new construction.
III. Add electrified rail transit where increased capacity is needed.

Where additional transportation capacity is needed, as it is in most of the major corridors in the region, provide that capacity in the form of electrified rail transit. For a hundred years we have been adding capacity primarily in the form of roads. That has resulted in an unsustainable pattern of development. That must change starting today. Electric rail transit is the most efficient way to move people and goods, and it is very effective in shaping the pattern of development.

IV. Start charging for road use sooner rather than later.

We are in a climate emergency. We do not have the luxury of waiting until we build a great transit system before we try to reduce driving. We must reduce solo driving immediately and significantly. People who choose to drive should eventually be required to pay the full cost of driving and parking. This can be ramped up over time, but the process needs to start now.

V. Conclusion - Give us an alternative that we can support.

There is much that is good in the Draft Regional Plan, but it does not go far enough or fast enough. The changes described above could provide an alternative that we could all support.

Chapter 7.0 – Other Considerations Required by CEQA
Chapter 8.0 – References
Chapter 9.0 – Preparers of the Environmental Document

Appendices:
Appendix A – Notice of Preparation
Appendix B – Transportation Projects and Phasing Tables (Esparńo)
Appendix C – Climate Change Projections, Impacts, and Adaptation
Appendix D – Air Quality Technical Report

RESPONSE TO COMMENT 18-29
Please refer to the response to comment Grubb 18-4.

RESPONSE TO COMMENT 18-30
Please refer to the response to comment Grubb 18-5.

RESPONSE TO COMMENT 18-31
Please refer to the response to comment Grubb 18-6.
COMMENT LETTER 19: TOSHI ISHIHARA

From: Toshi Ishihara <toshi@ishihara.com>
Sent: Friday, September 17, 2021 11:27 AM
To: Keith Groen <keith.groen@sandiego.org>
Subject: Your EIR presentation during the trans com meeting today

Hi Mr Groen,

I watched your presentation on EIR today. The EIR document on GHG does not have any plots, it has only tables, but your presentation helped me understand the impacts of the RP on our region’s GHG emissions.

I have one question about the GHG plot below.

Question: The 2021 RP will not reduce GHG emissions much after 2035 according to the plot. As you know, California has a 2035 100% EV mandate for passenger cars. How did the SANDAG’s GHG emission model include that mandate?

RESPONSE TO COMMENT 19-1

The comment asserts that “California has a 2035 100% EV mandate for passenger cars” and asks how this “mandate” was included in the GHG emissions projections for the San Diego region reported in the EIR.

In Impacts GHG-1 and GHG-5, the Draft EIR analysis is based on GHG emissions projections from 15 emissions categories, including the on-road transportation and off-road transportation sectors (Draft EIR pages 4.8-19 to 4.8-26; pages 4.8-31 to 4.8-35). The analysis in Impacts GHG-1 and GHG-5 is based on the 2016 GHG Inventory and Projections for the San Diego Region report (Draft EIR Appendix H). This report provides an estimate of 2016 GHG emissions for the San Diego region and GHG projections for the years 2025, 2030, 2035, 2045, and 2050. The 2016 inventory and projections report take into account existing laws, regulations, programs, and policies in effect as of May 2021 to project future GHG emissions out to 2050. The report does not attempt to predict the types of legal, regulatory, policy, economic, technological, and social changes that governments, the private sector, and individuals might make to reduce GHG emissions by 2050. This is because there is substantial uncertainty in projecting future emissions, especially for 2050; in general, the level of uncertainty regarding future emissions increases as the projections get closer to 2050. The 2016 inventory and projections report does not and cannot account for several factors that are unknown at this time but will affect future GHG emissions in the San Diego region, including: future changes in local, State, and federal laws, regulations, and public policy; local, State, national, and global economic conditions; multinational or global agreements; investments and decision-making by private sector actors, including local, national, and global businesses; and personal and group behavior. The Draft EIR analysis is therefore considered conservative and may overstate actual GHG emission trends in future years.

As described in Draft EIR Appendix H, the GHG emissions projections from the on-road transportation sector are based on the CARB Emissions FACtor model (EMFAC2017), which includes the effect of all
key federal and State laws, regulations, and legislative actions that were adopted as of December 2017.

Executive Order N-79-20, which was published on September 23, 2020, establishes, among other things, goals for the State to achieve: 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State will be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. It also directs that CARB, to the extent consistent with State and federal law, shall develop and propose regulations to achieve these goals for passenger cars and trucks and medium- and heavy-duty vehicles, including drayage trucks, and develop strategies to achieve these goals for off-road vehicles and equipment operations in coordination with other State agencies, the U.S. Environmental Protection Agency, and local air districts. When developing these regulations and strategies, CARB is directed to “act consistently with technological feasibility and cost-effectiveness.” It is important to recognize that EO N-79-20, while establishing a goal for 100 percent of in-state sales of new passenger cars and trucks to be zero emissions by 2035, does not mean 100 percent of all cars and trucks operating on the road will be zero emissions.

Regulations to implement this EO have not been adopted, nor have they been developed or proposed. At this time it is not known if such regulations will be adopted, or if they are adopted, how they will be designed and how they will affect the composition of the on-road transportation and off-road transportation vehicle and equipment fleets (i.e., the proportion of zero-emission versus non-zero-emission vehicles) in the San Diego region over time after they go into effect. As a result, their effect on future regional GHG emissions from the on-road transportation sector is not known at this time and is therefore not included in the GHG impact analysis of the Draft EIR.

The comment does not raise any issues with the adequacy of the Draft EIR, and no further response is required.
COMMENT LETTER 20: JACUMBA COMMUNITY SPONSOR GROUP

To: Kristen Uchitel, Associate Planner at SANDAG (kristen.plan@sandag.org)

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR SAN DIEGO FORWARD: THE 2021 REGIONAL PLAN DEVELOPED BY THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)

October 11, 2021

Dear Ms. Uchitel,

Page 1-4 of the DEIR, states “on August 27, 2021, a Notice of Availability (NOA) was published in local newspapers and a Notice of Completion (NOC) was filed with the State Clearinghouse and that copies of the document were placed in public libraries throughout the region.” While a NOA may have been published in newspapers, it is highly doubtful that many San Diegans were reached through that medium. Also, library branches in the rural parts of the county were not provided copies of the document. In fact, it was not until September 7, 2021, that rural community planning/sponsor groups, charged with advising the County about the impacts of projects such as this regional transportation plan (RTP) on their respective communities, received written notification of the public comment period. By then, the 45-day public comment window had been reduced to just 36 days, an inadequate review period for this detailed 1600+ page document. Unlike many other project DEIRs which are often of interest to a specific community, the RTP will impact residents in all areas of the county. Contrary to what is stated on page 2-1, there was no extensive engagement with the public on the development of the DEIR and the general public had no real input into this document. As a minimum, SANDAG should aggressively recirculate the DEIR and extend the public comment period for an additional 45 days, so that county residents have a genuine opportunity to submit their comments.

The San Diego county region which encompasses 4,200 square miles, is geographically diverse, with rural landscapes comprising about two-thirds of the total land area. So, it was disappointing to learn that the draft 2023 RTP only proposes meaningful transportation improvements to the metropolitan areas of the county where Mobility Hubs, including expanded mass transit opportunities will provide a variety of affordable programs and services for urban residents. In fact, the RTP maps do not even identify individual communities east of El Cajon that will be disproportionately impacted by its urban focus. This freedom-restricting plan, in conjunction with other GHG regulatory programs currently under development, like the Climate Action Plan and the Regional Decarbonization Framework, will make it costlier to live in the San Diego Region. Taken together, these plans will impact the personal choices of the county’s low-income residents who will no longer be able to afford to raise their families in rural communities or even drive and park a personal vehicle. Burdensome regulations may also cause residents to relocate to less regulated and expensive counties or states.

After its review of the DEIR, the JCSG provides the following specific comments and questions:

RESPONSE TO COMMENT 20-1

SANDAG initiated the EIR scoping process on November 14, 2016, through the circulation of a NOP. Receipt of the NOP by the State Clearinghouse at the California Office of Planning and Research on November 14, 2016, initiated a 60-day comment period that ended January 13, 2017. The NOP provided formal notification to all federal, State, and local agencies involved with funding, and to other interested organizations and members of the public, that an EIR was to be prepared for the proposed Plan. The NOP was intended to encourage interagency communication concerning the proposed Plan and provide sufficient background information so that agencies, organizations, and individuals could respond to SANDAG with specific comments and questions on the scope and content of this EIR. Appendix A summarizes the issues raised in the NOP comments and identifies the EIR section(s) that address that issue or provides another response to the issue raised as appropriate. The NOP is provided in full in Appendix A-1. The written comments are provided in full in Appendix A-2.

Consistent with CEQA (PRC Section 21083.9), SANDAG noticed and held a public scoping meeting on December 8, 2016, at SANDAG’s office at 401 B Street, San Diego, CA 92101. The purpose was to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a PIP to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan.

The Draft EIR for the proposed Plan was released to the public on August 27, 2021, and was available for a 45-day public review period, as required by CEQA. SANDAG published a Notice of Availability for the
Draft EIR in local newspapers on August 27, 2021, and mailed the Notice to an extensive distribution list. SANDAG also filed a Notice of Completion with the State Clearinghouse to indicate the availability of the Draft EIR for public review and comment on August 27, 2021. The Draft EIR was distributed to the agencies, organizations, and individuals that provided written comments on the Notice of Preparation, the SANDAG Board of Directors, SANDAG member agencies, and other interested parties and stakeholders. Agencies, organizations, and individuals were invited to provide written comments on the Draft EIR during the public review period from August 27 to October 11, 2021. SANDAG’s mail distribution list is open to any subscriber and has been maintained and utilized for e-mail notifications throughout the planning process for the proposed Plan as well as the Draft EIR. SANDAG is unaware of the means through which JCSG received written notification of the public comment period on September 7, 2021. SANDAG’s August 27, 2021 notification of the start of the public comment period was consistent with the requirements of CEQA and does not warrant recirculation.

The Draft EIR and all appendices were available for review online at www.sdforward.com; at SANDAG offices located at 401 B Street, Suite 800, San Diego, California 92101; and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library will facilitate inter-library transfers upon request by a member of the public in order to provide access at local libraries. On a case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with respect to providing access to the Draft EIR during the Public Comment Period.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting discussing adoption of the proposed Plan and certification of the EIR.

RESPONSE TO COMMENT 20-2

The comment addresses the content of the proposed Plan, not EIR adequacy.

The proposed Plan was developed through a data driven planning process. The forecasted development pattern for the proposed Plan SCS is driven by regional goals for sustainability, mobility, housing affordability, and economic prosperity. The SCS land use pattern uses
areas in the region known as Mobility Hubs to concentrate future development. Mobility Hubs are communities with a high concentration of people, destinations, and travel choices. The SCS land use pattern represents a continuing trend in the San Diego region to provide more housing and job opportunities in the existing urbanized areas of the region.

Rural corridors, mostly located along state routes traversing the eastern two-thirds of the region, provide people access to rural towns and lands (including Jacumba), as well as connectivity to the interstate system. Rural corridors are economic lifelines for rural communities and the region’s many tribal nations. Rural corridors provide access to jobs, education, and healthcare, as well as needed infrastructure for the movement of goods, deliveries, and emergency vehicles.

Along I-8 in East County, projects included in the proposed Plan benefit interchanges to this freeway with substantial safety improvements for SR 94, SR 76, and SR 79 and other state routes. Physical safety improvements are realized with a variety of projects including shoulder widening and curve straightening. Our rural and tribal communities also need new investments in broadband infrastructure. This infrastructure is an essential part of the transportation technology envisioned along rural corridors, by providing travelers with real-time travel information and enabling access to Flexible Fleet options such as shuttles and other on-demand transportation services. But it will not only improve mobility along rural corridors; it will enable residents to work remotely, learn online, and conduct other business over the internet.

Technology enhancements such as ATDM, as well as SIS are also aimed at improving safety. These improvements provide people with a variety of benefits, including expediting the movement of goods to rural communities during disaster recovery efforts. Projects related to ATDM will provide motorists with real time roadway conditions, including speeds, roadway visibility conditions, and other tactical information. Smart sensors, closed circuit television cameras, changeable message signs, and traffic detection equipment will all help provide people with a safer environment to walk and bike, while also adding the capability to prioritize the movement of freight or emergency vehicles along a rural corridor.
RESPONSE TO COMMENT 20-3
In response to this comment, Figure 2-1 has been revised to include tribal lands in the San Diego region.
portion of the county. It is also missing several Indian reservations/tribes such as the Campo, Manzanita, etc. Same comment about missing Indian reservations applies to the maps through Figure 2.16. Provide inclusive maps throughout the EIR which identify rural communities as well as Indian reservations.

RESPONSE TO COMMENT 20-4

In addition to complying with SB 375, SANDAG’s regional transportation planning efforts must also comply with CFR Section 450.324(a), which requires that “The metropolitan transportation planning process shall include the development of a transportation plan addressing no less than a 20-year planning horizon as of the effective date. In formulating the transportation plan, the MPO shall consider factors described in § 450.306 as the factors relate to a minimum 20-year forecast period. In nonattainment and maintenance areas, the effective date of the transportation plan shall be the date of a conformity determination issued by the FHWA and the FTA. In attainment areas, the effective date of the transportation plan shall be its date of adoption by the MPO.” SANDAG has projected out to 2050 in its 2011, 2015, and 2021 regional transportation planning efforts. The Regional Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 20-5

The population numbers have been reviewed for consistency and have been confirmed to be accurate. Expected growth of 0.4 or 0.3 percent per year as stated on page 2-8 does not conflict with the population forecasts presented in Table 2-1.

RESPONSE TO COMMENT 20-6

SANDAG is currently developing a housing incentive program. This program will fund local plan updates and increasing affordable housing in transit-rich areas with infrastructure, services, and jobs. Please see Appendix B: Implementation Actions of the proposed Plan for more details.

RESPONSE TO COMMENT 20-7

Table 2-8 in Chapter 2, Project Description, of the Draft EIR, is not establishing baseline conditions, but rather GHG reduction targets established by SB 375. As stated on page 2-38, “In accordance with SB 375, the proposed Plan must include an SCS that demonstrates that the San Diego region will reduce GHG emissions (GHG emissions for SB 375 compliance are calculated using carbon dioxide [CO₂] emissions) from automobiles and light-duty trucks to achieve, if there is a feasible way to do so, the GHG emission reduction targets approved by CARB. Targets are expressed as percent change in per capita GHG emissions relative to
Appendix P. Response to Comments on the Draft EIR

2005. Consistent with the targets established by CARB, the targets for the San Diego region are a 15 percent per capita reduction in passenger vehicle GHG emissions by 2020 and a 19 percent per capita reduction by 2035. The proposed Plan would exceed the GHG emission reduction targets for 2020 and 2035 established by CARB, as shown in Table 2-8."

Regarding the use of 2016 as the baseline, the proposed Final Plan is unique, as it was developed over 6 years rather than 4 years. In October 2019, AB 1730 (Gonzalez) was signed into law, authorizing a 2-year extension for the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the San Diego region and deeming the 2015 Regional Plan, its SCS, and Final EIR valid for State compliance, funding eligibility, and other purposes through 2021. Due to this extended timeframe, the proposed Plan has a baseline of 2016, which is two years older than would be typical in past Regional Plan EIRs. In general, physical conditions as they existed in 2016 were used as the baseline for the impact analysis of the proposed Final EIR, corresponding with the release of the NOP on November 14, 2016 and the start of EIR preparation. This is the case for the GHG emissions baseline data used for analysis in the proposed Final EIR.

**RESPONSE TO COMMENT 20-8**

The proposed Plan maximizes our existing roads using technology to manage how lanes are used, which reduces traffic congestion and delay. The proposed network of Managed Lanes also encourages carpooling, vanpooling, and taking transit, which creates more roadway capacity without adding additional lanes. This model is very similar to how the I-15 Express Lanes operate today.

The Managed Lanes concept is envisioned in the proposed Plan, providing a system that gives the opportunity to dynamically manage the lanes based on real time conditions, time of day, and vehicle occupancy, to make all lanes more efficient and provide benefits to the system as a whole.

It is also important to recognize that State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). These bold changes are necessary to address unprecedented challenges facing our region, and state. SANDAG understands the near-term need for congestion relief and is
working to find near-term ways to implement flexible fleet pilot projects and expand service and frequency of public transportation.

**RESPONSE TO COMMENT 20-9**

The proposed Plan includes managed lanes on Interstate 8 between I-5 and Greenfield Drive east of El Cajon and, as indicated in Figure 2-25 and Figure 2-30, the proposed Plan includes rural corridor technology and operational improvements from Greenfield Drive to the Imperial County line. The rural corridor improvements would include curve realignments or straightenings, shoulder widenings, intersection improvements, and other safety improvements.

**RESPONSE TO COMMENT 20-10**

In terms of the air regulations in California, regardless of their registration and plate, any truck operating in the state is subject to California in-use regulations (e.g., truck and bus rule, smoke opacity requirements, and CARB’s drayage truck rule). For example, each vehicle operating in California, including those in transit from Mexico, Canada, or any other state, must have a label, called an Emission Control Label, showing that the engine met the required federal emission standards applicable for the model year of the engine (see regulation at https://ww2.arb.ca.gov/resources/documents/heavy-duty-diesel-emission-control-label-ecl-inspection-program-regulation). Even if these trucks are exchanging cargo near California-Mexico border with another truck, they are still subject to CARB’s regulations, including the Drayage Truck Rule.

Relevant federal and State regulations are discussed in Appendix Y of the proposed Plan.

Additionally, the Plan includes numerous projects to improve mobility at the border by reducing truck queuing, reducing congestion, and thereby reducing idling emissions.

No changes to the analysis are required.

**RESPONSE TO COMMENT 20-11**

Figure 2-30 is not intended to be a comprehensive map of all rural roadways, but rather Rural Corridors. Rural Corridors provide rural towns and lands access and connectivity to the interstate system. Highway 80 and SR 1, as “alternate routes,” are not Rural Corridors.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 20-12

The comment only addresses the data used to prepare the proposed Plan, not the EIR.

SANDAG developed the proposed Plan and the proposed transportation network based on a data driven process—analyzing where people live and work, how they get around, what transportation infrastructure exists, what is needed to serve future growth, and more. This data included census data and cellphone based data. SANDAG did not rely on data alone; the proposed Plan reflects the views of real residents from around the region, the professional judgments of a number of planning professionals at the agency, and extensive knowledge of diverse communities across our region. Appendix T of the proposed Plan includes the detailed methodology for network development and performance of the Plan related to improved access to basic needs (retail, parks, and medical), employment centers, and higher education.

RESPONSE TO COMMENT 20-13

The coverage area of each regional Mobility Hub represents a general area defined through a propensity analysis (detailed in Appendix T of the proposed Plan). The Mobility Hubs depict a framework that will be used to guide future collaborative planning efforts between SANDAG and local jurisdictions. In reviewing the County of San Diego’s suggestions received through the proposed Plan comment period, SANDAG agrees that the areas identified, including Lakeside and Spring Valley, are appropriate to consider in future Mobility Hub planning. The areas identified also align with Transit Priority Areas. In the proposed Plan, Mobility Hub maps also reflect Transit Priority Areas to be more inclusive of these areas.

RESPONSE TO COMMENT 20-14

The comment only addresses the content of the proposed Plan, not the EIR.

The proposed Plan aims to improve access to a quality public transportation system for all San Diego residents, especially for seniors and other disadvantaged populations. These improvements include transit fare subsidies and on-demand Flexible Fleet services that are accessible to seniors. The proposed Plan projects a growth in senior access to parks and recreational facilities via walking, biking, and transit (see Appendix H of the proposed Plan for more information).
every metric, senior access to transit, retail, medical facilities, and parks improves through 2025 and 2050.

SANDAG has a long history of working closely with senior community members, social service providers, non-profits, and community-based organizations to develop and fund specialized transportation services geared specifically towards the needs of seniors. The proposed Plan network includes a variety of modes that work together seamlessly to provide all San Diego residents, regardless of age or ability, access to multiple travel choices. Flexible Fleets are an example of an option that is particularly well suited for the senior population. Flexible Fleets options like ridehail, rideshare, and microtransit offer a range of mobility options and vehicles that can accommodate many types of trips and meet the needs of various users. They can make it easy for seniors to access medical appointments and other basic needs without relying on a car. Flexible Fleet vehicles and services are adaptable in nature and can offer personalized accommodations, such as wheelchair lifts, door-to-door services, and other options for people with physical limitations. SANDAG has conducted outreach and will continue to engage with seniors to ensure their mobility needs are met. In addition, SANDAG is developing a Flexible Fleets Implementation Strategic Plan that will address potential barriers to accessing Flexible Fleets, ensuring options for people without smartphones or internet, providing education about how to access Flexible Fleets, and more.

RESPONSE TO COMMENT 20-15

Table 2-13 includes costs for proposed programs of the proposed Plan. Specific funding sources have not been identified for each program; however, proposed Plan Appendix V, Funding and Revenues includes Table V.1 that shows eligible uses (including programs) for the various funding sources.

The comment incorrectly identifies a funding shortfall of $73 billion. The proposed Plan is revenue constrained, as required by 23 CFR 450.324 (f) and the California Transportation Commission Regional Transportation Plan Guidelines for Metropolitan Planning Organizations (2017). In the proposed Plan, revenues total $172 billion and costs total $163 billion in 2020 dollars.
RESPONSE TO COMMENT 20-16
The implementation actions identified on page 2-72 of the Draft EIR are not listed in order of priority. Funding sources for the proposed Plan are detailed in proposed Final Plan Appendix V.

RESPONSE TO COMMENT 20-17
As discussed in Chapter 4, physical conditions as they existed in 2016 are used as the baseline for the impact analysis of the EIR. The 2016 base year for the air quality analysis is the same as the 2016 year used in other technical sections, such as Greenhouse Gas Emissions (Section 4.6) and Transportation (Section 4.16). As shown in Table 4.3-3, ambient air quality in recent years is generally similar to 2016 data. Moreover, as discussed in Section 4.16.1, differences in traffic conditions between 2016 and current conditions (2021) are minor, and the change does not affect findings in the transportation analysis. Similarly, for air quality, changes between 2016 and current conditions are minor, and changing the baseline would not affect the overall findings of the air quality analysis.

No changes to the analysis are required.

RESPONSE TO COMMENT 20-18
There are no measures in the proposed Plan that would curtail or eliminate residential wood burning and natural gas combustion. SDAPCD regulates stationary and area source emissions as part of its air quality responsibility, and develops rules and regulations to ensure federal and State air quality standards are met. SDAPCD periodically revisits and amends its rulebook as part of the State Implementation Plan (SIP) process. Regardless, no mitigation like this is proposed in the EIR, and no changes to analysis are required.

RESPONSE TO COMMENT 20-19
The energy consumption shown in Table 4.6-1 is based on the energy consumption projections used in the GHG inventory (Appendix X of the proposed Plan), which are based on the CEC Energy Demand 2020–2030 Revised Forecast. The CEC forecasts discussed in Section 4.6, Energy, and Chapter 5, Cumulative Impact Analysis, indicate an increase in energy demand between 2020 and 2030. Appendix O of the EIR provides information to support the alternatives analysis, but does not include information related to electricity or energy demand.

No changes to the EIR analysis are required.
response to comment 20-20

The proposed Plan supports the electrification of the region's transit buses and the State's Innovative Clean Transit regulation. Appendices A and B of the Plan include SANDAG's proposed commitment of $75 million through 2025, $250 million between 2026 and 2035, and $332 million between 2036 and 2050 for zero-emission buses and infrastructure to accelerate the implementation of MTS' and NCTD's Zero Emission Bus (ZEB) Rollout Plans. Transit agency ZEB Rollout Plans are on the CARB website here: https://www2.arb.ca.gov/our-work/programs/innovative-clean-transit/ict-rollout-plans. As discussed in the Rollout Plans, appropriate charging infrastructure will be installed on site to accommodate and support bus capacity. MTS and NCTD will consider forecasted passenger usage, among other factors, when making decisions regarding bus sizes prior to purchase of vehicles.

The MTS transition to zero-emissions vehicles is detailed in its transition plan. The transition plan takes into account daily mileage requirements and charging needs. See the transition plan here: https://www.sdmts.com/sites/default/files/attachments/mts_fleet_transit_plan_final_092220_reduced.pdf. School buses are not part of MTS transition plan, but CARB has budgeted for 1,000 zero-emission school buses in its 2021–2022 budget.

No changes to the Draft EIR analysis are required.

response to comment 20-21

This comment does not pertain to EIR adequacy. As shown in Tables 4.6-17 through 4.6-19, while overall VMT is expected to increase relative to 2016 conditions, VMT on a per capita basis is reduced 14.1 percent by 2050, consistent with the objectives of the EIR.

response to comment 20-22

Mitigation measure AQ-3b allows for the use of propane or natural gas generators when grid power is not available, which includes the rural areas. No changes to the EIR analysis are required.

response to comment 20-23

For ease of reference, electronic documents have been updated to link all figure references to the appropriate figure upon selecting the associated reference.
RESPONSE TO COMMENT 20-24
Figure 4.4-7 has been updated as requested to include the tricolored blackbird and golden eagle in the Final EIR.

RESPONSE TO COMMENT 20-25
The EIR relies on available data sources. All sensitive species from the data sources referenced in the EIR are included in Figure 4.4-7, and tricolored blackbird and golden eagle points were added to the figure in the Final EIR.

RESPONSE TO COMMENT 20-26
As stated in Chapter 4 of the EIR, SANDAG is required to update the Regional Plan every 4 years, in collaboration with the 18 cities and County of San Diego, along with regional, State, and federal partners. The proposed Plan is unique, as it was developed over 6 years rather than 4 years. In October 2019, AB 1730 (Gonzalez) was signed into law, authorizing a 2-year extension for the RTP/SCS for the San Diego region and deeming the 2015 Regional Plan, its SCS, and Final EIR valid for State compliance, funding eligibility, and other purposes through 2021. Due to this extended timeframe, the proposed Plan has a baseline of 2016, which is 2 years older than would be typical in past Regional Plan EIRs. In general, physical conditions as they existed in 2016 are used as the baseline for the impact analysis of this EIR, corresponding with the release of the NOP on November 14, 2016, and the start of EIR preparation. As such, no changes have been made to Table 4.8-4.

RESPONSE TO COMMENT 20-27
The comment asserts that the reference in Draft EIR Table 4.8-12 referring to the 2050 reference point as 80 percent below 2016 levels is inconsistent with other, unspecified references to the 2050 reference point as 80 percent below 1990 emissions levels.

Under Impact GHG-5 the Draft EIR evaluates whether the proposed Plan is inconsistent with the State’s ability to achieve the EO S-3-05 goal of reducing California’s GHG emissions to 80 percent below 1990 levels by 2050. To perform this analysis, the Draft EIR estimated an emissions reduction reference point for the region for 2050, based on EO S-3-05. Because there is not an available 1990 emissions inventory for the San Diego region that is comparable to the regional inventory and projections prepared for the proposed Plan, a reference point was developed for this analysis to show the level of GHG reductions needed between 2016 (the baseline year of the inventory and proposed Plan).
and 2050 that would be equivalent to the level of reductions needed when measured against 1990.

In 2016, total statewide emissions equaled 429 MMTCO$_2$, which was 2 MMTCO$_2$ (less than 1 percent) lower than the statewide 1990 emissions level of 431 MMTCO$_2$ (CARB 2018d). Because total statewide emissions in 2016 were essentially equal to the statewide 1990 level, for purposes of this analysis, total regional emissions in 2016 are assumed to be representative of total regional emissions in 1990. Therefore, to identify the reference point for 2050, an 80 percent reduction was applied to the total regional emissions in 2016.

This comment does not relate to the adequacy of the Draft EIR and no further response is required.

**RESPONSE TO COMMENT 20-28**

This comment addresses two of the measures included in Draft EIR mitigation measure GHG-5f that the County of San Diego and cities can and should implement to reduce VMT from development projects. Specifically, the comment asks for clarification on the difference between low stress bicycle networks and bicycle corridors; regarding the measure to implement school bus programs in areas not served by school buses, the comment requests that SANDAG identify areas where school bus programs are “needed based on geographical need and not a social equity ‘want’.”

Low stress bicycle networks refer to bicycle facilities like trails, paths, or lanes in which the user experiences a low amount of stress due to factors such as low vehicle speed, low vehicle volumes, and physical separation from vehicle traffic. Implementing a school bus program in areas not served by school bus service is included in mitigation measure GHG-5f because school bus service can reduce VMT and associated GHG emissions when students travel to and from school in a bus instead of in passenger cars and trucks. The request for SANDAG to identify areas with a geographic need for school bus service is noted but not required by CEQA. However, this comment is noted for the record and will be forwarded to the SANDAG Board of Directors for its consideration prior to making a decision on adoption of the proposed Plan.

**RESPONSE TO COMMENT 20-29**

Edits have been made to Figure 4.9-2 to include rural communities.
For the San Diego region, population is expected to grow by nearly 437,000 people from 2016 to 2050. Prior forecasts projected more people in the San Diego region. The Series 14 Regional Growth Forecast includes assumptions of housing unit production that results in a subregional forecast that includes population decline or lower population growth in certain areas in the region. These housing assumptions, described in proposed Plan Appendix F, include an increase in the region’s vacancy rate to 4% by 2040, an accounting of vacation rentals and second homes as “unoccupiable,” and a decrease in household size from 2.75 persons per household in 2016 to 2.62 persons per household by 2036.

Forecasted job growth in the region is a result of the size and age/race/ethnicity/sex composition of the projected population as well as higher projected labor force participation rates in the future. The region is expected to grow by 440,000 jobs by 2050. Future jobs are allocated to existing employment centers and scheduled commercial development. To clarify, the quoted statement is intended to indicate that for the growth that would occur within the unincorporated areas (0.9 percent), that growth would be focused within existing rural communities, rather than in unincorporated areas that are not part of rural communities. It is acknowledged that VMT restrictions and fees encourage growth in urban areas and discourages growth in unincorporated areas.

**RESPONSE TO COMMENT 20-31**

Table 4.15-2 in the Final EIR has been updated in response to this comment to include additional County fire service providers, specifically, Campo Reservation Fire Protection District and Boulevard. The other two fire stations referenced are CAL FIRE stations and were already accounted for.

**RESPONSE TO COMMENT 20-32**

The percentage of waste reduction associated with the measures outlined in mitigation measure U-2b would be based on State legislation and local regulations. A specific percentage cannot be applied to each measure due to waste reduction policy variations across the various jurisdictions in the county and potential future regulatory updates at
the State level; however, a reference to State and local requirements has been added to the measure to ensure the goals established are achieved.

**RESPONSE TO COMMENT 20-33**

Experience and research have demonstrated that expanding roadways ultimately leads to more traffic and GHG emissions. For example, in the Houston area, a 26-lane, $2.8 billion mega-freeway project was built to alleviate traffic congestion. Within a few years after construction was completed, congestion worsened and travel times increased 30 percent during the morning commute and 55 percent during the evening commute. The proposed Plan maximizes our existing roads using technology to manage how lanes are used, which reduces traffic congestion and delay. The proposed network of Managed Lanes also encourages carpooling, vanpooling, and taking transit, which creates more roadway capacity without adding additional lanes.

The TransNet measure approved by San Diego County voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. The remaining projects in the TransNet measure may not be constructed due to changes in regional needs, changes in State law, and technology advancements that would suggest a different transportation solution. The SANDAG Board of Directors may review the TransNet ordinance and discuss possible updates. This process is outside of the development of the proposed Plan.

**RESPONSE TO COMMENT 20-34**

Due to data/survey availability, ABM2+ largely relies on pre-pandemic survey (2016/17 household behavior, 2019 SB1 TNC, and 2015 transit onboard surveys); therefore, the pandemic impacts on behaviors such as transit/carpool usage and auto ownership are not reflected in ABM2+. Based on information from the National Household Travel Survey, California Household Travel Survey, 2016/17 Household Behavior Survey, and the ACS, SANDAG developed a telework trend to project future telework rates. Researchers from the Institute of Transportation Studies at UC Irvine reviewed and confirmed the telework assumptions used in proposed Plan.

SANDAG has a plan to update ABM2+ to ABM3 to reflect the “new normal” travel behaviors, once surveys conducted in a new normal year become available. The new normal condition is important for
creating a long-range planning model. It is unclear at this moment, when and if the new normal has arrived.

RESPONSE TO COMMENT 20-35
Please see response to comment JCSG 20-26 for rationale regarding the use of a 2016 baseline.

The performance of the proposed Plan is based on the best available data at this time. It will be important to continue to monitor trends and impacts on travel behavior as the Regional Plan is implemented and updated in the future. Priority Implementation Action 10 is to advance a data science program to better understand travel behavior in the region, update travel demand modeling tools, and improve transparency and reporting on program effectiveness and project delivery.
Appendix P.1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 20-36

Build out of the Regional Bike Network along with investments in Complete Streets and Vision Zero programs are components of the proposed Plan that advance goals related to reducing GHG emissions, improving safety for all users, and advancing public health. SANDAG is unaware of any study indicating that it is either safe or effective to add bicycle lanes to freeway shoulders.

RESPONSE TO COMMENT 20-37

Figure 4.11-3 in the Land Use section of the EIR identifies the military installations in the San Diego region. Table 4.14-6 identifies the potential loss of land uses with implementation of the proposed Plan (including a 500-foot buffer to provide a conservative estimate of impact). The potential impact on military lands that may occur with permanent ROW acquisitions from the proposed transportation projects would be addressed at the project-specific level of environmental analysis. As discussed in Appendix B of the proposed Plan, SANDAG is collaborating directly with Military Community Planning Liaison Officers to identify challenges, opportunities, and priority projects that support mission readiness and the region’s transportation priorities.

RESPONSE TO COMMENT 20-38

As discussed in detail in mitigation measure GHG-5d in Section 4.8, SANDAG will adopt a Regional Digital Equity Strategy and Action Plan that identifies and addresses gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). SANDAG will also participate in federal and State processes to support projects that increase access to broadband infrastructure, as well as pursue federal, State, and private partnerships to leverage additional dollars for these programs.

RESPONSE TO COMMENT 20-39

Please note that the Parking Strategies for Smart Growth guide is referenced on page 4.16-13 of the Draft EIR.

SANDAG developed a Parking Strategies for Smart Growth guide as part of their Planning Tools for the San Diego Region (SANDAG 2010a). This guide provides a benchmark and compares the various parking regulations within the region, as well as how those regulations compare to national standards. Additionally, the guide provides example policies
on how jurisdictions can implement smart growth parking policies and programs. SANDAG also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals.

**RESPONSE TO COMMENT 20-40**

This comment asserts that the per capita regional GHG reduction targets for passenger vehicles for 2020 and 2035 established for SANDAG by CARB “do not appear to align with the RTP’s GHG reduction goals,” which the commenter refers to as “80 percent below 1990 levels” by referencing Draft EIR page 4.16-45.

To clarify, Draft EIR page 4.16-45 is referring to the statewide goal established in EO S-3-05 for reducing GHG emissions from all emissions sectors in California to 80 percent below 1990 levels by 2050. The proposed Plan does not establish a reduction goal of reducing total regional emissions in the San Diego region to 80 percent below 1990 levels by 2050. The Draft EIR does provide an analysis of whether the proposed Plan would be inconsistent with the State’s ability to achieve the EO S-3-05 target of reducing emissions to 80 percent below 1990 levels by 2050 (Impact GHG-5, pages 4.8-31 to 4.8-35).

The proposed Plan is required by State law to include an SCS that will achieve the 2035 per capita regional GHG reduction targets for passenger vehicles, if it is feasible to do so. GHG reductions under SB 375 apply only to certain classes of passenger vehicles, are measured against a 2005 baseline, and are measured on a per capita basis. For these reasons GHG reductions required under SB 375 are not directly comparable to the statewide GHG reductions goals set forth in EO S-3-05.

**RESPONSE TO COMMENT 20-41**

Managed Lane investments are focused on making carpooling, vanpooling, and transit more time competitive with driving by ensuring these driving alternatives can use Managed Lanes to bypass congestion in general purpose lanes. Solo drivers who pay a fee will also have the opportunity to bypass traffic congestion. Conversion of general purpose lanes to create additional Managed/HOV lanes would be governed by federal and State laws and regulations. Increasing non-drive alone
travel choices such as carpooling/vanpooling and bicycle facilities is also important to the overall goal of reducing GHG emissions and VMT.

RESPONSE TO COMMENT 20-42
The performance of the proposed Plan is based on the best available data at this time. It will be important to continue to monitor trends and impacts on travel behavior as the Regional Plan is implemented and updated in the future. The proposed Plan's Priority Implementation Action 10 is to advance a data science program to better understand travel behavior in the region, update travel demand modeling tools, and improve transparency and reporting on program effectiveness and project delivery.
RESPONSE TO COMMENT 20-43

The data presented in this table are modeled results from SANDAG’s Activity Based Model (ABM). This model can take into account several factors such as travel distance, speed, and network availability. The ABM is updated regularly with the latest available data and best practices to represent regional travel; please see Appendix S, Travel Demand Modeling Tools, of the proposed Plan for more information.

Regarding the assertion that VMT predictions past 2035 are educated guesses, the ABM is a state-of-the-art tool for analyzing the transportation network, land use pattern, and other policies of the proposed Plan; however, it is based on the information we know today. There are many emerging technologies and future behavior changes that could impact mode shift in the future. SANDAG will continue to use best available data and research on mobility to inform future updates of the ABM and estimated performance of the proposed Plan.

Please see response to comment JCSG 20-7 regarding the use of 2016 for the baseline year.

RESPONSE TO COMMENT 20-44

Page 5-65 of the Draft EIR references the total number of privately owned vehicles, including trucks, crossing the border, while page 2-49 references just trucks. These numbers are not conflicting, and no change has been made.

RESPONSE TO COMMENT 20-45

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

Rural corridors, mostly located along state routes traversing the eastern two-thirds of the region, provide people access to rural towns and lands (including Jacumba), as well as connectivity to the interstate system. Rural corridors are economic lifelines for rural communities and the region’s many tribal nations. Rural corridors provide access to jobs, education, and healthcare, as well as needed infrastructure for the movement of goods, deliveries, and emergency vehicles.

Along I-8 in East County, projects included in the proposed Plan benefit interchanges to this freeway with substantial safety improvements for SR 94, SR 76, and SR 79 and other state routes. Physical safety improvements are realized with a variety of projects including shoulder widening and curve straightening. Rural and tribal communities also
need new investments in broadband infrastructure. This infrastructure is an essential part of the transportation technology envisioned along rural corridors, by providing travelers with real-time travel information and enabling access to Flexible Fleet options such as shuttles and other on-demand transportation services. But it will not only improve mobility along rural corridors; it will enable residents to work remotely, learn online, and conduct other business over the internet.

Technology enhancements such as ATDM, as well as SIS, are also aimed at improving safety. These improvements provide people with a variety of benefits, including expediting the movement of goods to rural communities during disaster recovery efforts. Projects related to ATDM will provide motorists with real time roadway conditions, including speeds, roadway visibility conditions, and other tactical information. Smart sensors, closed circuit television cameras, changeable message signs, and traffic detection equipment will all help provide people with a safer environment to walk and bike, while also adding the capability to prioritize the movement of freight or emergency vehicles along a rural corridor.

Next year, SANDAG will study usage-based fees and the effect the fees will have on meeting established goals like GHG emissions reduction and improving equity for different income levels and different populations. The first phase of the study will calculate the true cost of driving a vehicle: the cost to own and operate a vehicle, the effect on road wear and tear, the cost of increasing capacity of the transportation system to meet demand, local and global pollution caused by both fuel powered and electric vehicles, traffic accidents, traffic congestion, and the cost of delays caused by congestion to the economy and to the quality of life of travelers. The study will determine how existing revenues currently fund different parts of the transportation system and how different populations are impacted. This foundational understanding will help SANDAG design a road usage charge program that encapsulates multiple factors to make it more fair across the community than the current transportation funding sources.

The study will assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will consult with its Board of Directors, stakeholders, and community members to develop implementation strategies for a road usage charge. This includes policies such as who will pay what and how much, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed
program that will ensure that no group, such as those driving fuel-powered vehicles, low-income individuals, rural residents, or those with long commutes, are paying more than their fair share. There are multiple mechanisms, such as caps and rebates, that will be explored to ensure a fair system.

The road usage charge, which is being studied by both the federal and State governments, is being considered to replace an old tax system that is no longer relevant. We know this is a challenge and we respect the concerns raised. We are committed to having authentic dialogues to work through the challenges and create a revenue system that is flexible, sustainable, equitable, and fair to all.

The proposed Plan is revenue constrained, as required by 23 CFR 450.324 (f) and the California Transportation Commission Regional Transportation Plan Guidelines for Metropolitan Planning Organizations (2017). Funding sources for the proposed Plan are detailed in Appendix V of the Plan.

**RESPONSE TO COMMENT 20-46**

This comment addresses the proposed Plan and is not related to EIR adequacy.

The proposed Plan is unique, as it was developed over 6 years rather than 4 years. In October 2019, AB 1730 (Gonzalez) was signed into law, authorizing a 2-year extension for the RTP/SCS for the San Diego region and deeming the 2015 Regional Plan, its SCS, and Final EIR valid for State compliance, funding eligibility, and other purposes through 2021. Due to this extended timeframe, the proposed Plan has a baseline of 2016, which is 2 years older than would be typical in past Regional Plan EIRs. The COVID-19 pandemic is very recent phenomenon that fell in the middle of the planning efforts related to the proposed Plan. The long-term effects of the pandemic on the region, specifically related to transportation, have yet to fully emerge. SANDAG is mandated by State law (AB 1730) to adopt the current iteration of its RTP/SCS by December 31, 2021. However, as noted under response to comment JCSG 20-43, the Regional Plan and its SCS are iterative planning documents that are typically updated every four years to account for new data, analysis, policy, and experience. The longer-term effects of the pandemic will be taken into account during the subsequent iterations of the Regional Plan.
RESPONSE TO COMMENT 20-47
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

RESPONSE TO COMMENT 20-48
This comment accurately cites language in the Draft EIR stating that achieving GHG reductions “at the scale required would require major changes to government regulation, private sector activity, consumer behavior, and other facets of life...” However, it incorrectly implies that the proposed Plan outcome should guarantee that local temperatures and sea levels would not rise. The basic purposes of CEQA are to inform government decision makers and the public about potential significant environmental impacts of projects, identify ways the impacts can be reduced or avoided, prevent significant avoidable environmental damage through alternatives and mitigation, and disclose to the public the reason that decision makers approved a project that may result in unavoidable significant impacts. The lead agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the project approval. The Draft EIR accomplishes the basic purposes of CEQA, and the SANDAG Board of Directors will consider the information in making its decision on the Plan.
RESPONSE TO COMMENT 20-49

JCSG’s support for the No Project Alternative is acknowledged and will be considered during the final decision-making process.
RESPONSE TO COMMENT 20-50

Thank you for including a copy of JCSG’s comments on the proposed Plan. For detailed responses to these comments, please refer to responses beginning on L217 in Appendix P.2.

Appendix P1. Response to Comments on the Draft EIR
impacts our region and mass transit shuts down for public safety reasons? Clearly more studies on the current trends in mass transit usage must be analyzed before the predictions contained in this plan can be validated. Also, additional studies on post-COVID mass transit usage figures are critical. Analysts should avoid using the data from any month when all mass transit ridership fares have been waived, as they will skew the data. (This will happen in September 2021.)

On page 25, the 2021 plan calls for providing a variety of transit riders with reduced fares (seniors, low-income, students, youth and the disabled). This is fiscally untenable. What is the actual cost per passenger mile on a bus, trolley, or light rail? Appendix A predicts that in 2020 dollars, transit fare subsidies in 2035 will be $982 million dollars and in 2050, subsidies will be $4 BILLION dollars which means that the answer to the previous question about the cost per passenger mile must be too high to print. This plan cannot seriously contemplate spending $4 billion dollars to possibly achieve a 13 percent increase in mass transit ridership.

The 2021 plan which seeks to "reimagine" regional transportation strategies appears to be a huge and costly wish list of programs and government regulations directed primarily at changing residents' driving behavior at a tremendous loss of personal freedoms. It envisions spending millions of dollars to create an expanded bike network with corridors by 2050. Again, where is the data that shows that kind of expenditure will get more people out of their cars and onto bicycles? A recent case in point: the removal of 400 parking spaces along the business district on 30th Street in the North Park area so that bike lanes, that are rarely used to commuting to and from work, could be installed. Not only are the merchants upset about the loss of customer parking and business, but delivery trucks are now blocking bikes lanes to make their deliveries and handicapped parking has become confusing for those who need it. The 2021 plan will greatly expand on that unpopular and costly transportation strategy.

Under this plan, transportation in and around mobility hubs or areas of concentrated development (cits) would be highly regulated with curb management regulations/fees based on the time of day parking rates, and ride-hailing opportunities. Ride-hailing at mobility hubs is described as offering people on-demand vehicles for short and long-distance trips, possibly subscription-based services which would "allow people to reserve a vehicle that best serves the needs of their trip." So, it is okay to rent a vehicle but just not to personally own a vehicle?

On page 32, the plan states: "In the San Diego region, almost half of all trips are three miles or less, and most everyday trips are made within neighborhoods using local streets." Where is the data to back up this statement? This page also states: "On average, one person is killed or seriously injured in traffic violence everyday in the region." Everyone understands the safety risks that they take when they drive a car and they believe those risks to be acceptable. Again, no driving statistics are referenced, and of course, the plan does not provide data on the numbers of people who are mugged walking down the region's streets or at trolley stations, etc.

Everyone agrees that climate change is real. On page 34, several climate strategies are listed. The blue pie chart at the top of the page lists "collecting rainwater" as one viable climate mitigation strategy. Why doesn't this 2021 plan identify more impactful strategies such as building new reservoirs/expanding existing ones or building additional desalination plants? It should be noted, that even if the 2021 plan is implemented, it will not stop the sea levels from rising.
This plan would require employers and developers to provide transportation benefits and on-site amenities to encourage people to use sustainable transportation choices. Does the County want even more businesses to flee California for a friendlier business climate? Employers can figure out how to use flexible work schedules and tele-work options to attract and sustain their workforce without unnecessary government intervention/regulation.

Of course, the 2021 plan’s proposed transportation management “strategies” come at a huge cost ($163 billion dollars). The plan identifies $90 billion dollars that will come from local funding sources: sales taxes, impact fees, fuel taxes, roads tolls, increased passenger fares, general funds, housing revenue, ride-hailing fees, value pricing, and road user charges also called vehicle miles travelled (VMT). Road usage fees or VMT, which have yet to be implemented through legislation, are needed to offset the reduction in gasoline taxes as more electric vehicles (EV) use our roadways. Under this plan, VMT fees would come on top of the existing federal, state, and local gasoline taxes, and they would unfairly penalize the drivers of gas-powered vehicles, who frequently are low-income and minority residents who live in the rural areas of the County. VMT fees would not be collected on out-of-state vehicles. Under the 2021 plan, fees of all kinds would be raised, including variable road tolls based on the time of day (congestion); fees for solo drivers using carpools lanes, and fees for ride-sharing services like Uber. The fees and regulations imposed by this plan will disproportionately impact low-income residents, while the plan claims to promote social equity. They are the ones who will not be able to afford to park/drive their own private vehicles while private transportation choices of more affluent residents will not be affected.

Figure 3.3 on page 50 shows the 2021 Regional Plan Expenditures with an estimated total of $163 billion in 2020 dollars. There needs to be a similar pie chart within the 2021 plan that shows how much money will be spent on each transportation category: Transit leap (mass transit), mobility hubs, complete corridors, bicycle network, highway improvements etc. Although there may be appendices that list all the funding for a specific category, it is unlikely that most people will wade through all of them to find that important information.

On page 53 of the 2021 Regional plan is a list of a priority implementation actions. Number 1 on the list is “Apply the Social Equity Planning Framework.” Number 10 on this list is “Advance a data science program to better understand travel behavior in the region.” These priorities should be reversed. You can’t apply a framework or develop a meaningful plan until there is solid and recent (post COVID) transportation data.

This very expensive “Lamborghini” transportation plan with its “woke” statements about social equity and its claims to “strengthen a sense of place,” is a direct assault on the personal transportation choices of San Diego County residents. County leaders must choose a less expensive “Toyota” plan that will not transform “America’s Finest City” into a third-rate economy where only the wealthy residents can still afford to own and drive a car.

Chery Diefenbach
Chair, Jacaranda Community Sponsor Group
619-748-9224
COMMENT LETTER 21: CRAIG JONES

From: Craig Jones <bananashke@sbcglobal.net>
To: Keith Greer <Keith.Greer@sandag.org>; Clerk of the Board <Clkry123403@sandiego.gov>
Cc: Neasa Doherty <nasa.doherty@sandiego.gov>; Joyce Lane <joyce.lane@sandiego.gov>; Dee Mittler Miller <deemitller@gmail.com>; Jack Shu <jshu@t2@gmail.com>; terra.bascom@net@sandiego.ca.gov
Subject: Questions re: DEIR for the regional plan

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

Mr. Greer, these are the questions I raised during the Sept. 17 SANDAG joint committees hearing: I was disappointed that there was no response during the hearing; please provide responses in reply to this email:

1. The DEIR analysis of GHG production: Is this analysis of production of GHGs from ALL sectors and operations in the San Diego region - not just from the transportation sector, but from all including land use, energy, agriculture, etc? If so, from the proposed project what is the analysis of GHG production from JUST the transportation sector?

2. Given that the DEIR project alternative 3 is the environmentally superior alternative, and I assume including reduction in production of GHGs, why would this alternative not be the recommended alternative to adopt as the 2021 regional plan?

Craig Jones
858-354-1785
bananashke@sbcglobal.net

RESPONSE TO COMMENT 21-1

The comment asks whether the Draft EIR analysis of “GHG production” includes only the transportation sector or also includes other sectors and operations in the San Diego, and also asks for “the analysis of GHG production from JUST the transportation sector.”

In Impacts GHG-1 and GHG-5, the Draft EIR analysis is based on GHG emissions projections from 15 emissions categories, including the on-road transportation and off-road transportation sectors (Draft EIR pages 4.8-19 to 4.8-26; pages 4.8-31 to 4.8-35). The analysis in Impacts GHG-1 and GHG-5 is based on the 2016 GHG Inventory and Projections for the San Diego Region report (Draft EIR Appendix H). This report provides an estimate of 2016 GHG emissions for the San Diego region and GHG projections for the years 2025, 2030, 2035, 2045, and 2050.

In Impact GHG-3, the Draft EIR analysis is based on GHG emissions projections from the entire on-road transportation sector (Draft EIR pages 4.8-28 to 4.8-29). The on-road transportation sector is defined in Impact GHG-3 as passenger cars and light-duty trucks and heavy-duty trucks and vehicles (Draft EIR page 4.8-28).

The comment does not raise any issues with the adequacy of the Draft EIR and no further response is required.

RESPONSE TO COMMENT 21-2

CEQA does not require that lead agencies adopt the environmentally superior alternative. At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) makes final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See CEQA Guidelines Section 15091(a)(3).) Therefore, this comment will be provided to the Board of Directors and will be considered before it makes a decision on adopting a final Regional Plan.
COMMENT LETTER 22: SAN DIEGO COUNTY LOCAL AGENCY FORMATION COMMISSION

RESPONSE TO COMMENT 22-1

Thank you for your review of the Draft EIR and participation in the environmental review process. Please continue to follow along in this process by visiting SDForward.com.
COMMENT LETTER 23: LIBBY LUCAS

Libby Lucas
4532 Clonard Court
San Diego, CA 92117

October 13, 2021

San Diego Regional Plan EIR
C/O Kirsten Libbret, Associate Planner
401 B Street, Suite 800
San Diego, CA 92101

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

Dear Ms. Libbret:

The focus of the comments herein on the subject DEIR is one of the proposed Regional Plan’s Major Travel Corridors – Coast, Canyons, and Trails, specifically trail-related impacts on wildlife. Here, “trail-related impacts on wildlife” refers to negative (potentially) impacts/ effects on wildlife from the construction and/or use of trails and bikeways for recreation, commuting, or local trips. The wildlife species of concern are those living in, passing through, or sometimes relying on lands conserved for the perpetuation of viable populations of sensitive species pursuant to the approved and draft MCEP/HCPs in San Diego County, and otherwise protected lands such as CDFW’s ecological reserves and USFWS’s national wildlife refuges.

The construction and human use of such trails / bikeways is an admittedly minor component of the proposed Plan, and this focus is in no way intended to minimize the importance of any other aspects of the proposed Plan, but rather only to highlight DEIR’s inclusions on this matter.

The DEIR identifies several trail / trail segments and bikeways among the projects of the proposed Plan. The following two CEQA significance criteria in the DEIR are the most pertinent to the construction and use of trails and bikeways.

BIO-2: Have a substantial adverse effect, either directly or indirectly, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or listed by CDFW or USFWS, including their federally designated critical habitat, or species that are considered sensitive in CEQA Guidelines section 15160.

BIO-3: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Please note the following four points.

1. The following are the trail / trail segments among the projects of the proposed Plan: California Coastal Trail, Coastal Rail Trail, San Diego River Trail – Carbonado Oak Segment, San Diego River Trail – M顶 Park to lakeside banded carin, San Luis Rey River Trail, and inland rail trail - Greenline (pages 6-63 to 6-77 in the DEIR’s Appendix E - Biological Resources: http://www.sandiegoforward.org/sites/default/files/2016.11.18.SDRegionalPlanEIRv4.pdf).

RESPONSE TO COMMENT 23-1

Thank you for your participation in the environmental review process. Further responses to your comments are provided below. SANDAG appreciates and shares your concerns on the importance of wildlife protection from the effects of trails and bikeways.

RESPONSE TO COMMENT 23-2

SANDAG appreciates the summary of the EIR’s biological mitigation measures that pertain to the construction and use of trails and bikeways.
RESPONSE TO COMMENT 23-3

Mitigation measure BIO-3, *Facilitate Wildlife Movement* (page 4.4-106), identifies measures for indirect impacts on wildlife movement corridors, including designing to avoid impacts on wildlife corridors and the preparation of wildlife movement studies where no data exist. In order to capture adaptive management and monitoring as suggested by the comment, the following text has been added to the first paragraph:

Conduct wildlife movement studies and Before-After-Control-Impact-Studies (BACI) where data are lacking, identify corridor widths and wildlife crossing structures, and consider balancing conservation and recreation (Mitrovich et al. 2020) in project design. Include adaptive management and monitoring measures in the CEQA review, mitigation measures, and project design.

RESPONSE TO COMMENT 23-4

Page 4.4-83 (BIO-2) addresses potential impacts from human use on sensitive species resulting from land use changes and regional growth. Consistency with the HCPs is addressed in BIO-4, which assumes that the proposed Plan is consistent with all HCPs. Allowable uses, including recreational trails, are identified in the respective adopted NCCP Subarea Plans, and land use adjacency analyses conducted on the project-specific CEQA level would identify any conflicts with Subarea Plans and require mitigation.

RESPONSE TO COMMENT 23-5

DAG appreciates your comment. In order to mitigate for added project-related levels of human disturbance, the following revisions have been made to mitigation measure BIO-3:

- Allow corridor buffer zones and wide movement corridors to remain or incorporate periodic larger habitat patches along a corridor’s length.
- Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands or NCCP lands.
- Where feasible, prohibit night-time trail use and enforce seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.

Indirect effects / impacts may have an effect later in time or are farther removed in distance, but are still reasonably foreseeable and attributable to project-related activity (DEIR page 4.4-101). Examples of such indirect impacts include: (a) dislocations of animals’ behavior, physiological processes, natural movement patterns for foraging/hunting and /or (b) reducing foraging/hunting/resting/breeding areas functionally inaccessible. Such impacts are most serious when long lasting and/or the affected wildlife don’t have elsewhere to go to meet their needs (i.e., no other suitable habitat is available to them within a distance or linkage they could safely travel) – refer to sources in footnote 1.

As reflected in studies conducted on NCCP-conserved lands in San Diego and Orange County, such studies should have been accounting regularly as part of the implementation of the NCCP/HCPs in the region to inform adaptive management for public use of the conserved lands: two reasons they have not been done as needed are lack of sufficient funding and the fact that this issue is as yet inadequately recognized and addressed despite the documented evidence for it. Regarding the insufficient funding, refer, for example, to Appendix AA of the DEIR, also http://sandiegoforward.org/wp-content/uploads/2021/01/20210128_Full_Draft_EIR.pdf, and the Sierra Club’s August 3, 2022, letter to SANDAG on the Regional Plan. The SANDAG provides related information at http://sandiegoforward.org/wp-content/uploads/2021/01/20210128_Full_Draft_EIR.pdf. Also refer to www.sandiego besieversnetwork.viewpress/releases, specifically the articles at https://www.sandiego-bears.org/wp-content/uploads/2021/01/Full-Draft-EIR_.pdf and https://www.sandiego-bears.org/wp-content/uploads/2021/01/2021-01-28_Full-Draft-EIR.pdf.
• As feasible, within 200 feet of a wildlife corridor, use non-reflective glass or glass treated with non-reflective coating for all exterior windows and building surfaces.
• Use only native species for landscaping within at least 200 feet of identified wildlife corridors.
• Incorporate dimmed, shielded, and directed lighting in areas near corridors that only illuminate the project site; consider high pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors.
• Include permanent noise barriers and sound-attenuating features as part of the project design, and incorporate temporary noise barriers and noise-reduction devices on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
• Install physical barriers (e.g., wildlife fencing) that prevent human and/or domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials (i.e. rubberized asphalt), and traffic calming measures.

RESPONSE TO COMMENT 23-6
Thank you for identifying potential indirect impacts on wildlife species and corridors. As addressed in the response to the preceding comments, and as correctly stated, increase of human use would be addressed on the project-specific level; see also response to comments Lucas 23-3 and 23-4. Informed by studies on the recreational impacts on wildlife (i.e. M. Mitrovich, C. L. Larson, K. Barrows, M. Beck, and R. Unger. 2020. *Balancing Conservation and Recreation*. California Fish and Wildlife, Recreation Special Issue; 11–28), the following bullets were added to the BIO-3 mitigation paragraph:
• Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands or NCCP lands.
• Where feasible, prohibit night-time trail use and enforce seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.
With regards to funding and Appendix AA (see Footnote 3), please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund.
RESPONSE TO COMMENT 23-7

To meet the region’s habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).

RESPONSE TO COMMENT 23-8

SANDAG appreciates the commenter’s concerns. The proposed Plan includes a Climate Adaptation and Resilience Program that takes into consideration the potential effects of and solutions to climate change. Climate change has been a key topic throughout the Draft EIR and is discussed in detail in Appendix C, Climate Change Projections, Impacts, and Adaptation.
Appendix P. Response to Comments on the Draft EIR

COMMENT LETTER 24: JAMES MARPLE

From: JAMES MARPLE <jamesmarple99@yahoo.com>
Sent: Friday, September 3, 2021 8:15:38 AM (UTC-08:00) Mountain, Reykjavik
To: RegionalPlanEIR
Subject: Regional Plan EIR

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

RESPONSE TO COMMENT 24-1

Thank you for participating in the environmental review process. Please continue to follow along in this process by visiting SDForward.com. (Note that since this comment was received blank, SANDAG subsequently followed up with the commenter and received a follow up comment letter on November 11, 2021.).
RESPONSE TO COMMENT 24-2
This comment is an explanation of the previously submitted blank email SANDAG received. SANDAG appreciates your feedback on the Draft EIR. Please see responses below for the comments provided in this letter.

RESPONSE TO COMMENT 24-3
Section 4.10.2 of the Hydrology and Water Quality section in the EIR, includes all of the applicable federal, State, and regional and local laws, regulations, plans, and policies applicable to the proposed Plan. Applicable sections of the California Water Code were included and analyzed to determine if implementation of the proposed Plan would result in a significant hydrology and water quality impact. The analysis in Section 4.10.4 of the EIR concluded that with compliance with regulatory requirements the proposed Plan’s impacts on hydrology and water quality are less than significant.

RESPONSE TO COMMENT 24-4
Please see response to comment Marple 24-3.
Appendix P.1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 24-5

Please see response to comment Marple 24-3. As discussed in additional detail in Section 4.10, through the various regulatory requirements to incorporate hydromodification and low impact development (LID) measures, projects implementing the proposed Plan would maintain pre-development hydrology, and would reduce, infiltrate, and properly manage stormwater runoff such that on- or offsite flooding would not occur.

RESPONSE TO COMMENT 24-6

For further information, refer to the proposed Plan, which discusses in additional detail the Plan’s strategy for creating an integrated transportation system, including one with Complete Corridors that prioritize access to roadways for public transit, active transportation, and shared mobility services. The Active Transportation Network is a critical part of the proposed Plan that represents critical connections needed to get people around and is more than just bike facilities. As is the case with current SANDAG Active Transportation projects, each of these facilities also includes safety and connectivity enhancements for people walking, riding micromobility or transit, and driving. That said, this comment is not a comment about the content or analysis of the Draft EIR, and, as such, no further response is required.

RESPONSE TO COMMENT 24-7

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms.

RESPONSE TO COMMENT 24-8

The proposed Plan includes a number of investments in active transportation including the regional bike network, local bike projects through local streets and road funding as well as complete street investments in mobility hubs, mobility hub amenities (including secure bike parking and e-bike charging), an e-bike incentive program, and Vision Zero programs. In addition, Appendix B describes implementation actions for the proposed Plan, which includes a Regional Active Transportation Plan (including updated Regional Bike
Plan), Comprehensive Multimodal Corridor Plans, Regional Vision Zero Action Plan (including Regional Safety Policy), updating SANDAG grant programs, a quick build program for complete streets, and transportation demand management grants and incentives.

Also, as discussed in comment Marple 24-7, SANDAG will conduct a study that will focus on calculating the true cost of driving. Equity will be a very important component of that study. That said, this comment does not appear to provide a specific comment about the content or analysis of the Draft EIR and no further response is required.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 24-9
Please see response to comment Marple 24-6.

RESPONSE TO COMMENT 24-10
Please see response to comment Marple 24-3.

RESPONSE TO COMMENT 24-11
Many of the Complete Corridor projects in the proposed Plan utilize existing right-of-way and, in many cases, existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project-specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts.

In addition, as referenced in comment Marple 24-8, SANDAG will prepare a Regional Active Transportation Plan that will revisit future active transportation investments, including the feasibility of investments along travel ways such as those listed in the comment.

Thank you for your comment and consideration of the proposed Plan.

Please see response to comment Marple 24-3

RESPONSE TO COMMENT 24-12
This comment appears to assert that the Draft EIR does not analyze a reasonable range of alternatives.

As the Draft EIR explains (page 6-1), SANDAG considered public input provided during the EIR scoping process, and used this input develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested.

Notably, alternatives do not need to be environmentally superior in all respects to the proposed Project. Courts have noted that for complex projects with a wide scope, “it is practically impossible to imagine an alternative that would provide substantial environmental advantages in all respects” (Sierra Club v. City of Orange (2008) 163 Cal. App. 4th 523).

Please see Master Response 1 for additional discussion of alternatives evaluated in the EIR. Please see response to comment Marple 24-5 regarding stormwater management planning.
Integrating its planning with that of every community to maximize rainwater management in keeping with the spirit and intent of the CA Water Code would be a major step toward upgrading the planning process.

James H. Marple
for CRWM and its associates

On Nov 5, 2021, at 10:34 AM, Kristen Uchitel <Kirsten.Uchitel@sandag.org> wrote:

Dear Mr. Marple,

I received an email from you on the San Diego Forward: 2021 Regional Plan Draft EIR. However, there was no text in the body of your email. I wanted to reach out to you to see if you had a comment that you wanted to submit for response and inclusion in the Final EIR. If yes, please email it to me by the close of business next Friday, November 12, 2021.

Thank you very much,

Kirsten Uchitel
Associate Planner

521 W Street, Suite 902
San Diego, CA 92101

Pursuing a brighter future for all
Learn about our commitment to equity.
SANDAG office hours are Tuesday – Friday and every other Monday from 8 a.m. – 5 p.m.
COMMENT LETTER 25: CITY OF OCEANSIDE

October 11, 2021

Mr. Hasan Ichhra:
Executive Director
San Diego Association of Governments (SANDAG)
401 B Street, Suite 800
San Diego, CA 92101

RE: Draft Environmental Impact Report for the 2021 Regional Plan

25-1

The City of Oceanside ("City") appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the 2021 Regional Plan ("the proposed Plan"), which combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensives Plan. The proposed Plan looks ahead to 2050, with the purpose of addressing many systematic transportation challenges faced by the entire San Diego region. The City acknowledges SANDAG's bold vision for a transformed mobility network that promotes convenient and cost-effective transportation options, smart growth, environmental justice, social equity, and Greenhouse Gas emissions reduction. However, the City would like to take this opportunity to identify significant concerns regarding 1.) the proposed Plan and Draft EIR's growth projections and land use assumptions for Oceanside, and 2.) SANDAG's continued lack of funding allocation, support, or implementation of two important regional transportation projects identified and relied on in the proposed Plan. These inadequacies effectively result in miscalculated environmental impacts and insufficient analysis pursuant to the California Environmental Quality Act (CEQA). The City's comments on these two issues are detailed below:

25-2

In a letter to SANDAG on the proposed Plan from the City's Development Services Department, dated August 6, 2021, City staff raised concerns about the proposed Plan's significant underestimation and inconsistent acknowledgment of Oceanside's growth assumptions and land use projections, which should form the basis of the Draft EIR analysis. As such, the Draft EIR's land use analysis is incomplete. Further details are provided below:

• The proposed Plan projects roughly 100,000 fewer new residents in the San Diego region compared to the prior (2016) forecast; however, SANDAG projects the region's population will grow by nearly one million people by 2050. The growth in population will drive job growth and housing demand within the region—adding 500,000 jobs and more than 330,000 housing units by 2050 (Series 13: 2050 Regional Growth Forecasts).

RESPONSE TO COMMENT 25-1

SANDAG would like to thank the City of Oceanside for participating in the environmental review process and for acknowledging support for SANDAG's vision of the proposed Plan. Please see below for detailed responses to the concerns listed by the City.

RESPONSE TO COMMENT 25-2

The proposed Plan and associated land use analysis use the most recent planning assumptions considering local general plans and other factors consistent with Government Code Section 65080(b)(2)(B). The SCS must also "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the GHG emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the state-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the proposed Plan. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions' general plans. The analysis in the EIR is complete and based on planning assumptions provided to SANDAG by local jurisdictions as of 2018. SANDAG acknowledges that Oceanside is working on a General Plan Update and has completed other planning efforts since 2018 that will inform development of the next forecast.

The Regional Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 25-3

The Series 14 Regional Growth Forecast uses the January 2020 vintage of the Department of Finance populations projections, which shows less growth over the next 30 years than previously anticipated in the population projections used for the Series 13 Regional Growth Forecast.
Appendix P1. Response to Comments on the Draft EIR

**RESPONSE TO COMMENT 25-4**

Please see response to comment Oceanside 25-2.

**RESPONSE TO COMMENT 25-5**

The proposed Plan and associated land use analysis use the most recent planning assumptions considering local general plans and other factors consistent with Government Code Section 65080(b)(2)(B). Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11, Land Use, of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.

As noted in the comment, the City’s General Plan Update has not been adopted and is currently in process and will inform development of the next forecast. The proposed Plan is an iterative planning document that is typically updated every 4 years to account for new data, analysis, policy, and experience. In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions’ plans.

**RESPONSE TO COMMENT 25-6**

The comment describes the City’s progress on updating its general plan and associated technical studies. As noted in the comment, the City’s General Plan Update is currently in process and anticipated for consideration by the City Council in Spring 2023. The proposed Plan is an iterative planning document that is typically updated every 4 years to account for new data, analysis, policy, and experience. SANDAG looks forward to coordinating with the City on future Regional Plan updates. Consistency of the proposed Plan with relevant general plans and LCPs is analyzed in Section 4.11 of the Draft EIR. Due to the programmatic nature of the EIR analysis, the Draft EIR does not call out specific policies from local jurisdictions’ general plans, LCPs, or other local planning documents. Consistency of individual second-tier projects with
these policies would be considered during project-specific CEQA reviews.

In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The proposed Plan forecasts development through 2050 consistent with projections from the California Department of Finance but does not represent buildout capacity of jurisdictions' plans.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 25-7

In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The SCS land use pattern proposed in the proposed Plan focuses growth and development in the Mobility Hub areas to facilitate access to transit and improved jobs-housing balance. The allocation of housing units to subregional areas represents general areas projected for future growth in Mobility Hub areas, not specific parcels, for future housing development or housing unit type. A number of land uses at the parcel level, aggregated up, comprise these general areas. The exercise of land use authority is reserved for local jurisdiction.

RESPONSE TO COMMENT 25-8

Chapter 4.11 of the Draft EIR evaluates the land use impacts of the proposed Plan, including a consistency analysis with jurisdictions’ land use plans. Please also see Draft EIR Appendix L, Subregional Plan Consistency Analysis. Environmental impacts of any such inconsistencies are considered throughout the Draft EIR as part of the proposed Plan impact analysis.

RESPONSE TO COMMENT 25-9

In 2016–2018, local jurisdictions, including the City of Oceanside, provided data to SANDAG on housing capacity based on their adopted plans to inform the Series 14 forecast development. The forecasted development pattern in the SCS does not represent buildout capacity of jurisdictions’ general plans. Rather, the SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs and policies in the Plan consistent with SB 375. The Draft EIR’s population forecasts are based on substantial evidence using the best-available data, specifically, the Series 14 Regional Growth Forecast and the regional forecast from the California Department of Finance.

RESPONSE TO COMMENT 25-10

SANDAG looks forward to continuing to coordinate with the City of Oceanside to incorporate latest planning assumptions into future updates of the Regional Plan so that they are included. To the extent this comment refers to the comments above alleging the proposed Plan’s population modeling undercounts growth in Oceanside, see response to
comment Oceanside 25-09. See below responses regarding the two specific transportation projects mentioned in the comment.

RESPONSE TO COMMENT 25-11
The Build NCC I-5 HOV lane project is being constructed from south to north and includes the northern segment as part of its project-level environmental analysis (to Harbor/Vandegrift https://www.keepsandiegomoving.com/Documents/NCC_doc/I-5_Final_EIR-EIS.pdf). Although funding has not yet been identified or programmed, SANDAG continues to pursue funding for implementation of this project consistent with the proposed Plan.

RESPONSE TO COMMENT 25-12
The I-5/SR 78 project (Interchange and Arterial Operational Improvements) is included in the proposed Plan by 2035. The regional transportation network does not include details regarding the types of bicycle and pedestrian facilities to be included with specific corridor projects, and the analysis of those projects will require future planning and coordination with local jurisdictions, community members, and other stakeholders to determine those details; all to be conducted at the project level.

RESPONSE TO COMMENT 25-13
SANDAG will continue to pursue State and federal funding for these (and other) future projects identified in the proposed Plan.
RESPONSE TO COMMENT 25-14
SANDAG would like to thank the City of Oceanside for the feedback submitted and looks forward to future collaboration.
COMMENT LETTER 26: CITY OF POWAY

This comment is related to the proposed Plan and does not address the adequacy of the Draft EIR.

The San Vicente Comprehensive Multimodal Corridor Plan (CMCP) effort is currently underway, and Scripps Poway Parkway is included in the study area for that CMCP. The CMCP will include a suite of solutions for consideration in future planning, implementation, and improvement activities along the corridor, including SR 67 connections with Poway Road and Scripps Poway Parkway. The CMCP will include active transportation, clean transportation, transit, resilience and environment, ROW and utilities, equity, and evacuation considerations. The CMCP stakeholder working group includes representation from the City of Poway, which is intended to integrate jurisdictional priorities into the suite of solutions within the boundaries of the CMCP planning area.

RESPONSE TO COMMENT 26-2

The San Vicente CMCP will consider all relevant and related plans and projects, in collaboration with City of Poway staff, to ensure there is cohesion and consistency between the CMCP and the communities within and adjacent to it, including active and multi-modal transportation considerations.

The CMSP study identifies ways to improve roadway safety, enhance the urban-rural transportation interface (with special consideration given to limiting impacts on surrounding environmental habitats and wildlife), engage with tribal nations, and create greater trip reliability and efficiency throughout the study area while supporting climate action initiatives. The suite of solutions will include active transportation, clean transportation, transit, resilience and environment, ROW and utilities, equity, and evacuation considerations. The City of Poway is an integral member of the stakeholder working group and in the development of the CMCP.

This comment also applies only to the content of the proposed Plan and not the adequacy of the Draft EIR’s contents.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 26-3

Table 4.7-4 in the Final EIR has been updated to reflect correct notes in the General Plan and Habitat Conservation Plan as provided in the comment.

RESPONSE TO COMMENT 26-4

Table 4.11-5 in the Final EIR has been updated to reflect the General Plan element updates as provided in the comment.

RESPONSE TO COMMENT 26-5

This comment addresses the proposed Plan public outreach process, and is not related to the adequacy of the Draft EIR.

To support the development of the proposed Plan, SANDAG implemented a comprehensive public outreach and involvement program consistent with State and federal requirements. Early in the planning process, SANDAG developed a Public Involvement Plan (PIP) to guide the public outreach program, which was updated in mid-2019. The PIP identifies public engagement techniques to involve the public and collect input for the proposed Plan, including public workshops, social media, visualizations, and other means. It describes how to connect with hard to reach communities such as tribal nations and low-income and minority populations. A detailed description of the PIP can be found in Appendix G of the proposed Plan. As part of outreach on the Draft Plan, a virtual open house was held on June 16, 2021, entitled “County Unincorporated,” which included connections to adjacent cities, including Poway.

There will be a further opportunity for public participation on December 10, 2021, at the SANDAG Board of Directors meeting discussing adoption of the proposed Plan and certification of the EIR.
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. See Appendix P.2 for the responses to comments on the proposed Plan. The San Vincente CMCP effort is currently underway. The CMCP will include a suite of solutions for consideration in future planning, implementation, and improvement activities along the corridor, including Highway 67 connections with Poway Road and Scripps Poway Road. The CMCP will include active transportation, clean transportation, transit, resilience and environment, ROW and utilities, equity, and evacuation considerations.

The CMCP stakeholder working group includes representation from the City of Poway, which is intended to integrate jurisdictional priorities into the suite of solutions within the boundaries of the CMCP planning area.

Your comment has been forwarded to San Diego Metropolitan Transit System (MTS).

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

Please see responses L124 through L128 in Appendix P.2.
Appendix P1. Response to Comments on the Draft EIR

Highway. The multi-use path also accommodates a more rural aesthetic and is safer for users. Multi-use paths have become a critical component to the transportation system and are treasured by the communities they are a part of. The addition of the multi-use path along Hwy 67 is more consistent with the goals and policies of the 2050 RTP. We recommend the San Vicente corridor plan provides a separated mixed-use path throughout the full length of the corridor.

Lastly, during the workshop portion for the Draft 2021 Regional Plan, workshops were provide by area (North, East, Central, etc.). Based on the mapped areas shown, Poway residents and community stakeholders were not represented as a part of any region and that outreach with appropriate comment period should be provided prior to moving forward with Draft. I'd be happy to assist you with what an appropriate outreach should be.

Thank you for considering our comments. Please feel free to reach out to me with any questions.

Thank you,

David De Vries, AICP
City Planner
Development Services
City of Poway | 13325 Old Center Drive | Poway, CA 92064
Phone (858) 666-4404 | Fax (858) 666-1231
daevries@poway.org
COMMENT LETTER 27: CITY OF SAN DIEGO

October 13, 2021

SANDAG Regional Plan EIR
C/O Kristen Uchitel
401 B Street, Suite 800
San Diego, CA 92101

Subject: City of San Diego Comments on the Draft Environmental Impact Report for San Diego Forward: The 2021 Regional Plan

Dear Ms. Uchitel:

The City of San Diego (City) Planning Department has received the Draft Environmental Impact Report (EIR) for San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) prepared by the San Diego Association of Governments (SANDAG) and distributed it to applicable City departments for review. The City has reviewed the Draft EIR and appreciates this opportunity to provide comments to SANDAG.

The 2021 Regional Plan represents a major step forward in reducing vehicle miles traveled by single-occupant vehicles and greenhouse gas (GHG) emissions in the region by incorporating five transformational strategies which will be critical to enabling the City to implement its Climate Action Plan. The City applauds SANDAG’s commitment to making infrastructure and technological investments in the mobility system with a greater emphasis on transit, bicycling, and walking as well as innovative and bold strategies to manage demand on regional roadways prioritizing safety and aligning with the City’s commitments to Vision Zero. The City’s General Plan is consistent with the 2021 Regional Plan as both focus development within vibrant mixed-use centers served by high frequency transit, and the City supports the 2021 Regional Plan’s intent to preserve open space from non-sustainable development. The City Planning Department looks forward to closely working with SANDAG to implement the strategies described in the 2021 Regional Plan.

In response to the request for public comment, the City has the following comments on the Draft EIR for your consideration:

***

MOBILITY DEPARTMENT – EMANUEL ALFARJA, ASSOCIATE TRAFFIC ENGINEER – EALFARJA@SANDEFORCE.GOV, (619) 440-5372

In chapter 4.16, Transportation, please consider the following edits and comments:

RESPONSE TO COMMENT 27-1

Thank you for your comments and consideration of the proposed Plan.

RESPONSE TO COMMENT 27-2

Table 4.16-4 has been revised to reflect this comment and now shows 20.9 Class IV lane miles under year 2020 conditions.

Table note #2 for Tables 4.16-5 through 4.16-16 has been updated to read “Mode Share” instead of “More Share.”.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 27-3

Table 4.16-1 has been updated to reflect this comment.

RESPONSE TO COMMENT 27-4

Tables 4.16-4, 4.16-7, 4.16-11, and 4.16-15 have been updated to clarify that the total miles of bicycle facilities reported in the table are the total centerline miles.

The Class IV Cycle Track improvements contained within the proposed Plan are still at the higher level planning stages. Therefore, the form of cycle track (one-way or two-way) has not yet been determined for any of the identified improvements. This level of analysis will need to be conducted at the individual project level, during the design process. As such, this level of information cannot be provided at this time.

Please note that this information can be provided for the existing facilities outlined in Table 4.16-1; however, to maintain consistency with Tables 4.16-7, 4.16-11, and 4.16-15 of the Draft EIR, the same level of facility summary is maintained throughout all tables.

RESPONSE TO COMMENT 27-5

All trail facilities included within the proposed Plan will be designed and constructed based on the trail design standards of the Member Jurisdiction in which they are located. The trail design standards for each Member Jurisdiction should incorporate all relevant ADA standards, thereby resulting in ADA compliant trails. Please note that the United States Access Board has identified four Conditional Exceptions for when ADA standards do not need to be applied to trail facilities, as identified in the Accessibility Standards for Federal Outdoor Developed Areas (May 2014). The four exceptions are as follows:

- Compliance is not practicable due to terrain.
- Compliance cannot be accomplished with the prevailing construction practices.
- Compliance would fundamentally alter the function or purpose of the facility or the setting.
- Compliance is limited or precluded by any of the following laws, or by decisions or opinions issued or agreements executed pursuant to any of the following laws:
  - Endangered Species Act (16 USC 1531 et seq.)
  - National Environmental Policy Act (42 USC 4321 et seq.)
  - National Historic Preservation Act (16 USC 470 et seq.)
Wilderness Act (16 USC 1131 et seq.)
- Other federal, State, or local law, the purpose of which is to preserve threatened or endangered species; the environment; or archaeological, cultural, historical, or other significant natural features

Further detail is provided through the following link:

Because the trail facilities included within the proposed Plan are only conceptual at this time, and have not yet been designed, it is not known if the proposed trail facilities, or a portion of the trail facilities, will need to utilize the ADA exceptions outlined above. Individual trail facilities will be required to go through the CEQA review process, at a project level, and will be subject to design review through the Member Jurisdiction prior to their construction. The level of ADA compliance each trail facility will be able to achieve will be identified, reviewed, and disclosed during this process. This information has been summarized as a footnote on page 4.16-13 of the EIR.

RESPONSE TO COMMENT 27-6
A table note has been added to Table 4.16-9 to describe the methodology used to calculate Miles of Transit.

RESPONSE TO COMMENT 27-7
The decrease in tollway milage under the Year 2050 conditions is due to the expiration of the SR 125 tollway franchise agreement, which ends in 2042. After Year 2042 SR 125, south of SR 54, will be reverted to Caltrans control and the tolls will no longer be issued to the public.

RESPONSE TO COMMENT 27-8
The bottom paragraph of page 4.16-50 has been revised to correct 7.8% to 6.8%.

RESPONSE TO COMMENT 27-9
As the Draft EIR explains (page 6-1), SANDAG considered public input provided during the EIR scoping process, and used this input develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the
major transportation investments and policy options that commenters suggested.

Regarding reduction of fares, mitigation measure GHG-5f provides that during project-level planning, design, and CEQA review of development projects, responsible agencies can and should implement measures including “[s]ubsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets” (Draft EIR pages 4.8-49 and 4.8-50). In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19. See Master Response 1 for further information on the role of subsidized fares and microtransit as an alternative.

RESPONSE TO COMMENT 27-10
The date has been corrected on page 4.5-24 of the EIR as requested.

RESPONSE TO COMMENT 27-11
Mitigation measure CULT-1b on page 4.5-28 of the EIR has been updated to include the requested language that acknowledges consultation/collaboration with local agencies that have qualified cultural resources staff:

…and/or when applicable, qualified local agency staff with technical expertise in archaeological and cultural resources management.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 27-12

The community name "University Center" is correct; therefore, no change has been made.

RESPONSE TO COMMENT 27-13

Midway Pacific” has been changed to “Midway-Pacific” on page 4.17-10 of the EIR as requested.

RESPONSE TO COMMENT 27-14

The community name “Downtown” is correct and adding “San Diego” after “downtown” is not necessary; therefore, no change has been made. The terms “Otay,” “Otay Mesa,” and “East Otay Mesa” have been reviewed and corrected where applicable. “Midway Pacific” has been changed to “Midway-Pacific” as requested on page 4.17-12 and throughout the section.

RESPONSE TO COMMENT 27-15

The community name “Downtown” is correct and adding “San Diego” after “downtown” is not necessary; therefore, no change has been made. The terms “Otay,” “Otay Mesa,” and “East Otay Mesa” have been reviewed and corrected where applicable. “Midway Pacific” has been changed to “Midway-Pacific” as requested throughout the section.

RESPONSE TO COMMENT 27-16

The minor corrections on page 4.17-15 of the EIR have been made as requested.

RESPONSE TO COMMENT 27-17

The comment aligns with the intent of the mitigation measure. Mitigation measure TCR-1b has been revised on page 4.17-16 to state:

3. Permanent Record permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

4. Protecting the resource as agreed upon during the tribal consultation process.

RESPONSE TO COMMENT 27-18

The comment aligns with the intent of the mitigation measure. Mitigation measure TCR-1b has been revised on page 4.17-16 to
incorporate the comments in order to clarify the process and intent of the measure. The revisions are as follows:

- Should a previously undiscovered cultural resource be encountered during construction activities that is determined to be a TCR by the CEQA lead agency in consultation with Native American tribes, the qualified archaeologist, or tribal monitor if an archaeologist is not present, shall direct the contractor to temporarily divert all ground-disturbing activities in the area of the discovery and prepare and implement a mitigation plan consistent with standard mitigation measures set forth in PRC Section 21084.3(b), in cooperation with a qualified archaeologist (if applicable) and in consultation with Native American tribes.

**RESPONSE TO COMMENT 27-19**

The comment aligns with the intent of the mitigation measure. Mitigation measure TCR-1b has been revised on page 4.17-16 to incorporate the comments in order to clarify the process and intent of the measure. The revisions are as follows:

- **Integrate curation of archaeological** The qualified archaeologist shall be responsible for ensuring that all artifacts and associated records associated with the survey, testing, data recovery and/or monitoring of future projects are permanently curated with an appropriate regional center focused on the care, management, and use of archaeological collections if the artifacts must be excavated. This shall be completed in consultation with the Native American representative and does not include Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants (MLDs).
RESPONSE TO COMMENT 27-20

The comment aligns with the intent of the mitigation measure. A fourth bullet has been added to mitigation measure TCR-1b on page 4.17-16 that requires the preparation and submittal of a draft and final monitoring report, per the comment. This addition will ensure and signify the completion of the monitoring program described in mitigation measure TCR-1b. The added language is as follows:

- Upon completion of all ground-disturbing activity, the qualified archaeologist shall prepare and submit a draft and final monitoring report to the CEQA lead agency that describes the results, analysis, and conclusions of all phases of the Monitoring Program, including the provisions for curation and/or repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program.

RESPONSE TO COMMENT 27-21

Thank you for your comment. The responsibilities of the City’s Stormwater Department are understood.

RESPONSE TO COMMENT 27-22

Thank you for your comment. Figure 4.4-15 has been revised to include the transportation network footprint in the Final EIR. In regards to development of transportation projects adjacent to or near MSCP lands, direct and indirect impacts from the proposed Plan’s land use change and transportation network on the County’s adopted MSCP are programmatically addressed under Impact BIO-4 of the EIR. Indirect impacts are assessed qualitatively. Tables 4.4-16 through 4.4-19 quantitatively assess impacts on the County’s MSCP Preserve. Consistent with the County’s adopted MSCP, the County would be consulted prior to any design of projects that could potentially have an effect on the County’s MSCP Preserve. Furthermore, consistent with the EIR, any such projects would be required to be consistent with the County’s MSCP, and no impacts on hardline preserve are expected. Should impacts on the MSCP be unavoidable, boundary line adjustments would be required as mitigation for such impacts, pursuant to the County’s guidelines and in consultation with the County of San Diego. In addition, please see response to comment USFWS 38-4.
RESPONSE TO COMMENT 27-23
"Scripps Institute of Oceanography" has been revised to "Scripps Institution of Oceanography" on page 4.10-15 of the EIR.

RESPONSE TO COMMENT 27-24
Text has been revised according to the comment to “County of San Diego County Regional Airport Authority” on page 4.10-34 of the EIR.

RESPONSE TO COMMENT 27-25
Based on the Department of Water Resource's most recent available data, this statement is correct. No part of the County falls within a levee flood protection zone.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 27-26
Thank you for your comment. The proposed Plan provides a framework for meeting its stated goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies, and programs will confirm SANDAG’s commitment to fully realizing the strategies in the proposed Plan. Individual projects under the proposed Plan are subject to environmental review and will follow applicable laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

RESPONSE TO COMMENT 27-27
The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. Many individual transportation projects in the RTP would be implemented by Caltrans and local governments. It is the responsibility of these implementing agencies to include the City Stormwater Department in their reviews. SANDAG will contact the City Stormwater Department for second-tier projects it approves or carries out.

RESPONSE TO COMMENT 27-28
Thank you for your comment. It is acknowledged that the former City of San Diego Transportation and Stormwater Department was reorganized into individual departments.

RESPONSE TO COMMENT 27-29
Thank you for your comments and consideration of the proposed Plan.
COMMENT LETTER 28: CITY OF SAN MARCOS

RESPONSE TO COMMENT 28-1

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Appendix F of the proposed Plan includes the assumptions used to develop the Series 14 Regional Growth Forecast and the SCS land use pattern. Among other requirements set forth by SB 375, the SCS must "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan.

See below responses to specific comments mentioned in this general comment.
RESPONSE TO COMMENT 28-2

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Appendix F of the proposed Plan includes the assumptions used to develop the Series 14 Regional Growth Forecast and the SCS land use pattern, which considered local general plans and other factors. Among other requirements set forth by SB 375, the SCS must "set forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." The SCS included in the proposed Plan projects development that would achieve the State-mandated GHG emissions reduction target when integrated with the transportation investments, programs, and policies in the Plan by focusing growth and development in Mobility Hub areas. The allocation of housing units to Mobility Hub areas represents general areas projected for future growth, not precise parcel locations, for future housing development or housing unit type. A number of land uses at the parcel level, aggregated up, comprise these general areas. The precise zoning at the parcel level is within local jurisdictions’ land use authority.

Priority areas for future housing growth were identified through a scoring process applied to all Master Geographic Reference Areas (MGRAs) in the San Diego region. Each MGRA received a score based on Mobility Hub propensity analysis results and a land use mixing criterion. MGRAs associated with conserved lands or military installations were identified as "constraints" and excluded from the scoring. The Mobility Hub propensity analysis is described in proposed Plan Appendix T: Network Development and Performance, and considered the number of local street intersections per square mile, vehicle miles traveled in 2016, employment counts, population density, and proximity to "activity centers" such as hospitals, schools, airports, hotels, military installations, shopping centers, and universities and colleges. The land use mix score was calculated based on the percentage of MGRA acreage associated with land use types that are complementary to residential uses. In general, higher scored areas are more favorable to future housing development, and parcels without existing capacity that had both eligible land uses and high scores were assigned additional capacity for the purpose of developing the SCS land use.
use pattern. Within high-scoring MGRAs, SANDAG selected land use codes that could be considered for future residential uses (e.g., low-density office, vacant/undeveloped, arterial commercial, surface parking, hotel/resort, and other public services). Details on this methodology are described in the Series 14 Regional Growth Forecast and SCS Land Use Pattern Subregional Allocation Documentation: https://sdforwarddata-sandag.hub.arcgis.com/documents/SANDAG::series-14-regional-growth-forecast-and-scs-land-use-pattern-subregional-allocation-oct-2021-draft/about.

The Regional Plan and its SCS are iterative planning documents that are typically updated every four years to account for new data, analysis, policy, and experience.

RESPONSE TO COMMENT 28-3

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Appendix F of the proposed Plan includes the assumptions used to develop the Series 14 Regional Growth Forecast and the SCS land use pattern.

Regarding “areas where Series 14 Growth Forecast Households is higher than local assumption,” SANDAG relied upon local general plans and other factors to allocate housing units to subregional areas. Priority areas for future housing growth were identified through a scoring process applied to all MGRAs in the San Diego region. Each MGRA received a score based on Mobility Hub propensity analysis results and a land use mixing criterion. MGRAs associated with conserved lands or military installations were identified as “constraints” and excluded from the scoring. The Mobility Hub propensity analysis is described in proposed Plan Appendix T: Network Development and Performance, and considered the number of local street intersections per square mile, vehicle miles traveled in 2016, employment counts, population density, and proximity to “activity centers” such as hospitals, schools, airports, hotels, military installations, shopping centers, and universities and colleges. The land use mix score was calculated based on the percentage of MGRA acreage associated with land use types that are complementary to residential uses. In general, higher scored areas are more favorable to future housing development, and parcels without existing capacity that had both eligible land uses and high scores were assigned additional capacity for the purpose of developing the SCS land use pattern. Within high-scoring MGRAs, SANDAG selected land use
codes that could be considered for future residential uses (e.g., low-density office, vacant/undeveloped, arterial commercial, surface parking, hotel/resort, and other public services). Details on this methodology are described in the Series 14 Regional Growth Forecast and SCS Land Use Pattern Subregional Allocation Documentation: https://sdforwarddata-sandag.hub.arcgis.com/documents/SANDAG::series-14-regional-growth-forecast-and-scs-land-use-pattern-subregional-allocation-oct-2021-draft/about.

Regarding "areas where Series 14 Growth Forecast Population is lower than local assumptions," the Series 14 Regional Growth Forecast includes assumptions of housing unit production that results in a subregional forecast that includes population declines or lower population growth in certain areas in the region. These housing assumptions, described in proposed Plan Appendix F, include an increase in the region's vacancy rate to 4 percent by 2040, an accounting of vacation rentals and second homes as "unoccupiable," and a decrease in household size from 2.75 persons per household in 2016 to 2.62 persons per household by 2036.

The SCS land use pattern advanced in the proposed Plan focuses growth and development in the Mobility Hub areas, which represent general areas projected for future growth and not precise parcel locations. A number of land uses at the parcel level, aggregated up, comprise these general areas. The precise zoning at the parcel level is within local jurisdictions land use authority.

The Regional Plan and its SCS are iterative planning documents that are typically updated every four years to account for new data, analysis, policy, and experience.
Appendix P1. Response to Comments on the Draft EIR

areas roughly consistently with the City’s General Plan in key locations (i.e., University District and Creek District Specific Plan areas). However, the projected changes are tied to parcels in the vicinity but not the same as what is in the City’s land use plan. There are some forecasted household or population increases or decreases within individual MPOs that are directly inconsistent with the City’s plan. The City has questions regarding the assumptions and model dynamics that create these apparently random projections.

Areas where Series 14 Growth Forecast Households is higher than local assumptions (Attachment A)
- A1. Single-family developments Coronado Hills and Rancho Tesoro (off of Twin Oaks Valley Road south) are accurately forecast to have an increase in households, but why a reduction in population?
- A2. San Marcos Boulevard mixed use shows significant population increases that would not be supported by the levels of development allowed in the land use designation.
- A3. Residential units are assigned to some individual MPOs with industrial and commercial land uses. These areas are not currently planned for residential units (i.e., off of Las Posas and Armorlite).
- A4. Residential units are also assigned to areas designated for passive and recreational open space.

Areas where Series 14 Growth Forecast Population is lower than local assumptions (see Attachment B)
- B1. Population estimates for areas of San Marcos currently under development (i.e., Highlands off of northern Las Pitas, Rancho Tesoro area off of Twin Oaks Valley Road) and Santa Fe Hills, as well as large developments like San Eliso Hills (over 3,000 units), seems to assume that populations in these and similar suburban areas will decrease. New units are being constructed in some of these areas and families continue to move into existing suburban homes. While future urbanizing centers will draw population from many places, we do not necessarily expect a major shift from suburban areas.

We understand the concept that suburban household size may decrease as children leave the home and parents stay in place through middle age. However, regional trends show that household size has increased in San Marcos over the past twenty years, from 3.03 to 3.06 persons per household (U.S. Census American Community Surveys 2010-2019). Anecdotally, given housing prices and demands for larger homes in quality school districts, it seems that turnover of suburban housing to younger families will occur within the Regional Plan horizon. We also anticipate more multi-generational households as children stay in the home through young adulthood or aging parents move in with their children. Additionally, it seems that new State laws streamlining construction of Accessory Dwelling Units and redevelopment of single-family lots will lead to higher, if not at least sustained, populations in suburban neighborhoods. What is the basis for these assumed population decreases?

Staff speculate that some of these inconsistencies could be due to reliance on an amalgamation of land use and population estimates combined with T&L data, or traffic and development assumptions generated for private project analyses (whether or not these came to fruition). We look forward to discussing further with SANDAG staff and/or receiving written feedback regarding these questions.
RESPONSE TO COMMENT 28-4
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. Please see proposed Plan Appendix F, Regional Growth Forecast and SCS Land Use Pattern, for the assumptions used to develop the SCS land use pattern and Appendix T, Network Development and Performance, for information about Mobility Hub network development.

RESPONSE TO COMMENT 28-5
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.
Appendix P1. Response to Comments on the Draft EIR

CC: Jack Griffin, City Manager
Isaac Etchamendy, City Engineer
Joseph Farace, Planning Manager

Attachments:
Attachment A: MGRMs with Increased Households
Attachment B: Change in Population
Appendix P1. Response to Comments on the Draft EIR
COMMENT LETTER 29: SOUTHERN CALIFORNIA TRIBAL CHAIRMEN’S ASSOCIATION

RESPONSE TO COMMENT 29-1

Thank you for your support and for participating in the environmental review process. Please continue to follow along in this process by visiting SDForward.com.
COMMENT LETTER 30: SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

October 11, 2021

Hasan Ibhrata
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Re: San Diego Forward 2021 Regional Plan Draft Environmental Impact Report Comments

Dear Mr. Ibhrata:

The San Diego County Air Pollution Control District (APCD) would like to commend the time and effort invested in the creation of the Draft 2021 San Diego Forward Regional Plan and accompanying environmental document. Together, APCD and SANDAG share common goals, which include improving air quality throughout San Diego County in an equitable manner, supporting the transition to a zero-emission transportation system, and supporting alternatives to single occupancy vehicles. APCD believes that the Draft 2021 Regional Plan will move San Diego County in the right direction and will help improve air quality.

APCD also appreciates our collaborative relationship with SANDAG in other regional planning efforts that support the Draft 2021 Regional Plan and further improve air quality. Such efforts include participation in the Community Air Protection Program (All 617) Partnership Steering Committee, the San Diego County Incentive Project to install electric vehicle charging stations (CalEVP), and the recently launched Accelerate to Zero Emissions collaborative to encourage zero-emission vehicle use. Our strong collaboration in transportation conformity will also ensure that on-road motor vehicle ozone precursor emissions (VOC and NOx) will be reduced in San Diego County by 30% by 2026, and 40% by 2032, compared to 2020 levels. APCD looks forward to continuing these efforts and others with SANDAG well into the future.

Thank you for the opportunity to provide feedback on the Draft 2021 Regional Plan Draft EIR. APCD staff has reviewed the document and endorsed it with our comments for your consideration.

Once again, we appreciate your partnership in ensuring that we all work collectively to improve the air quality in the region.

Respectfully,

Nora Vargas, Chair of the Governing Board
San Diego County Air Pollution Control District

Paula Forbes, Interim Air Pollution Control Officer
San Diego County Air Pollution Control District

RESPONSE TO COMMENT 30-1

SANDAG appreciates the San Diego County Air Pollution Control District’s (APCD) expressed support for the proposed Plan and feedback. SANDAG also appreciates the collaborative relationships between our two agencies and looks forward to continued collaboration towards further improving air quality. Please refer to subsequent responses for detailed responses to APCD’s comments.
RESPONSE TO COMMENT 30-2
The attainment designation for the 2008 ozone standard has been changed to Serious Nonattainment in Table 4.3-1 and within the in-text references on page 4.3-11 of the EIR.

RESPONSE TO COMMENT 30-3
This comment agrees with an EIR mitigation measure, and no further response is required.

RESPONSE TO COMMENT 30-4
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The proposed Final Plan includes additional Rapid bus projects in the 2025 plan phase compared to the Draft Plan that were selected considering equity, system operations, and performance criteria (TL32 in the Coast, Canyons, and Trails corridor, and TL37 in the North County corridor). Frequency and span of service improvements for the transit system have also been added to the proposed Final Plan in Attachment 1 to Appendix A. The proposed Final Plan also supports the electrification of the region's transit buses and the State's Innovative Clean Transit regulation. Appendices A and B of the proposed Plan include SANDAG's proposed commitment of $75 million through 2025, $250 million between 2026 and 2035, and $332 million between 2036 and 2050 for zero-emission buses and infrastructure to accelerate the implementation of MTS' and NCTD's Zero Emission Bus (ZEB) Rollout Plans. Transit agency ZEB Rollout Plans are on the CARB website here: https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit/ict-rollout-plans.

RESPONSE TO COMMENT 30-5
This comment is related to the proposed Plan and is not related to the adequacy of the Draft EIR. A near-term implementation action (Appendix B) of the proposed Plan includes a Blue Line Trolley study to assess the ability to operate express and 24-hour service along the corridor. The results of this study will help inform decisions regarding express Blue Line trolley service and non-rail operational improvement options. High-Speed Commuter Rail from the vicinity of National City to Kearny Mesa is included in the proposed Plan in the 2035 phase. Subsequent plans will revisit the timeline for extending this rail service to the border.
This comment is related to the proposed Plan and is not related to the adequacy of the Draft EIR. Total VMT is expected to increase by 2050 as a result of increased regional population, resulting in additional transportation-related particulate matter. This increase occurs despite the decrease in VMT per capita achieved under the proposed Plan. SANDAG looks forward to additional coordination with APCD and CARB as increases in PM10 emissions are not isolated to the San Diego region. The additional TCMs included in the Clean Air Act are substantially advanced with the proposed Plan including public transportation, bicycling and walking encouragement, traffic signalization, reduced congestion through transportation infrastructure, incident management, and ITS. The proposed Plan also identifies funding for partnering with local jurisdictions and other stakeholders on measures that could enhance VMT reduction, including Vision Zero programs, Complete Streets in Mobility Hubs, and Flexible Fleet pilots.

RESPONSE TO COMMENT 30-7

This comment is related to the proposed Plan and is not related to the adequacy of the Draft EIR. The Rehabilitation of the Desert Line is an unconstrained project in the proposed Plan with MTS as the implementing agency. Improvements would be funded by MTS, potentially in partnership with a leasetholder that would operate the freight rail line. SANDAG encourages its regional partners to develop and implement sustainable and innovative freight solutions that reduce emissions while still facilitating trade. In addition, CARB is developing measures aimed at reducing locomotive and railyard emissions in California.

RESPONSE TO COMMENT 30-8

One of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a one-year pilot that may provide free fares for youth under age 19.
RESPONSE TO COMMENT 30-9

The cumulative impacts of the proposed Plan are discussed in the Draft EIR in consideration of proposed plans such as the U.S. Border Environmental Program: Border 2025, in Chapter 5, Cumulative Impact Analysis, of the EIR. Because cumulative air quality impacts throughout Southern California and northern Baja would be significant, it was determined that the proposed Plan’s incremental air quality impacts are also cumulatively considerable.

The proposed Plan emphasizes continued collaboration between SANDAG and partners on both sides of the U.S.-Mexico border to plan for improved mobility in the border region. This collaboration builds on years of partnerships and active participation in binational programs that advance these goals, including the EPA and SEMARNAT-led Border 2025 program. SANDAG staff regularly participate in groups such as the San Diego-Tijuana Air Quality Task Force and the AB 617 Steering Committee, and have advocated for air quality measures in border communities. In California, regulation of vehicle emissions is managed by CARB. CARB conducts inspections of heavy-duty trucks traveling in California, including those registered out of state and from foreign countries. At border ports of entry CARB inspects heavy-duty trucks for excessive smoke and engine certification label compliance. SANDAG partners with CARB and the San Diego Air Pollution Control District on air quality conformity (see Appendix C) and emission reduction strategies across the region.

In addition, SANDAG has worked with CARB on updates to the CalEnviroScreen tool to provide data and improve how this tool captures various environmental impacts felt on either side of the border. SANDAG will continue participating in such border and environmental focused programs to support coordination of activities to reduce impacts on the binational community.

SANDAG is committed to pursuing programs and projects to further policies focused on electrification of fleets, and EO N-79-20 related to sales of zero-emission personal and medium/heavy-duty vehicles; planning for goods movement strategies that reduce border congestion that exacerbates emissions resulting from vehicle delay; and continuing coordination on strategies identified in the 2021 California-Baja California Border Master Plan.
RESPONSE TO COMMENT 30-10

This comment addresses the proposed Plan and does not relate to the adequacy of the EIR. SANDAG intends to use similar data as prior Performance Monitoring Reports, which included Air Quality Index data from APCD. However, as noted in Chapter 3, Environmental Setting, of the proposed Plan, the data sources listed in Table 3.1 are the best sources identified as of the completion of the proposed Plan and are subject to change if new data sources are identified prior to the completion of the Performance Monitoring Report.
COMMENT LETTER 31: SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

RESPONSE TO COMMENT 31-1
Thank you for your comments on behalf of the San Diego County Regional Airport Authority (SDCRAA). SANDAG appreciates SDCRAA’s input on the EIR and the proposed Plan as well as the background information about the SDCRAA.

RESPONSE TO COMMENT 31-2
Proposed clarifications regarding assumptions related to the Central Mobility Hub in the Navy OTC Revitalization Draft EIS have been made to Chapter 2, Project Description, on page 2-64 of the EIR.
2. Airport Taxicab Replacement Program
On page 4.3-15, the Draft EIR lists the San Diego Air Pollution Control District’s (SDAPCD) “Airport Taxicab Replacement Program” as a regional incentive program to reduce emissions of ozone precursors. This program was concluded on June 30, 2015 based on information available on the SDAPCD’s website. As such, the Airport Authority requests that the Final EIR notes that this incentive program is no longer available.

3. Updated Alquist-Priolo Earthquake Fault Zone Maps
On page 4.7-3, the footnote in the Draft EIR states that the California Geologic Survey is in the process of updating fault zone maps for the region. It should be noted that the new fault zone maps were officially finalized by the State on September 23, 2021. As such, the Airport Authority requests that the Final EIR be updated accordingly.

4. Adopted Airport Land Use Compatibility Plans
The Draft EIR on page 4.9-7 lists all of the Airport Land Use Compatibility Plans (ALUCPs) and their adoption year. However, the Draft EIR includes an incorrect statement that “ALUCPs have been adopted for 14 of the 16 public-use and military airports in the region.” As such, the Airport Authority requests that the Final EIR recognizes that ALUCPs for all 16 public-use and military airports in the San Diego region have been formally adopted by the Airport Authority, acting in its role as the County’s Airport Land Use Commission.

5. Table of San Diego Region Airports
The title for Table 4.11-4 (on page 4.11-30) should be revised to “San Diego Region’s Public and Military Airports.”

6. Airport Development Plan Summary
The Airport Authority requests that the following revisions be made on page 5-5 in the Final EIR’s Cumulative Impacts section to more accurately describe the scope of the SDIA Airport Development Plan:

“San Diego County International Airport Development Plan

Each year, more than 1,817,35 million air passengers use the San Diego International Airport (SDIA). The air cargo capacity of SDIA is currently constrained by limited infrastructure. To maximize the airport’s operational efficiency and make the most of the airport’s 661-acre footprint, SDIA is moving forward with its next master planning phase, the Airport Development Plan (ADP). The ADP provides a development framework to...
RESPONSE TO COMMENT 31-8

Text has been revised in Section 5.2.13 on page 5-52 of the EIR to reflect the updated 2019 Airport Development Plan.
Appendix P1. Response to Comments on the Draft EIR

Ralph Redman, Airport Authority, Airport Planning Manager
Michele Brega, Airport Authority, Senior Director of External Relations
Matt Harris, Airport Authority, Director of Government Relations
RESPONSE TO COMMENT 31-9

Thank you for providing SDCRAA’s letter providing comments on the Proposed Plan. Responses to these comments can be found beginning from ID L343 in Appendix P.2.
ground access improvements, which were prioritized in the 2011 AAMAP, do not appear to be programmed into the Draft Plan:

- **San Diego International Airport**
  - Heavy Rail Grade Separation (Whitherby St. to Laurel St.)
  - I-5 Direct Access Ramps

- **McClellan-Palomar Airport**
  - Palomar Airport Road Widening (I-5 to Hidden Valley Rd.)
  - Additional Airport Access at Owens Ave.
  - Modification of Future Route 445

- **Gillespie Field**
  - Gillespie Field Trolley Station Relocation
  - New Bus Rapid Transit (BRT) Station
  - Marshall Avenue Intersection Improvements
  - BRT Routes (86, 870, & 890) Modifications

- **Cross Border Xpress**
  - SR 905/Britannia Interchange Capacity Increase
  - Britannia Road Widening
  - Siempre Viva Road Widening
  - Local Bus Route (661) Modifications

As such, the Airport Authority requests that the 2021 Regional Plan clarify whether these AAMAP-identified priorities will be implemented or have been substituted with alternative implementation options.

### 2. Connecting Regional Transit Network to SAN

The Airport Authority has been working closely with SANDAG and other public agency partners to identify opportunities to better connect SAN to the regional transit network. As noted in the Draft 2021 Regional Plan, one of the concepts is a fixed-rail transit connection, such as an Automated People Mover (APM), between a Central Mobility Hub at the Old Town Campus and the SAN terminal area. This airport transit connection is anticipated in the Draft Plan to be built in 2035. The Airport Authority looks forward to continuing its collaboration with SANDAG to further refine the APM’s alignment and station location concepts.

The 2016 Airport Transit Plan, which was developed in partnership between the Airport Authority, Metropolitan Transit System (MTS), and SANDAG, identified more near-term opportunities for increasing ridership on public transit to and
from SAN. As recommended in the Airport Transit Plan, the Airport Authority will be launching a new all-electric shuttle service to Old Town Transit Center this fall, in conjunction with the start of the Mid-Coast Trolley Extension operations and increased Coaster service frequency.

Another recommendation in the Airport Transit Plan is the transition of MTS Bus Route 992, which is currently the main transit connection to the Airport, to a Rapid Bus service. It also suggested that combining the new Rapid 992 with other Rapid bus routes, such as the 235 along the El Cajon Boulevard corridor and 235 along the Interstate 15 corridor, could improve airport transit ridership by better linking to major regional destinations and by increasing single-seat access to the San Diego International Airport.

As such, the Airport Authority requests that the 2023 Regional Plan assess the potential ridership benefits from upgrading MTS Bus Route 992 to a Rapid service and extending other existing and planned Rapid routes to serve the SAN terminal areas.

3. Considering Airport Compatibility in New Development Siting

All 16 public-use and military airports in the San Diego region now have an adopted Airport Land Use Compatibility Plan (ALUCP), which provides guidance on appropriate land uses surrounding them to protect the health and safety of people and property within their vicinity. The Draft 2021 Regional Plan states in Chapter 1 (Page 12) that 3.7 million people will be living in the San Diego region by 2050 (13% greater than 2016 levels), creating a need for 440,000 more jobs and 274,000 more homes. Figure 2.4 (Page 27) in the Draft Plan identifies regional mobility hub areas that could accommodate this increased demand for jobs, housing, shopping, and recreation, while being served by expanded transit networks. In the Airport Authority’s initial review, it appears that many of these hub areas are in close proximity to airports.

As such, the Airport Authority requests that the 2023 Regional Plan ensure that new incompatible land uses are not introduced near airports, as outlined in each ALUCP. The Draft Plan’s Environmental Impact Report should also formally assess any land use conflicts with the applicable ALUCPs. Important factors include:

- Limiting new noise-sensitive development within an airport’s noise contours and ensuring that any new noise-sensitive development includes sound insulation.
4. Clarifying SAN Air Cargo Information

The Draft 2021 Regional Plan acknowledges the importance of air cargo in moving goods into and out of the region. Specifically, Appendix Y of the Draft Plan discusses freight movement between the region’s highways and arterials, rail corridors, land ports of entry, maritime port, and the San Diego International Airport. The Airport Authority has identified the following inaccuracies in the presented narrative and data:

- Page 21 in Appendix Y states that “when combined with the rate at which trucks produce emissions per day, neighborhoods in close proximity to the airport are put at a higher [air quality] risk” without citing any environmental impact study to substantiate this conclusion.

The Airport Authority has ensured that current and future emissions from the San Diego International Airport’s activities are included in the most recent 2020 State Implementation Plan (2020 SIP) for attaining air quality standards in the San Diego region under the Federal Clean Air Act. The 2020 SIP determined that SAN’s emissions can be accommodated without causing the region to experience additional exceedances of criteria pollutant standards.

- Figure 2.10 in Appendix Y is an outdated map of SAN, which doesn’t properly reflect the airport property boundaries and onsite aeronautical uses.

- Page 78 in Appendix Y incorrectly states that Capital International Cargo operates at SAN.

- Page 78 in Appendix Y includes statements that air cargo operations are constrained due to limited airport space for expansion.

As identified in its 2013 Northside Improvements Environmental Assessment, the Airport Authority is proposing a new SAN Northside Cargo Development project. The project would include a consolidated...
warehouse to fully accommodate onsite cargo sorting and staging, as well as expanded aprons to accommodate additional cargo aircraft parking.

Additionally, the Airport Authority opened a new 93,000-square-foot Airline Support Building on North Harbor Drive this year, which will allow for more efficient processing of bulky cargo items shipped in the bellies of passenger jets. Approximately 35% of SAN’s freight volumes are transported as “belly cargo.”

Page 78 in Appendix Y relies on the outdated 2009 Destination Lindbergh Study to estimate SAN’s air cargo capacity and identify cargo operational deficiencies.

The FAA approved the most recent SAN aviation activity forecast in June 2019, which is publicly available at www.faa.gov. The forecast anticipates that the number of cargo aircraft operations (i.e., takeoffs or landings) will increase by nearly 71% by 2050, even with the Airport’s single-runway configuration.

As such, the Airport Authority requests that the 2021 Regional Plan be updated to incorporate the more accurate information presented above.

5. Updating Airport Ground Access Modeling Assumptions

Similar to other regional transportation plans, the Draft 2021 Regional Plan relies on an integrated forecasting model to determine future population, housing, and employment growth. This information is then applied to an activity-based model to simulate detailed transportation behaviors, such as where, when, and how people travel on a daily basis.

On page 20 in Appendix C, the Draft Plan states that its model relies on airport passenger survey data from 2008 to estimate airport-related travel patterns and demands on local and regional transportation facilities. The Airport Authority notes that ground access characteristics have changed dramatically over the last decade, especially with the introduction of ride-hailing companies. The Airport Authority also noted that the modeling appears to be based on SAN aviation activity forecasts that were developed in 2013 (Figure S.18 in Appendix S). As previously stated, the FAA approved the most recent aviation activity forecast in June 2019, which is publicly available at www.faa.gov. The new "constrained demand scenario" forecast estimates that SAN will serve approximately 20.3 million enplaned passengers in 2050.
As such, the Airport Authority requests that the 2023 Regional Plan’s modeling be updated to be based on more accurate nodal assumptions for airport users and the more recent SAN aviation activity forecast.

Again, the Airport Authority appreciates the opportunity to provide feedback on the Draft 2021 Regional Plan. Please feel free to contact me at breen@sandiego.org if you have any questions or need additional information.

Sincerely,

Brendan Reed
Director of Airport Planning & Environmental Affairs

CC: Dennis Probst, Airport Authority, Vice President – Development
Ted Ansis, Airport Authority, Airport Planning Manager
Ralph Redman, Airport Authority, Airport Planning Manager
Michelle Brega, Airport Authority, Senior Director of External Relations
Matt Harris, Airport Authority, Director of Government Relations
Thank you for the San Diego Transportation Equity Working Group’s (SDTEWG) expressed support for the proposed Plan. SANDAG appreciates SDTEWG’s participation in the environmental review process, and SDTWEG’s concerns are addressed in detail in the responses to comments that follow.

RESPONSE TO COMMENT 32-1

MTS’s Zero Emissions Bus (ZEB) Pilot Program has set a 2040 goal for full bus electrification. The ZEB Program prioritizes bus assignments on routes serving SB 535 Disadvantaged Communities (DACs) during fleet transition years.

Changes have been made to mitigation measure GHG-5b as described in response to comment Chatten-Brown 34-2, which accelerate adoption of these measures.

Changes to mitigation measure GHG-5a are not required in response to this specific comment. Reduction measures local jurisdiction’s climate action plan (CAP) result in local emission reductions. These local emission reductions can result in air quality co-benefits by reducing natural gas combustion for space and water heating or by reducing VMT from vehicle travel. While many CAPs discuss the potential air quality and public health co-benefits of measures, quantification of these co-benefits is not standard CAP practice nor is it required for CAPs to be adopted by jurisdiction’s elected decision-making body.

Lastly, the comment incorrectly states that the proposed Plan will result in significant PM2.5 impacts. No significant PM2.5 impacts are identified in the Draft EIR.
RESPONSE TO COMMENT 32-3

SANDAG is in the process of preparing the Regional Displacement Study, as identified in Appendix B of the proposed Plan. The commenter is requesting a specific completion date of the study as well as implementation of a regional housing incentive grant program, which are beyond the scope of the EIR; these requests will be considered by the SANDAG Board of Directors when it considers adoption of the proposed Plan.

RESPONSE TO COMMENT 32-4

In addition to making observations about GHG emissions under the proposed Plan and summarizing the conclusions of the Draft EIR, this comment also “strongly recommends” mitigation measures related to electrification of public transit. Specifically, it asserts that mitigation measure GHG-5b “should be amended to include acceleration of the region’s bus fleet to 100 percent electric by 2030 with priority implementation in disadvantaged communities as identified by CalEnviroScreen (CES).”

Mitigation measure GHG-5b (page 4.8-47) requires that SANDAG shall, prior to December 2025, establish one or more funding programs for zero-emissions vehicles and infrastructure, including, among other things, allocation of “funding for zero-emissions buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations).” Entities eligible for funding under this measure include “public transit operators for zero-emission bus and infrastructure funding.” Electric buses and charging infrastructure would qualify to receive funding under this measure.

This mitigation measure was developed in part to help public transit agencies in the San Diego region comply with CARB’s Innovative Clean Transit Regulation, which requires all public transit agencies in California to gradually transition to a 100 percent zero-emission bus fleet. The comment does not provide any reason or evidence that narrowing the focus of this measure from zero-emission technology to electric technology or prioritizing implementation within CES-defined
Mitigation Measure GHG-5b has been accelerated and strengthened in revisions made in response to Draft EIR comments. See response to comment Chatten-Brown 34-2. Moreover, SANDAG does not have the authority to amend this mitigation measure to require that “the region’s bus fleet transition to 100% electric by 2030” or to require that public transit agencies “prioritize implementation in disadvantaged communities as identified by CalEnviroScreen (CES).”

While incorporating this comment into mitigation measure GHG-5b is not required under CEQA, it is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting the proposed Plan. SANDAG has prioritized equity in the proposed Plan more than ever before, promising a system that is a faster, fairer, and cleaner transportation system that is intended to uplift people who have been historically faced with social injustice.

**RESPONSE TO COMMENT 32-5**

The proposed Plan has been developed with equity at the forefront. An equity-specific project list has been included in Appendix H of the proposed Plan. In addition, one of the Implementation Actions listed in Appendix B of the proposed Plan is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY2024, will include an evaluation of fare subsidies for people with low incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a 1-year pilot that may provide free fares for youth under age 19. The proposed Plan supports the electrification of the region’s transit buses and the State’s Innovative Clean Transit regulation. Appendices A and B of the proposed Plan include SANDAG’s proposed commitment of $75 million through 2025, $250 million between 2026 and 2035, and $332 million between 2036 and 2050 for zero-emission buses and infrastructure to accelerate the implementation of MTS’ and NCTD’s Zero Emission Bus (ZEB) Rollout Plans. Transit agency ZEB Rollout Plans are on the CARB website at: https://ww2.arb.ca.gov/our-
RESPONSE TO COMMENT 32-6

This comment asserts that “measures to mitigate GHG from the development of projects” should include partnering with Community Based Organizations (CBOs) and community engagement to identify the best ways to increase transit use through service frequency and affordability. For purposes of responding to this comment SANDAG assumes the commenter is referring to Draft EIR mitigation measure GHG-5f. SANDAG agrees with this comment and has revised mitigation measure GHG-5f as follows (page 4.8-51):

- Measures that reduce VMT by increasing transit use, carpooling, bike-share and car-share programs, and active transportation, including the following:
  - Building or funding a major transit stop within or near development, in coordination with transit agencies.
  - Developing car-sharing and bike-sharing programs.
  - Providing pedestrian network improvements and a comprehensive bicycle network.
  - Providing traffic calming measures.
  - Providing transit incentives, including transit passes for Metropolitan/North County Transit District buses and trolleys.
  - Consistent with the Regional Bike Plan, incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network.
  - Implementing Complete Streets consistent with the SANDAG Regional Complete Streets Policy, including adopting local Complete Streets policies.
  - Implementing Mobility Hubs consistent with the Regional Mobility Hub Strategy.
  - Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.
  - Implementing measures to increase transit use through service frequency and affordability as identified through community engagement.
engagement activities, including but not limited to input from local residents, stakeholders, and Community-Based Organizations.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 32-7

The comment recommends that Draft EIR mitigation measure GHG-5f should be amended to “prioritize an increase of frequency and affordability of bus and trolley services particularly in areas under construction informed by the local CBOs and respective stakeholders.”

Draft EIR mitigation measure GHG-5f states that the County of San Diego and cities can and should implement measures to reduce GHG emissions and achieve zero-net energy during the planning, design, project-level CEQA review, construction, and operation of development projects. It includes several measures that would reduce VMT, including the following related to improving public transit service:

- Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.
- Subsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets.
- Implementing a school bus program in areas currently not served by school buses.

As shown above, mitigation measure GHG-5f already includes measures addressing increased frequency and affordability of bus and trolley services as requested by the commenter. Also refer to response to comment Del Mar 13-6, which shows how the text of mitigation measure GHG-5f has been revised to reference measures that increase frequency and affordability of transit services through input by CBOs, other stakeholders, and residents.

RESPONSE TO COMMENT 32-8

It should be noted that as SANDAG developed the proposed network for the proposed Plan, data on trip-making was used to understand the critical connections of the region. Connections to coastal areas are represented in these critical connections. Implementation of the regional bike network as well as complete streets in Mobility Hubs will support enhancement for active transportation in coastal communities, benefiting all residents in the region including disadvantaged communities.

“Second-tier projects” that would implement the Plan include site-specific transportation network improvements and development projects that would be subject to project-specific environmental review under CEQA and NEPA, where applicable. The corresponding project-
specific environmental documentation would identify significant impacts with regard to conflicts with land use policies of adopted plans, including specific impacts related to coastal access, and identify mitigation measures to avoid or lessen significant physical impacts on the environment resulting from any conflicts.
COMMENT LETTER 33: SIERRA CLUB SAN DIEGO

RESPONSE TO COMMENT 33-1

The proposed Plan significantly reduces per capita VMT; however, total VMT increases through the life of the Plan. VMT growth is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the proposed transportation network improvements and programs in the proposed Plan would help to reduce VMT growth. That said, the increase in VMT, from baseline Year 2016 conditions, was identified as a significant impact under Impact TRA-2 in the EIR.

The proposed Plan exceeds the SB 375 target of 19 percent reductions of GHG by 2035 and the Board Resolution for a 30 percent reduction of GHG emissions from all on-road transportation by 2035. However, the proposed Plan’s GHG emissions would be inconsistent with the State’s ability to achieve the goals of EO B-55-18 and S-3-05. As discussed in additional detail in Section 4.8.4 in the EIR, mitigation measures would help reduce regional GHG emissions by reducing VMT, increasing use of zero-emission fuels, sequestering carbon from the atmosphere, and other measures; they would reduce inconsistency of the proposed Plan’s GHG emissions with the State’s ability to achieve the SB 32, EO B-55-18, and EO S-3-05 GHG reduction goals. However, full implementation of the changes required to achieve these goals is beyond SANDAG’s and local agencies’ current jurisdiction and authority. As such, impacts were identified as significant.

SANDAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. However, there is no current legal or planning requirement that the SANDAG region’s emissions be reduced by the same percentage (“equal share”) as the statewide percentage in order for the State to achieve the Executive Orders’ goals. More specifically, there is no legal or planning requirement that the proposed Plan achieve these reductions or be on a trajectory to achieve these reductions.

While the proposed Plan results in significant impacts related to VMT and GHG, anticipated reductions in per capita VMT and GHG, along with proposed mitigation measures, would reduce inconsistency of the proposed Plan with the State’s ability to achieve VMT and GHG goals.
and puts SANDAG on a trajectory that more closely aligns with regulatory targets.
Furthermore, as discussed in Chapter 2, Project Description, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region’s progress toward the State’s goal of carbon neutrality by 2045.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 33-2

As an initial matter, this comment relates to the contents of the proposed Plan and not to the adequacy of the Draft EIR's analysis. As discussed throughout the Draft EIR and particularly in Appendix C, Climate Change Projections, Impacts, and Adaptation, of the EIR, SANDAG is aware of and deeply concerned about the implications of climate change on the San Diego region.

As described in Section 4.8, the 2017 Scoping Plan establishes the statewide framework for achieving the goal of a 40 percent reduction from 1990 GHG levels in 2030 and putting post-2030 statewide emissions on a downward trajectory toward the long-term statewide GHG reduction goals for 2045 and 2050. The 2017 Scoping Plan indicates that to achieve these targets and goals, long-term investments in renewable energy generation, electrified transportation, energy efficient and decarbonized buildings, enhanced industry efficiency, restoration of California’s natural and working lands, and sustainable solid waste management are among many actions the State must take. In addition, the State has not adopted a plan analogous to the 2017 Scoping Plan that addresses achieving the EO S-3-05 goal of reducing statewide GHG emissions by 80 percent below 1990 levels by 2050 or the B-55-18 goal of achieving statewide carbon neutrality no later than 2045.

As discussed in the Final EIR (page 4.8-40), available research and reports indicate that achieving statewide GHG reduction goals will require major shifts or even fundamental transformations in the economic, social, technological, and political fabric of life in California and beyond, including the development of new technologies and large-scale deployment of new and existing technologies; and in the roles of local, State, and the federal government in regulating economic activities and personal behaviors that affect GHG emissions. The precise pathway to meeting the State’s mid-century goals (e.g., achieving carbon neutrality no later than 2045; reducing emissions to 80 percent below 1990 levels by 2050) is still unclear, but would require the decarbonization of the State’s electrical sector; decarbonization of existing buildings and new construction; electrification of the entire transportation sector; investments in healthy soils; sustainable solid waste and wastewater management; and carbon dioxide removal.
strategies, such as land-based carbon sequestration and direct air capture of CO₂.

The required GHG reductions from the aforementioned sectors will be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone.

SANDAG investments will also support the transition of transit and freight vehicles to zero emission including funding for hydrogen fuel cell electric buses and battery electric buses. The proposed Plan supports investments in the electrification of cars, trucks, and buses and their supporting infrastructure (e.g., EV charging stations and hydrogen fueling stations) and supports the transition of transit and freight vehicles to zero emission including funding for hydrogen fuel cell electric buses and battery electric buses. These electric vehicle investments are one of the ways SANDAG is working to reduce regional GHG emissions and improve local air quality. Appendices A (Table A.17) and B of the proposed Plan show SANDAG's proposed EV commitments such as regional electric vehicle and charging infrastructure incentive programs. Innovation and advanced technologies will be critical to meeting regional GHG reduction goals in 2035.

Furthermore, as discussed in Chapter 2, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region’s progress toward the State’s goal of carbon neutrality by 2045.

**RESPONSE TO COMMENT 33-3**

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

Following the 5 Big Moves data-driven approach to develop a comprehensive and integrated transportation system, the project-evaluation criteria methodology relied on regional data and information analyzed with geospatial tools (ArcGIS) and spreadsheets (Excel). SANDAG used GIS analytics and data, including land use density, access to transit, car ownership, and income to refine the networks. Origin-destination pairs were analyzed and refined to assess which routes warranted commuter rail solutions and which warranted alternate transit solutions that would reduce automobile use.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 33-4

As an initial matter, this comment relates to the contents of the proposed Plan, and not to the adequacy of the Draft EIR’s analysis. The projects from the active transportation network were laid out and prioritized based on the analysis performed in Riding to 2050, SANDAG’s Adopted Regional Bike Plan. While the deadline year for build out is 2050, this just means it would be proposed to be completed by that time. Many projects will likely be completed earlier. This is especially true as new funding sources become available. Additionally, as an early action out of the proposed Plan, SANDAG will be developing a new Regional Active Transportation Network in which projects will be reassessed and reprioritized based on data and community engagement. Finally, the intention of the network proposed in this Plan is a regional framework which facilitates trips associated with regional purposes (trips to school and work, trips within Mobility Hubs, trips to major destinations, and others). The regional network complements the much more extensive networks that local jurisdictions plan and construct on their own streets.

RESPONSE TO COMMENT 33-5

Commuter Rail Line 582 is included in the proposed Plan to serve north-south travel needs in Sorrento Mesa, National City, Kearny Mesa, and University Heights. The South Bay to Sorrento Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of this route.

The proposed Plan is focused on creating more mobility options for all people in the San Diego region through a fast, reliable, and fair public transportation system and micromobility options such as e-bikes and scooters, rideshare, and microtransit shuttles. The Plan also proposes a network of Managed Lanes using existing infrastructure that provides priority access for people using transit, carpooling, or vanpooling. The Managed Lane Network supports transit services making transit a compelling alternative to driving.

The proposed Plan maximizes the region’s existing roads using technology to manage how lanes are used, which reduces traffic congestion and delay. The proposed network of Managed Lanes also encourages carpooling, vanpooling, and taking transit, which creates more roadway capacity without adding additional lanes.
As discussed in Draft EIR Section 4.16, achieving further reductions in the total and per capita VMT generated within the region depends upon additional State policy actions and funding, as well as local jurisdictions’ review and entitlement of individual land use development projects and Regional Arterial System (RAS) transportation projects. In addition, transportation sponsors other than SANDAG, such as Caltrans, must evaluate and potentially mitigate any induced VMT that may be associated with the implementation of enhancements to the freeway and State Highway System.

The Draft EIR proposes mitigation measure TRA-2, which focuses on project-specific mitigation measures that can and should be implemented to further reduce the region’s total VMT and VMT per capita. SANDAG cannot require local agencies implementing development projects, or other transportation project sponsors not receiving TransNet grants, to adopt the mitigation measures, and it is ultimately the responsibility of the CEQA lead agency to determine and adopt mitigation. In addition, the State has indicated that additional State policy actions and funding would be required to close the VMT gap between what the MPOs could achieve through implementation of their SCSs and reductions needed to meet State goals.
RESPONSE TO COMMENT 33-6

As an initial matter, this comment relates to the contents of the proposed Plan, and not to the adequacy of the Draft EIR’s analysis. Planning a better transportation system that reduces congestion, addresses social equity considerations, and meets State and federal mandates for reducing GHG emissions and air pollution is key to SANDAG’s vision for the region. Revenues to fund the projects do not come in all at once, but dollars that are available are applied to ensure that the best projects are initiated first and, as the comment suggests, lays the foundation for future changes to come.

Also as the commenter notes, SANDAG updates the Regional Plan every 4 years, and, as the State continues to identify new plans and technologies to meet the mid-century GHG emission targets, SANDAG will be able to implement these features into future plans to further the region’s progress toward the State’s goal of carbon neutrality by 2045.

RESPONSE TO COMMENT 33-7

As an initial matter, this comment relates to the contents of the proposed Plan, and not to the adequacy of the Draft EIR’s analysis. The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to meet State and federal greenhouse gas and air quality targets. The proposed Managed Lanes Network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit (including Bus Rapid Transit), carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. Solo drivers will have options to use the lanes, but at a price, and transit services can travel congestion free. The result is better optimization of the system that encourages higher occupancy travel but with real alternatives that are competitive with driving.

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are
impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. SANDAG also will collaborate with State and federal agencies that are partnering to evaluate road charge programs in California.

The Plan proposes an expanded public transit network including commuter rail, light rail, Rapid bus, and local bus services. The network was developed to be a comfortable, convenient option to the automobile. The commuter rail service connects the highest demand trip areas between residents and employment centers. The purple line alignment through City Heights is being studied in the South Bay to Sorrento Comprehensive Multimodal Corridor Plan currently underway. Funding for the relocation of rail on the Del Mar Bluffs to a tunnel is prioritized in the proposed Plan.
RESPONSE TO COMMENT 33-8

The Sierra Club's support for Alternative 3 is acknowledged. At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) make final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors (see CEQA Guidelines Section 15091(a)(3)). Therefore, this comment will be provided to the Board of Directors and will be considered before it makes a decision on adopting a final Regional Plan.

RESPONSE TO COMMENT 33-9

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

That said, SANDAG understands the commenter's concerns, which align with the proposed Plan's goal of healthier air and reduced GHG emissions regionwide, while facilitating the efficient movement of people and goods and providing access to affordable, reliable, and safe mobility options for everyone. The proposed Plan is a long-range planning document and is required by federal law to provide a reasonably feasible funding strategy for the projects, policies, and programs of the Plan. Significant additional work, including public involvement, pilot testing, legislation, and much more will be necessary to inform implementation of elements of the proposed Plan. At a minimum this Plan is updated every four years with the latest in planning ideas and concepts.

We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.
RESPONSE TO COMMENT 34-1

This comment asserts that the proposed Plan fails to sufficiently reduce GHG emissions and refers to more detailed comments provided later in the letter. It is true that the Draft EIR found that the proposed Plan would have significant and unavoidable impacts to greenhouse gas emissions. This comment does not assert any reasons why those findings are inadequate.

RESPONSE TO COMMENT 34-2

The comment restates the program-level mitigation measures. The description of these measures as “impermissible deferred mitigation” is not explained in detail in this comment. In general, however, mitigation measures in a first-tier EIR for a program-level project such as the proposed Plan may contain generalized mitigation criteria and policy-level alternatives (Koster v. County of San Joaquin (1996) 47 Cal.App.4th 29). See California Native Plant Society v. City of Rancho Cordova (2009) 172 Cal.App.4th 603 (the details of exactly how the required mitigation and its performance standards will be achieved can be deferred pending completion of a future study). The proposed Plan “integrates land use, transportation systems, infrastructure needs, and public investment strategies within a regional framework,” and its EIR is a first-tier Program EIR for which mitigation measures may be more generalized than in a project-level EIR. (see Draft EIR page 1-1.)

This comments assert that Draft EIR mitigation measures GHG-5a, GHG-5b, GHG-5c, and GHG-5d lack specific performance criteria. However, these mitigation measures do include specific performance standards as described below.

GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans (pages 4.8-46 to 4.8-47).

By adopting this measure, SANDAG would commit to two actions: (1) implementing a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement strategies or measures included in an adopted climate action plan (CAP) or GHG reduction plan, and (2) as part of next cycle of the TransNet Smart Growth Incentive and Active Transportation Grant Programs Smart Growth Incentive Program, continue to require locally
adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and make funding available for local jurisdictions to prepare and update CAPs and GHG reduction plans that keep pace with future longer-term State targets and goals for GHG emissions reductions.

Mitigation measure GHG-5a does include specific performance standards that the grant program(s) will be required to achieve, as described below.

First, the measure commits SANDAG to achieving additional annual GHG emissions reductions during the proposed Plan horizon by implementing projects that would otherwise not occur due to insufficient funding and additional cumulative GHG emissions reductions during the proposed Plan horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. To ensure that this measure achieves additional annual and/or cumulative GHG emissions reductions, funding applicants are required to demonstrate, to SANDAG’s satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding.

Second, to receive the competitively awarded grant funding, projects must be included in an adopted CAP or GHG reduction plan. That adopted CAP or GHG reduction plan is required, in part, to establish a locally appropriate 2030 GHG reduction target for community-wide emissions derived from the State’s legislative 2030 target, and to quantify how local GHG reduction strategies, programs, and measures would meet or exceed the 2030 target. Applicants are also required to estimate the GHG emissions reductions from their project, subject to review and approval by SANDAG.

Third, the measure includes a commitment by SANDAG to structure the grant program(s) by using evaluation criteria, evaluation criteria weighting, or similar means that prioritize the allocation of funds to projects that include measurable programs for achieving the GHG emissions reduction targets identified in that jurisdiction’s adopted CAP or GHG reduction plan. This measure also includes a commitment by SANDAG to report annually to the Board of Directors on the estimated GHG reductions achieved by the projects funded through this grant program.

It is not possible at this time for SANDAG to establish additional performance criteria for this mitigation measure in the form of a
specific numeric amount of GHG emissions reductions that would be achieved by implementation of the grant program(s). While examples of the types of projects that would be eligible for funding are listed in the measure (e.g., existing building retrofits to reduce electricity or natural gas use or install onsite renewable energy systems), there is not sufficient information available at this time about the nature, scope, size, location, and other details of specific projects that would apply for funding (e.g., number, type, age, and condition of buildings that would be retrofitted; number, system size, and type of onsite renewable energy systems installed).

Lastly, SANDAG has made the following minor revisions to the text of mitigation measure GHG-5a to clarify the points raised in this response. The following revisions also reflect edits made in response to comment Chatten-Brown 34-3.

**GHG-5a Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans.** Prior to December 2025 (adoption of the next Regional Plan), and beginning as soon as No later than December 2023, SANDAG shall implement a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement the stated strategies or measures in local jurisdiction CAPs or GHG reduction plans. To be eligible, CAPs or GHG reduction plans shall meet the minimum criteria specified below. Examples of such projects to reduce GHG emissions include existing building retrofits to reduce electricity or natural gas use or install onsite renewable energy systems, activities at the local level that reduce VMT, Smart Cities measures that result in the reduction of GHG, programs and infrastructure to divert organic waste from landfills, and tree planting.

The purpose of such new and/or revised grant program(s) shall be to:

1. (1) achieve additional annual GHG emissions reductions during the proposed Plan horizon by implementing projects that would not otherwise occur due to insufficient funding, and
2. (2) achieve additional cumulative GHG emissions reductions under the proposed Plan planning horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Reducing total annual and cumulative GHG emissions under the proposed Plan planning horizon would reduce the proposed Plan’s contribution to climate change.
To be eligible for grant funding, local jurisdictions would be required to have a CAP or GHG reduction plan adopted by the agency's elected decision-making body. Applicants shall provide sufficient evidence in their funding proposals demonstrating, to SANDAG’s satisfaction, that their projects would not be financially feasible, either due to insufficient funding or the timing of funding availability, in the absence of SANDAG funding. Applications shall include estimated GHG emissions reductions from the project, which shall be prepared using established methods or protocols and shall be reviewed and approved by SANDAG. The grant program(s) shall be structured (e.g., using evaluation criteria and/or weighting of evaluation criteria) to prioritize the allocation of funds to projects based on the amount of measurable progress they achieve towards achieving the GHG emissions reductions targets identified in that jurisdiction’s adopted CAP or GHG reduction plan.

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

- The CAP or GHG reduction plan shall be adopted by the jurisdiction’s elected decision-making body.
- The CAP or GHG reduction plan shall establish a locally appropriate 2030 GHG reduction target for communitywide GHG emissions derived from the State’s legislative target for 2030 (as established by SB 32 or as amended by future legislation), and should establish long-term targets.
- The CAP or GHG reduction plan shall quantify, using substantial evidence, how local GHG reduction strategies, programs, and measures would meet or exceed the local GHG reduction target.

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3 Smart Cities use Information and Communications Technology to enhance the quality and performance of public services in order to reduce resource consumption and operate efficiently. Investment in reliable technology and high-speed connectivity are critical to the success of Smart Cities.
The CAP or GHG reduction plan shall establish a mechanism to monitor the plan’s progress toward achieving the target, including reporting data to SANDAG consistent with, and inclusion in, the Climate Action Data Portal or similar database, and a requirement to amend the plan if it is not achieving adopted goals.

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

**GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure.** (pages 4.8-47 to 4.8-48)

By adopting this measure, SANDAG commits to two actions: (1) establishing one or more new programs to allocate funding for zero-emission buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations), zero-emissions goods movement vehicles (e.g., medium- and/or heavy-duty trucks) and infrastructure, and electric micromobility (e.g., personal electric bikes, cargo delivery electric bikes, neighborhood electric vehicles) and associated infrastructure; and (2) establishing one or more programs to allocate funding for public and private light duty vehicle fleets in the San Diego region to install zero-emission vehicle infrastructure and/or purchase zero-emission vehicles (e.g., battery electric vehicles, fuel cell electric vehicles).

Mitigation measure GHG-5b does include a specific performance standard that the program will be required to achieve, as described below.

As described in the Draft EIR, the mitigation measure requires that new funding awarded through these programs shall be above and beyond that for which reductions in GHG emissions have already been considered as part of the off-model calculations to achieve the SB 375 target. In addition, SANDAG has revised mitigation measure GHG-5b to specify the number of electric bikes, zero-emission buses, and zero-
emission light-duty vehicles and/or chargers that will result from implementation of this measure. SANDAG has also revised this mitigation measure to clarify the timing and other details of implementation. The revisions to the text of mitigation measure GHG-5b are provided below.

**GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure.** Prior to December 2025, SANDAG shall establish one or more new programs to allocate funding for zero-emission buses and infrastructure (e.g., EV charging equipment and/or hydrogen fueling stations), zero-emissions goods movement vehicles (e.g., medium- and/or heavy-duty trucks) and infrastructure, and electric micromobility (e.g., personal electric bikes, cargo delivery electric bikes, neighborhood electric vehicles) and associated infrastructure.

Eligible entities could include but are not limited to public transit operators for zero-emission bus and infrastructure funding; port tenants, distributors, wholesalers, warehouse developers and/or owners, truck owners and/or operators, truck manufacturers, infrastructure providers, and any company that has a fleet of medium- and/or heavy-duty trucks for zero-emission goods movement funding; and local residents, last mile delivery services, and ride-share and/or ride-hail services for electric micromobility funding and associated infrastructure.

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

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

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

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

Prior to December 2025, SANDAG shall also establish one or more programs to allocate approximately $30 million in funding for public and private light duty vehicle fleets in the San Diego region to install zero-emission vehicle infrastructure and/or purchase zero-emission vehicles (e.g., battery electric vehicles, fuel cell electric vehicles). Eligible entities could include, but are not limited to, school districts, water districts, local jurisdictions, TNCs, private businesses, and non-profit organizations. New funding will be above and beyond that for which reductions in GHG emissions have already been considered as part of the off-model calculations to achieve the SB 375 target.

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

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

**GHG-5c Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere** (pages 4.8-48 to 4.8-49).

By adopting this measure, SANDAG commits to establishing a Nature-Based Climate Solutions Program that will remove CO₂ from the
atmosphere by restoring or enhancing natural infrastructure that uses or mimics natural processes to benefit people and wildlife. Mitigation measure GHG-5c does include specific performance standards that the program will be required to achieve, as described below.

First, the measure commits SANDAG to implementing, or providing funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline conditions. Toward this end, prior to implementation of any projects proposed for funding under this program, SANDAG shall prepare, or require the preparation of, studies demonstrating that such proposed projects would increase rates of carbon sequestration over baseline conditions. SANDAG shall document the proposed carbon sequestration for each project receiving funding under this program and provide a report to the SANDAG Board on an annual basis.

It is not possible at this time for SANDAG to specify a specific numeric amount of CO₂ that would be removed from the atmosphere. While examples of the types of projects that would be eligible for funding are listed in the measure (e.g., restoring buried or concreted watercourses to riparian habitat to return them to more natural conditions, restoration of fallow agricultural native coastal sage scrub and chaparral), there is not sufficient information available at this time about the nature, scope, size, location, and other details of specific projects that would apply for funding to be able to estimate the level of GHG reductions that would be achieved. (e.g., acreage, type of vegetative cover, soil type).

SANDAG has revised this mitigation measure to clarify that implementation will begin immediately upon adoption of the proposed Plan. The revisions to the text of mitigation measure GHG-5c are provided below.

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

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

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

**GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide.** (pages 4.8-49 to 4.8-50)

By adopting this measure, SANDAG commits to adopting a Regional Digital Equity Strategy and Action Plan that reduces GHG emissions by identifying and addressing gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). Access to broadband service allows for remote education, telemedicine, work from home, and the potential for other remote access opportunities that reduce car travel and associated GHG emissions.

Mitigation measure GHG-5d does include a specific performance standard that the program will be required to achieve, as described below.

As described in the Draft EIR, the measure commits SANDAG to reducing car travel and associated GHG emissions by increasing access to affordable, high-quality broadband service that in turn allows for remote education, telemedicine, and working from home. The increased access to broadband service results from the measure’s allocation of
$32 million to undertake projects in the Action Plan that have quantified GHG reductions. The measure also commits SANDAG to identifying and quantifying, where possible, the GHG reductions that will result from the Action Plan, and reporting annually to the SANDAG Board on the measure's funding expenditures and quantified GHG reductions.

It is not possible at this time for SANDAG to establish additional performance criteria for this mitigation measure in the form of a specific numeric amount of GHG emissions reductions that would be achieved by implementation of projects to increase access to broadband service that are identified in the Action Plan. This is because the data needed to quantify GHG reductions that would result from increasing access to broadband service are not currently available. While examples of the types of virtual activities that would be supported by increasing access to broadband service are included in the measure and would reduce car travel and associated GHG emissions (e.g., remote education, telemedicine, teleworking), there is not sufficient information available at this time about the specific attributes of communities that currently lack access to broadband service. Examples of these attributes include: communities’ access to telehealth services; the types of jobs held by people in such communities and the ability of those jobs to be performed virtually; the extent of online delivery adoption for packages, medical devices and supplies, and food and household items; and the potential for utilizing remote services for governmental and social services.

SANDAG has revised this mitigation measure to clarify that implementation will begin immediately upon adoption of the proposed Plan. The revisions to the text of mitigation measure GHG-5d are provided below.

**GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide.** Subsequent to adoption of the proposed Plan and prior to January 2023, SANDAG shall adopt a Regional Digital Equity Strategy and Action Plan that identifies and addresses gaps in accessing affordable, high-quality broadband service (Near-Term Action 6(c) in Appendix K). Access to broadband service allows for remote education, telemedicine, work from home, and the potential for other remote access opportunities that reduce car travel and the associated GHG emissions. Investment in reliable technology and high-speed...
connectivity are critical to close the digital divide and the foundation of a Smart Cities efforts to become more efficient, use less resources and reduce GHG. The Action Plan will identify specific actions, responsible parties, and a timeline for implementing the strategies identified in the Action Plan. Prior to December 2024, SANDAG commits to researching and evaluating methodologies for and quantifying, where possible, the corresponding GHG reductions associated with improved access to remote services enabled by broadband (e.g., telehealth, remote work, distance learning, and other remote services). SANDAG shall implement the Next OS (approximately $32 million) identified in the proposed Plan (Table B-1, Page B-5 in Appendix K) to fund projects that advance Smart Cities efforts and close the digital divide. SANDAG shall also participate in federal and State processes to support projects that increase access to broadband infrastructure, as well as pursue federal, State, and private partnerships to leverage additional dollars for these programs. SANDAG shall document SANDAG's funding expenditures and progress on implementing the Action Plan and provide a report to the SANDAG Board on an annual basis. Prior to December 2025 (adoption of the next Regional Plan), SANDAG will identify and commit approximately $32 million to undertake projects in the Action Plan that have quantified GHG reductions. SANDAG shall document the funding expenditures and quantified GHG reductions and provide a report to the SANDAG Board on an annual basis.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 34-3

This comment asserts that mitigation measure GHG-5a “does not allow (the competitively funded grant program) to commence until 2023, does not ensure specific funding sources, or evaluate the performance of funded projects. These three points are responded to individually below.

Regarding commencement of the program, SANDAG has revised the mitigation measure to clarify that SANDAG will start to develop the program immediately upon approval of the Plan with award of grants no later than December 2023. Refer to response to comment Chatten-Brown 34-2 for the revised text of mitigation measure GHG-5a. This implementation date is based on the time to develop the program, secure funding, and include in the budget that would be adopted in July of 2022, and time to set out a call for projects, review applications, and get approvals of the Policy Advisory Committees (PACs) and the Board of Directors.

Regarding funding sources, the measure does identify specific funding sources for mitigation measure GHG-5a. It does not only commit SANDAG to pursue funding as asserted by the commenter. The EIR identifies the following specific funding sources for mitigation measure GHG-5a (page 4.8-47):

Sources of funding that SANDAG shall use include the grants to fund CAP implementation and the Resilient Capital Grants and Innovative Climate Solutions Program (approximately $40 million dollars) identified in the proposed Plan (Table 2-13 in Chapter 2 and Near-Term Actions 9(b) and 9(d) in Appendix K, respectively).

Refer to response to comment Chatten-Brown 34-2 for the revised text of mitigation measure GHG-5a that clarifies the amount of funding that has been allocated to this measure.

Regarding performance evaluation, the measure does not delegate this authority to grant applicants as asserted by the commenter. As explained in the Draft EIR, grant applications are required to include estimated GHG emissions reductions from the project, and SANDAG is required to document and report to the Board of Directors annually on the estimated GHG reductions achieved from the grant program (pages 4.8-46 to 4.8-47). In addition, refer to response to comment Chatten-Brown 34-2 showing how the text of mitigation measure GHG-5a has
been revised to state that SANDAG shall review and approve the GHG emissions reductions estimates included in grant applications.

RESPONSE TO COMMENT 34-4

This comment asserts that mitigation measures GHG-5b, GHG-5c, and GHG-5d lack stated performance criteria.

Regarding GHG-5b, this measure provides new funding for zero-emissions busses and infrastructure, including at least $100 million by 2025. That $100 million figure is a performance criterion, as well as the requirement that that funding be used for zero-emissions busses and infrastructure. This mitigation measure’s performance can easily be tracked by simply calculating the amount of additional funding procured for these zero-emissions buses and infrastructure, and comparing it to the $100 million required by GHG-5b.

Mitigation Measure GHG-5c requires the preparation of studies showing that any proposed nature-based climate solutions would “increase rates of carbon sequestration over baseline conditions.” This requirements acts as the performance standard for this measure. Additionally, this measure identified $40 million of funding for this specific program. (Draft EIR 4.8-47.)

Mitigation measure GHG-5d similarly requires SANDAG to commit a specific amount of funds ($32 million) to “to fund projects that advance Smart Cities efforts and close the digital divide” (page 4.8-49). Additionally this measure provides: “SANDAG shall document SANDAG’s funding expenditures and progress on implementing the Action Plan and provide a report to the SANDAG Board on an annual basis.” The funding commitment and requirement to document expanded access are performance criteria.

Refer to response to comment Chatten-Brown 34-2 for additional information.

RESPONSE TO COMMENT 34-5

This comments asserts “lack of enforcement mechanisms” for mitigation measures GHG-5a, GHG-5b, GHG-5c, and GHG-5d. However, each of these measures does include an enforcement mechanism, as described below.

Mitigation measures GHG-5a through 5d each include a commitment that SANDAG “shall” implement the mitigation measure and each identifies the specific funding source(s) and amounts that SANDAG is committing to use to implement the mitigation measure (pages 4.8-46
to 4.8-49). To ensure these measures are implemented, SANDAG would adopt them as part of the Mitigation Monitoring and Reporting Program following certification of the EIR and adoption of the proposed Plan (CEQA Guidelines Section 15097). Moreover, as described in the Draft EIR under the heading, Background: Summary and Status of Previously Adopted GHG Mitigation Measures (pages 4.8-43 to 4.8-44), SANDAG successfully implemented the GHG emissions mitigation measures that it committed itself to and adopted as part of the EIR prepared for the 2015 Regional Plan.

RESPONSE TO COMMENT 34-6

This comment acknowledges that SANDAG does not have authority to require other agencies to implement certain mitigation measures, such as GHG-5e, but requests that SANDAG should, to the extent it “controls or provides funding for any such transportation projects . . . require that these mitigation measures are mandatory as a condition for receiving funding.” SANDAG’s ability to require other agencies to implement specific mitigation measures, and the Draft EIR’s use of the phrase “can and should” in its mitigation measures, is discussed in Master Response 2.

This response also argues that CEQA Guidelines Section 15168 subdivision (c)(3) requires that all mitigation measures in the proposed Plan be incorporated into any projects relying on this Draft EIR. Section 15168 subdivision (c)(3) states “[a]n agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.” Notably, only “feasible” mitigation measures must be incorporated into a project that tiers off of a programmatic EIR. Because the determination of “feasibility” of any given mitigation measure is made at the project level, this Draft EIR cannot definitively say whether the mitigation measures discussed in the Draft EIR will or will not be incorporated into any specific project that tiers from this analysis. It is therefore not correct that any projects tiering off this Draft EIR must, in all cases, incorporate every mitigation measure discussed in the Draft EIR.

Further, if a second-tier project does not incorporate every EIR mitigation measure, this does not make the Program EIR mitigation measures invalid. Rather, the consequence is that the second-tier CEQA review may not rely on the Program EIR for CEQA streamlining for those significant impacts where Program EIR mitigation measures are not incorporated.
RESPONSE TO COMMENT 34-7

This comment asserts that Impact GHG-5 “is not unmitigable” and that agencies are required to adopt all mitigation measures and discuss and analyze all feasible mitigation measures and alternatives before approving a project with significant impacts.

The Draft EIR identifies Impact GHG-5 as a significant impact in the year 2030, 2045, and 2050. The Draft EIR identifies several mitigation measures to reduce this significant impact by achieving additional GHG emissions reductions above and beyond the reductions shown in the analysis for Impact GHG-5 (mitigation measures AQ-3b, AQ-3c, AQ-4, TRA-2, WS-1a, WS-1b, GHG-5a, GHG-5b, GHG-5c, GHG-5d, GHG-5e, and GHG-5f). However, even with the additional GHG emissions reductions from these mitigation measures, total regional GHG emissions would remain inconsistent with the State’s ability to achieve the 2030 reduction target of SB 32 and the 2045 and 2050 reduction goals of EO B-55-18 and EO S-3-05. Achieving the necessary level of reductions from all GHG emissions sectors will required a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. Therefore, the Draft EIR appropriately concludes that Impact GHG-5 would be significant and unavoidable.

The comment does not identify any additional feasible mitigation measures that would further reduce this significant GHG emissions impact, or provide any evidence to support its assertion that Impact GHG-5 “is not unmitigable.” The Draft EIR provides a detailed discussion of the types of actions required to achieve the statewide GHG emissions targets and goals analyzed in Impact GHG-5 and explains why SANDAG alone cannot bring about all of the needed reductions. No further response is required.

RESPONSE TO COMMENT 34-8

This comment “urges that all GHG emissions be mitigated locally in San Diego County.” This is not required by CEQA. Further, the Draft EIR mitigation measures (GHG-5a through GHG-5f) are focused on reducing GHG emissions within the San Diego region and on projects within the region that would remove carbon emissions from the atmosphere. EIR
mitigation measures do not include out-of-County offsets. No further response is required.

RESPONSE TO COMMENT 34-9

The comment asserts that GHG emissions calculations of transportation and other projects included in the proposed Plan “must include the period of construction and the actual lifespan of the projects” instead of using “an unsupported, arbitrarily limited lifespan such as the periods of 30 years sometimes utilized in CEQA review documents for development projects.” The Draft EIR properly estimates GHG emissions under implementation of the proposed Plan including from construction activities resulting from regional growth and land use change and transportation network improvements and programs as described below.

The GHG emissions projections included in the Draft EIR reflect GHG emissions that would be generated by activities associated with implementing the two main physical components of the proposed Plan: regional growth and land use change, and transportation network improvements and programs. It analyzes the combined emissions of these components.

The projections are reported out to 2050, because this the horizon year of the proposed Plan. Further, Executive Order S-3-05, which is included in the significance threshold for Impact GHG-5, also has a 2050 horizon year for GHG emissions reductions, and the 2017 Scoping Plan sets a path for achieving these GHG emissions reductions in 2050. Projecting Regional Plan GHG emissions beyond 2050 would be speculative due to likely but unknown changes in both economic activity and GHG reduction policies and technology.

Specifically, as explained in Draft EIR Section 4.8.4, Environmental Impacts and Mitigation Measures, the GHG emissions calculations included in the Draft EIR include “15 emissions categories,” one of which is the off-road equipment sector (Draft EIR page 4.8-19). As explained in Draft EIR Appendix H, the off-road equipment sector includes construction equipment emissions from implementation of regional growth and land use change and transportation network improvements and programs under the proposed Plan (Draft EIR Appendix H page X-37). Thus, GHG emissions from construction of projects included in the proposed Plan are accounted for in the GHG emissions calculations included in the Draft EIR.
The Draft EIR does not use "an unsupported, arbitrarily limited lifespan such as the periods of 30 years." Further, the GHG emissions projections are not based on the "period of construction and the actual lifespan" of every individual transportation network improvement and land use development project included in the proposed Plan because the project-specific details needed to perform such analysis are not available at this time (e.g., project design, site conditions, type and number of equipment needed, site conditions, construction start date and duration). As explained in Draft EIR Chapter 4, Environmental Impact Analysis Approach (Draft EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and does not analyze the project-specific impacts of individual projects. Project-specific and site-specific details of subsequent transportation and land use projects will vary widely. When a first-tier Program EIR is prepared, "leaving project-specific details to subsequent EIRs when specific projects are considered" is a proper approach to CEQA tiering (In re Bay Delta [2008] 43 Cal. 4th 1143, 1174).

RESPONSE TO COMMENT 34-10

This comment asserts that the Draft EIR significance criterion for Impact GHG-1, which addresses whether the proposed Plan would directly or indirectly result in an increase in GHG emissions compared to existing conditions (2016), is inadequate because the severity of the climate crisis requires reductions in GHG emissions from baseline, and that instead SANDAG should use a significance threshold focused on reductions of GHG emissions from baseline.

It is misleading to imply that the significance threshold for Impact GHG-1 is the only Draft EIR GHG significance threshold. The Draft EIR in fact uses five significance criteria to evaluate whether implementation of the proposed Plan would have a significant GHG emissions impact (page 4.8-20). As described in the Draft EIR, these significance criteria were developed based on the Initial Study checklist questions provided in Appendix G of the CEQA Guidelines and CEQA Guidelines Section 15064.4 (page 4.8-20). Impact GHG-1, which is addressed by the commenter, is based on CEQA Guidelines Section 15064.4(b)(1), which states that lead agencies should consider, "the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting."

Three of the significance criteria address reductions of GHG emissions below baseline as requested by the commenter:
• GHG-2, which evaluates whether the proposed Plan would conflict with the SANDAG region’s achievement of SB 375 GHG emissions reduction targets for 2035 (a 19 percent reduction from 2005 levels).
• GHG-3, which evaluates whether the proposed Plan would conflict with or impede achievement of an at least 30 percent reduction in per capita GHG emissions from the entire on-road transportation sector by 2035 compared to existing conditions (2016).

GHG-5, which evaluates whether the proposed Plan would be inconsistent with the State’s ability to achieve the 2030 reduction target of SB 32 (40 percent below 1990 levels by 2030) and long-term reduction goals of EO S-3-05 (80 percent below 1990 levels by 2050) and EO B-55-18 (carbon neutrality no later than 2045).
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RESPONSE TO COMMENT 34-11

The comment notes that implementation of the proposed Plan will increase the total number of roadway lane miles within the San Diego Region, under each Horizon Year:

- Year 2025 – Increases 233 lane miles
- Year 2035 – Increases 617 lane miles
- Year 2050 – Increases 788 lane miles

Please note that the transportation analysis information presented in the Draft EIR has been updated in the Final EIR. These updates are primarily due to minor modifications in the transportation network improvements included within the proposed Plan, as noted in Appendix B. Additionally, minor corrections to ABM 2+ were also made, which are detailed in Appendix S of the proposed Plan (page S-104).

The comment also notes that the proposed increase in roadway lane miles is counterproductive to the region’s ability to meet the State’s GHG emission goals, as prescribed in SB 32 and SB 375.

As an initial matter, it should be noted that much of the increase in lane miles under the proposed Plan would be managed lanes, not general purpose lanes, with the vast majority of new lanes in 2035 and 2050 being managed lanes. Although this comment’s notes that the average length of a vehicle trip “does not meaningfully change,” trip length alone is not a complete datapoint where managed lanes promotes carpooling, high-occupancy vehicles, and public transportation, all of which tend to lower per-capita VMT.

This comment is addressed in the Draft EIR, under TRA-2, as follows:

2025 Conditions

Page 4.16-51:

Additionally, as displayed previously in Table 4.16-6, implementation of the proposed Plan, in Year 2025, would increase the number of roadway lane miles within the region by 245,233 miles. Some of the additional lane miles added to the network would be managed lanes (29,344 miles); however, these improvements would still increase the overall vehicular capacity of the region’s roadway network, resulting in the potential for induced travel.

Page 4.16-51:

Implementation of the proposed Plan would also result in an increase of 427,196,923,702 daily VMT generated within the San Diego region.
compared to Baseline Year 2016 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the year 2025 because the proposed Plan would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

**2035 Conditions**

*Page 4.16-53:*

Additionally, as displayed previously in Table 4.16-10, implementation of the proposed Plan, under Year 2035 conditions, would increase the number of roadway lane miles within the region by 622,617 net miles. The majority of the additional lane miles added to the network would be managed lanes (436,449 miles); however, these improvements would still increase the overall vehicular capacity of the region’s roadway network, resulting in the potential for induced travel.

*Page 4.16-53:*

Implementation of the proposed Plan would result in an increase of 2,520,860,1,798,264 daily VMT generated within the San Diego region compared to Baseline Year 2016 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the year 2035 because the proposed Plan would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

**2050 Conditions**

*Page 4.16-55:*

Additionally, as shown in Table 4.16-14, implementation of the proposed Plan under Year 2050 conditions would increase the number of roadway lane miles within the region by 798,788 net miles. The majority of the additional lane miles added to the network would be managed lanes (705 miles); however, these improvements would still increase the overall vehicular capacity of the region’s roadway network, resulting in the potential for induced travel.

*Page 4.16-55:*

Implementation of the proposed Plan would result in an increase of 5,611,752,519,230 daily VMT generated within the San Diego region compared to 2016 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the year 2050 because the proposed Plan would not achieve the
substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Therefore, the impacts associated with the additional roadway lane miles, as they relate to Section 15064.3 of the CEQA Guidelines as well as the proposed Plan’s ability to achieve the substantial VMT reductions needed to help achieve the statewide GHG reduction goals, are identified and disclosed in the Draft EIR.

Additionally, please note that page 4.16-43 of the Draft EIR has been revised to remove the word “slightly” in describing the increase in roadway lane miles.

Finally, please note that Impact GHG-5 does evaluate the consistency of the proposed Plan with the state’s ability to achieve statewide climate goals.
The performance of the existing Rapid Bus service is not indicative of the projected future operations of the same services, or their effect on future VMT production within the region. This is because the majority of the region’s existing Rapid Bus services do not operate within exclusive or managed rights-of-way. Thus, the majority of these routes operate within mixed-flow traffic, which would not be the case with the implementation of the proposed Plan.

As noted in Table 4.16-14 of the Draft EIR, the proposed Plan would implement over 705 lane miles of HOV/Managed Lanes along freeways within the region. This is more than six times the number of HOV/Managed Lane miles that are available within the existing transportation network. Therefore, future Rapid Bus services will have substantially more opportunity to operate within exclusive or managed rights-of-way than what is provided today. It should also be noted that the proposed Plan includes additional operational improvements to the service, transit services, including dynamic transit routing, scheduling, and communications, as well as implementation of smart intersections (see Table A.15 in Appendix A of the proposed Plan for additional details). The benefits associated with these improvements are not reflected through the existing performance of the Rapid Bus services. As such, the existing Rapid Bus operations do not correctly reflect future conditions, and are not relevant to the analysis conducted for Impact TRA-2.

The performance of all future transit services within the San Diego region, including the Rapid Bus services that utilize the Managed Lanes included within the proposed Plan, were evaluated using SANDAG’s updated second generation Activity Based Model (ABM2+). The ABM2+ forecasts future travel patterns within the region based on several factors including, but not limited to, population, employment, available transportation facilities (including Managed Lanes) and services (including Rapid Bus), travel speeds, roadway congestion, and pricing. The ABM2+ is the most up-to-date transportation forecast within the San Diego region and is the best tool in which the metrics used to evaluate effects of land use growth and transportation network improvements can be measured at a regional level, including activity and tour (trip) generation, mode split, average trip length, and VMT. As such, the ABM2+ is the most accurate way to project future transit ridership and its effect on VMT within the region. Thus, the regional...
VMT analysis conducted under Impact TRA-2 was done as accurately as possible, using the best tools available for projecting future transportation patterns and conditions, including Rapid Bus and other transit services.

Finally, please note that the transit improvements included in Draft EIR Appendix B were coded into and accounted for within the ABM2+ model. The ABM2+ model does account for additional travel times and delays that could occur with buses entering and exiting the freeway managed lanes to access transit stations. Therefore, the projected efficiency of the proposed transit system, with the implementation of the proposed Plan, was correctly analyzed under TRA-2.

RESPONSE TO COMMENT 34-13

This comment asserts that the Draft EIR improperly finds that the proposed Plan is “generally consistent” with the 2019 Federal RTP at the 2025, 2035, and 2050 horizons, but that because the proposed Plan results in increases in roadway miles and total-VMT, as well as “continued dominance in mode share of roadway travel,” it is actually inconsistent with the goal of the Federal RTP to “[m]ake transportation investment that result in cleaner air, environmental protection, conservation, efficiency, and sustained living.”

This comment fails to explain how the proposed Plan is inconsistent with the broad policy goals quotes from the 2019 Federal RTP. The quoted Federal RTP policy goals do not make any increase in roadway capacity inconsistent; to the contrary, as discussed in response to comment Chatten Brown 34-11, much of the roadway capacity increase is for Managed Lanes, which have the effect of lowering per-capita VMT and resulting in cleaner air and greater efficiency.

The Draft EIR’s findings are based on substantial evidence. For example, the Draft EIR finds that the proposed Plan is consistent with the Federal RTP goal cited in this comment because “[t]he proposed expansion of the region’s transit network would also provide more viable multi-modal options for travelers, resulting in reductions in both VMT per capita and VMT per employee within the region, thus reducing GHG emissions, creating a cleaner and more sustainable environment” (Draft EIR page 4.16-31; see also Table 4.16-15). These calculations were performed using the ABM2+ modeling, the most up-to-date transportation forecast within the San Diego region.
In addition, this comment is addressed directly within the Draft EIR as follows:

**Year 2025 – Page 4.16-33**

- *Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.* The proposed expansion of the region’s transit network would also provide more viable multi-modal options for travelers, resulting in reductions in both VMT per capita and VMT per employee within the region, thus reducing GHG emissions, creating a cleaner and more sustainable environment.

Please note that the increase in VMT under Year 2025 conditions is associated with the anticipated growth in population and employment within the region, and is not directly associated with the increase in roadway lanes miles. As such, implementation of the proposed Plan will result in a decrease in total VMT of 3,729,924 miles as well as a decrease in VMT per Capita of 1.07 miles, when compared to Year 2025 no-build conditions (See table below). Therefore, the proposed Plan is consistent with the 2019 Federal Plan goal of "*Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.*" It is assumed that growth in regional population and employment is the predominant factor in the projected increase in total VMT from Base Year (2016) conditions.

**Year 2035 – Page 4.16-38**

- *Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.* The associated decreases in average vehicular trip length and travel times noted above would result in a lower average VMT per capita and VMT per employee within the region (see Table 4.16-18). These decreases in vehicular traffic would result in lower GHG emissions, creating a cleaner and more sustainable environment.

Please note that the increase in VMT under Year 2035 conditions is associated with the anticipated growth in population and employment within the region, and is not directly associated with the increase in roadway lane miles. As such, implementation of the proposed Plan will result in a decrease in total VMT of 8,961,822 miles as well as a decrease in VMT per Capita of 2.22 miles, when compared to Year 2035 no-build conditions (See table below). Therefore, the proposed Plan is consistent with the 2019 Federal Plan goal of "*Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.***"
investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living” and that it is assumed that growth in regional population and employment is the predominate factor in the projected increase in total VMT from Base Year (2016) conditions.

Year 2050 – Page 4.16-43

- Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living. The associated decreases in average vehicular trip length and travel times noted above would result in a lower average VMT per capita and VMT per employee within the region (see Table 4.16-19). These decreases in vehicular traffic would result in lower GHG emissions, creating a cleaner and more sustainable environment.

Please note that the increase in VMT under Year 2050 conditions is more associated with the anticipated growth in population and employment within the region, and is not directly associated with the increase in roadway lanes miles. As such, implementation of the proposed Plan will result in a decrease in total VMT of 11,937,229 miles as well as a decrease in VMT per Capita of 2.87 miles, when compared to Year 2050 no-build conditions. Therefore, the proposed Plan is consistent with the 2019 Federal Plan goal of “Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.” and that it is the assumed growth in regional population and employment is the predominate factor in the projected increase in total VMT from Base Year (2016) conditions.

To clarify information presented in the Draft EIR, the following tables show that the additional roadway miles included in the proposed Plan will not increase VMT within the region as compared to the No-Build conditions. Therefore, including the additional roadway miles in the proposed Plan is not inconsistent with the Federal RTP.
### VMT Analysis – Year 2025

<table>
<thead>
<tr>
<th>Metric</th>
<th>Base Year (2016)</th>
<th>Year 2025 No Build</th>
<th>Year 2025 Proposed Plan</th>
<th>% Change from Base Year in 2016</th>
<th>% Change from Proposed Plan to 2016</th>
<th>% Change from Proposed Plan to No Build</th>
</tr>
</thead>
<tbody>
<tr>
<td>VMT per Capita (miles)</td>
<td>18.94</td>
<td>18.73</td>
<td>17.66</td>
<td>-1.28</td>
<td>-6.8%</td>
<td>-1.07</td>
</tr>
<tr>
<td>Total VMT (daily)</td>
<td>83,614,704</td>
<td>88,268,330</td>
<td>84,538,406</td>
<td>923,702</td>
<td>1.1%</td>
<td>-3,729,924</td>
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<tr>
<td>Home-Based VMT</td>
<td>61,848,362</td>
<td>64,134,236</td>
<td>60,476,401</td>
<td>-1,377,961</td>
<td>-2.2%</td>
<td>-3,663,835</td>
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<tr>
<td>Population</td>
<td>3,265,489</td>
<td>3,424,145</td>
<td>3,424,145</td>
<td>158,656</td>
<td>4.9%</td>
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<tr>
<td>Employment</td>
<td>1,646,419</td>
<td>1,789,965</td>
<td>1,762,747</td>
<td>116,328</td>
<td>7.1%</td>
<td>-27,218</td>
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<tr>
<td>VMT per Employee (miles)</td>
<td>18.91</td>
<td>18.41</td>
<td>16.95</td>
<td>-1.96</td>
<td>-10.4%</td>
<td>-1.46</td>
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<tr>
<td>VMT per Service Population</td>
<td>17.02</td>
<td>16.93</td>
<td>16.30</td>
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<td>-4.3%</td>
<td>-0.63</td>
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<tr>
<td>Population within TPAs</td>
<td>764,847</td>
<td>991,785</td>
<td>1,456,876</td>
<td>692,029</td>
<td>90.5%</td>
<td>465,091</td>
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<tr>
<td>Employment within TPAs</td>
<td>609,253</td>
<td>742,870</td>
<td>971,340</td>
<td>362,087</td>
<td>59.4%</td>
<td>220,470</td>
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<tr>
<td>Service Population within TPAs</td>
<td>1,374,100</td>
<td>1,734,655</td>
<td>2,420,216</td>
<td>1,054,116</td>
<td>76.7%</td>
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### VMT Analysis – Year 2035

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<tr>
<th>Metric</th>
<th>Base Year (2016)</th>
<th>Year 2035 No Build</th>
<th>Year 2035 Proposed Plan</th>
<th>Δ Proposed Plan to 2016</th>
<th>% Change from Proposed Plan to 2016</th>
<th>Δ Proposed Plan to No Build</th>
<th>% Change from Proposed Plan to No Build</th>
</tr>
</thead>
<tbody>
<tr>
<td>VMT per Capita (miles)</td>
<td>18.94</td>
<td>18.80</td>
<td>16.58</td>
<td>-2.36</td>
<td>-12.5%</td>
<td>-2.22</td>
<td>-11.8%</td>
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<tr>
<td>Total VMT</td>
<td>83,614,704</td>
<td>94,374,791</td>
<td>85,412,968</td>
<td>1,798,264</td>
<td>2.2%</td>
<td>-8,961,822</td>
<td>-9.5%</td>
</tr>
<tr>
<td>Home-Based VMT</td>
<td>61,848,362</td>
<td>67,184,526</td>
<td>59,251,034</td>
<td>-2,597,328</td>
<td>-4.2%</td>
<td>-7,933,492</td>
<td>-11.8%</td>
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<tr>
<td>Population</td>
<td>2,265,489</td>
<td>3,573,645</td>
<td>3,573,645</td>
<td>308,156</td>
<td>9.4%</td>
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</tr>
<tr>
<td>Employment</td>
<td>1,646,419</td>
<td>1,936,818</td>
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<td>276,056</td>
<td>16.8%</td>
<td>-14,343</td>
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<tr>
<td>VMT per Employee (miles)</td>
<td>18.91</td>
<td>18.19</td>
<td>15.26</td>
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<td>-19.3%</td>
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<td>-16.1%</td>
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<tr>
<td>VMT per Service Population (miles)</td>
<td>17.02</td>
<td>17.13</td>
<td>15.54</td>
<td>-1.48</td>
<td>-8.7%</td>
<td>-1.59</td>
<td>-9.3%</td>
</tr>
<tr>
<td>Population within TPAs</td>
<td>764,847</td>
<td>1,135,597</td>
<td>1,985,967</td>
<td>1,221,120</td>
<td>159.7%</td>
<td>850,370</td>
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</tr>
<tr>
<td>Employment within TPAs</td>
<td>609,253</td>
<td>800,730</td>
<td>1,323,929</td>
<td>714,676</td>
<td>117.3%</td>
<td>523,199</td>
<td>65.3%</td>
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<tr>
<td>Service Population within TPAs</td>
<td>1,374,100</td>
<td>1,936,327</td>
<td>3,309,896</td>
<td>1,935,796</td>
<td>140.9%</td>
<td>1,373,569</td>
<td>70.9%</td>
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### VMT Analysis - Year 2050

<table>
<thead>
<tr>
<th>Metric</th>
<th>Base Year (2016)</th>
<th>Year 2050 No Build</th>
<th>Year 2050 Proposed Plan</th>
<th>Δ Proposed Plan to 2016</th>
<th>% Change from Proposed Plan to 2016</th>
<th>Δ Proposed Plan to No Build</th>
<th>% Change from Proposed Plan to No Build</th>
</tr>
</thead>
<tbody>
<tr>
<td>VMT per Capita (miles)</td>
<td>18.94</td>
<td>18.90</td>
<td>16.83</td>
<td>-2.91</td>
<td>-15.4%</td>
<td>-2.87</td>
<td>-15.2%</td>
</tr>
<tr>
<td>Total VMT</td>
<td>83,614,704</td>
<td>100,071,163</td>
<td>88,133,934</td>
<td>4,519,230</td>
<td>5.4%</td>
<td>-11,937,229</td>
<td>-11.9%</td>
</tr>
<tr>
<td>Home-Based VMT</td>
<td>61,848,362</td>
<td>69,918,150</td>
<td>59,300,949</td>
<td>-10,617,201</td>
<td>-17.1%</td>
<td>-10,617,201</td>
<td>-15.2%</td>
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<tr>
<td>Population</td>
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<td>3,699,373</td>
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<td>0</td>
<td>0%</td>
<td>0</td>
<td>0%</td>
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<tr>
<td>Employment</td>
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<td>2,095,301</td>
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<td>26.8%</td>
<td>-7,983</td>
<td>-0.4%</td>
</tr>
<tr>
<td>VMT per Employee (miles)</td>
<td>18.91</td>
<td>18.21</td>
<td>14.32</td>
<td>-4.59</td>
<td>-24.3%</td>
<td>-3.89</td>
<td>-21.4%</td>
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<tr>
<td>VMT per Service Population (miles)</td>
<td>17.02</td>
<td>17.27</td>
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<td>-10.5%</td>
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<td>-11.8%</td>
</tr>
<tr>
<td>Population within TPAs</td>
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<td>Employment within TPAs</td>
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<td>70.8%</td>
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<td>Service Population within TPAs</td>
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<td>1,529,648</td>
<td>161.7%</td>
<td>1,529,648</td>
<td>74.0%</td>
</tr>
</tbody>
</table>

Please note that the transportation analysis information presented in the Draft EIR has been updated in the Final EIR. These updates are primarily due to minor modifications in the transportation network improvements included within the proposed Plan, as noted in Appendix B of the Plan. Additionally, minor corrections to ABM 2+ were also made, which are detailed in Appendix S of the Plan (page S-104).
RESPONSE TO COMMENT 34-14

As the comment points out, the proposed Plan would result in an increase in the total VMT generated within the region as follows:

- **Year 2025 Conditions:** 477,196 daily VMT
- **Year 2035 Conditions:** 2,520,860 daily VMT
- **Year 2050 Conditions:** 5,611,752 daily VMT

Please note that the transportation analysis information presented in the Draft EIR has been updated in the Final EIR. These updates are primarily due to minor modifications in the transportation network improvements included within the proposed Plan, as noted in Appendix B. Additionally, minor corrections to ABM 2+ were also made, which are detailed in Appendix S of the proposed Plan (page S-104). Therefore, the increases in total regional VMT are now:

- **Year 2025 Conditions:** 923,702 daily VMT
- **Year 2035 Conditions:** 1,798,328 daily VMT
- **Year 2050 Conditions:** 4,519,230 daily VMT

As noted on page 4.16-48:

> Because there are no State-recommended total VMT significance thresholds for regional plans such as an RTP/SCS, a qualitative threshold is used: would the proposed Plan achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals? If the Regional Plan would cause substantial increases in total VMT, then it would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Therefore, because no guidance has been provided by the State on this issue the Draft EIR used a threshold of no change from baseline conditions as the threshold. To the extent this comment implies the Draft EIR does not disclose the significant impact of increased total VMT, the increase in daily VMT, from baseline Year 2016 conditions, was identified as a significant impact under Impact TRA-2, as noted in the following sections of the Draft EIR:

- **2025 Conditions** - Page 4.16-48, Paragraph 5
- **2035 Conditions** - Page 4.16-50, Paragraph 4
- **2050 Conditions** - Page 4.16-52, Paragraph 2

Lastly, as noted on page 4.16-48 of the Draft EIR (last paragraph), interim VMT per capita targets were derived to identify if the proposed Plan would be on track to meet the State’s target of 14.3 percent
Appendix P1. Response to Comments on the Draft EIR

reduction in VMT per capita by Year 2050, as compared to baseline conditions. It is clearly stated in the last sentence of the paragraph “The interim VMT per capita targets were not used to determine impact significance.” This is further reflected in the TRA-2 conclusion sections, for each horizon year, where the State’s target of 14.3 percent is used as the significance threshold for each horizon year and not the identified interim VMT per capita target. Thus the methods used for interpolating interim VMT reduction goals are not relevant to the EIR’s analysis and disclosure of significant VMT impacts.

RESPONSE TO COMMENT 34-15
This comment refers to the use of the phrase “can and should” in mitigation measures where another agency, and not SANDAG, would have the responsibility to implement and carry out. Please refer to Master Response 2 for a response to this comment, where it is described why the use of this language is specifically allowed by CEQA in these circumstances.
Section 4.4 of the EIR analyzes the impact on biological resources at a programmatic level based on best available information, including impacts on sensitive species, vegetation communities, wetlands, wildlife movement, and consistency with policies and approved HCPs. Impacts were analyzed based on the programmatic footprint developed for the proposed Plan, and mitigation measures were identified accordingly. Additional analysis will be conducted on a project-specific level under CEQA, including project-specific impact analysis of biological resources and identification of mitigation measures. The comment does not explain why the EIR “erroneously” concludes that significant impacts are unavoidable.

RESPONSE TO COMMENT 34-17

The comment asserts that impacts addressed in BIO-4 are not less than significant based on the fact that the proposed Plan is in conflict with State and federal goals to protect 30 percent of land and water resources by 2030, and that this goal would not be achieved if the impacts on BIO-1, BIO-2, and BIO-3 are unavoidable. The MSCP targets to protect 172,000 acres of natural lands (excluding agricultural lands); the MHCP targets to protect 19,000 acres. Approximately 100,000 acres of land in the North County MSCP will be unavailable for development. The majority of lands in the East County (approximately 90 percent) are public lands that are already conserved. The total amount of public lands (undeveloped or in open space) in San Diego County amounts to 1.7 million acres. With San Diego County having almost 3 million acres of landmass, of which approximately 2 million is undeveloped or planned for conservation, the conservation percentage of San Diego County far exceeds 30 percent target. Therefore, the EIR is consistent with the goals identified in EO N-82-20 (October 7, 2020) and EO 14008, 86 Federal Register 7619. The comment also asserts that the proposed Plan is in conflict with regional HCPs. All approved HCPs have been included and addressed in this EIR, and impacts on approved HCPs have been analyzed; see discussion under Impact BIO-4 in Section 4.4 and Table 4.4-5. The HCPs have been designed to allow for impacts on biological resources so long as the appropriate mitigation measures are adhered to, including mitigation measures outlined in each participating jurisdiction’s ordinances and guidelines that reflect consistency with the regional HCPs and Subarea Plan. These guidelines and ordinances are listed (together with other representative ordinance and guidelines)
in Table 4.4-6. Each Subarea Plan has different conservation classifications, which were included in the data analysis and models in this EIR (see the Analysis Methodology under Impact BIO-4). The EIR assumes that all regional and local guidelines and ordinances would be adhered to, and that impacts on hardline preserves would be avoided at the project-specific design level. However, should impacts on hardline preserves be unavoidable, local ordinances governing the implementation of the Subarea Plans have provisions, such as Boundary Line Adjustments, that would be implemented to avoid the loss of highly valuable biological resources and conserved lands consistent with all legal and regulatory provisions of the HCPs. Therefore, the conclusion in Impact BIO-4 correctly identifies that the EIR is not in conflict with any approved HCPs.

RESPONSE TO COMMENT 34-18

Please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund in the alternatives. The comment asserts that the proposed Plan does not provide a clear path to the establishment of an essential regional funding source to implement existing and planned regional HCPs. As described in Appendix A of the proposed Plan the final Plan has included a commitment to fund regional habitat conservation, management, and monitoring under a new funding allocation that when combined with the nature-based climate solutions program and habitat mitigation for transportation projects would total $3 billion. Furthermore, each local jurisdiction that is signatory to the conservation plan and the Implementing Agreement with the Wildlife Agencies that provides the legal “take” authorizations identified in the conservation plan is obligated to fund local costs for land conservation, acquisition, management, and monitoring.
RESPONSE TO COMMENT 34-19

Please see Master Response 2 and response to comment Chatten-Brown 34-6, which explain why the EIR’s approach to mitigation measures to be implemented in second-tier projects is consistent with CEQA requirements. As Master Response 2 explains, second-tier transportation project EIR mitigation measures, such as biological resource mitigation measures, would be implemented for transportation projects that SANDAG directly approves or carries out, and implementation of applicable and feasible mitigation measures would be a grant condition for capital projects funded by SANDAG’s TransNet grant programs.

RESPONSE TO COMMENT 34-20

To meet the region’s habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan). As such, an additional mitigation measure is not required.

RESPONSE TO COMMENT 34-21

Please refer to Master Response 1 for a response to this comment, which explains why the EIR’s alternatives analysis complies with CEQA requirements and addresses potential alternatives to substantially lessen VMT and biological resource impacts.
RESPONSE TO COMMENT 34-22

SANDAG appreciates the comments received for consideration. Please refer to prior responses for in depth discussions regarding the feedback received. Please continue to follow along in this process by visiting SDForward.com.

V. Conclusion

Based on the foregoing comments, we respectfully request that SANDAG revise the Regional Plan and recirculate the DEIR to achieve further GHG and VMT reductions, improve protections for biological resources, and resolve the issues addressed in this letter.

Thank you for your consideration of this matter.

Sincerely,

[Signature]

Sanjana Sopkar
Josh Chaten-Brown
Attorneys for Sierra Club San Diego
RESPONSE TO COMMENT 35-1

This comment inaccurately describes the proposed Plan as emphasizing auto-based transportation at the expense of public transportation. The proposed Plan emphasizes connections to mobility options in neighborhood hubs—whether it be transit, ride share, shuttles, scooter or bike share, walking, or biking. By building out from these centers of activity to an even broader system of smart roadways and transit services, the proposed Plan provides alternatives to driving for both short and long trips around the region.

Transit Leap improvements make public transit a compelling option to driving—fast, convenient, and safe. Improvements include commuter rail, light rail, Rapid, local bus, and ferry service. Next Generation Rapid Service is a Rapid bus service operating in priority travel lanes and/or separated guideways and is given traffic signal priority. Commuter rail includes new and significantly upgraded rail service with high-speed trains that are fast and convenient and provide a compelling alternative to driving. Light Rail Transit (LRT) includes improvements to existing light rail services and new tram services.

Managed Lanes offer priority access to people using transit, carpooling, riding motorcycles, or vanpooling along with emergency vehicles and some low-emission vehicles with appropriate decals. Managed Lanes would be expanded by repurposing shoulders or existing travel lanes, as feasible. Managed Lane improvements are planned for both interregional and urban corridors. Interregional corridors connect us to neighboring counties and beyond and account for about 70 percent of vehicle miles driven on the region’s freeways. Urban corridors connect local cities and account for 27 percent of vehicle miles driven on the region’s freeways. Interregional corridor trips are typically longer than 20 miles while trips made on urban corridors are often between 5 and 20 miles. See Appendix A, Transportation Projects, Programs, and Phasing, of the proposed Plan at A-2.

This comment also inaccurately describes the financial plan included in the proposed Plan as speculative. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR
450.322(f)(10)(ii). See Appendix V, Funding and Revenue, of the proposed Plan for additional information about revenue sources. Also, these introductory comments summarize more detailed comments, for which additional responses are provided below.

**RESPONSE TO COMMENT 35-2**

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives, that are potentially feasible, and that reduce environmental impacts. The discussion also explains why the Draft EIR was not required to consider SOFAR's proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of the reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.
RESPONSE TO COMMENT 35-3

This comment inaccurately characterizes the nature of the roadway projects in the proposed Plan. The proposed Plan emphasizes connections to mobility options in neighborhood hubs—whether it be transit, ride share, shuttles, scooter or bike share, walking, or biking. By building out from these centers of activity to an even broader system of smart roadways and transit services, the proposed Plan provides alternatives to driving for both short and long trips around the region.

Transit Leap improvements do make public transit a compelling option to driving—fast, convenient, and safe. Improvements include commuter rail, light rail, Rapid, local bus, and ferry service. Next Generation Rapid Service is a Rapid bus service operating in priority travel lanes and/or separated guideways and is given traffic signal priority. Commuter rail includes new and significantly upgraded rail service with high-speed trains that are fast and convenient and provide a compelling alternative to driving. LLRT includes improvements to existing light rail services and new tram services.

Where possible, rather than adding new roads, the proposed Plan repurposes general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every four years, providing opportunities to reflect changes in the network. The proposed Plan’s improvements to the freeway system are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and HOV travel.

Rural corridors serve many remote destinations, mostly located along state routes traversing the eastern two-thirds of the region, and provide people access to rural towns and lands, as well as connectivity to the interstate system. Rural corridors are economic lifelines for rural communities and the region’s many tribal nations. Rural corridors provide access to jobs, education, and healthcare, as well as needed infrastructure for the movement of goods, deliveries, and emergency vehicles.

Along I-8 in East County, projects included in the proposed Plan benefit interchanges to this freeway with substantial safety improvements for SR 94, SR 76, and SR 79 and other state routes. Physical safety improvements are realized with a variety of projects, including shoulder...
widening and curve straightening. The region’s rural and tribal communities also need new investments in broadband infrastructure. This infrastructure is an essential part of the transportation technology envisioned along rural corridors, by providing travelers with real-time travel information and enabling access to Flexible Fleet options such as shuttles and other on-demand transportation services. But it will not only improve mobility along rural corridors, it will enable residents to, for example, work remotely and learn online.

For the roadway component of the proposed Plan, SANDAG is required to analyze induced demand impacts, which are documented in proposed Plan Appendix D. The activity-based model and other analyses used to inform the Plan have been reviewed through SANDAG’s peer review process and documented in the technical methodology submitted to CARB, also included in Appendix D.

With respect to project phasing under the proposed Plan, the proposal for a “Transit First” plan fails to recognize that there are regulatory constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as Federal Transit administration (FTA) Section 5307 or Regional Surface Transportation Program (RSTP) funds are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and redirect to transit include funds going to other agencies, such as the State Highway and Protection Program (SHOPP) funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

Specific to the comment that critical projects would not be constructed until 2050, the phasing of projects in the proposed Plan depends upon several factors including project readiness, connectivity, social equity, and anticipated revenues by implementation period. As the proposed Plan is implemented, phasing of projects may change if opportunities arise to advance projects into earlier phases of the Plan. All LOSSAN
double tracking projects are phased for completion in 2025 and 2035. Batiquitos Lagoon Double Track, San Onofre to Pulgas Double Track Phase 2, Eastbrook to Shell Double Track, and San Dieguito Double Track projects are phased for completion by 2025. Carlsbad Village Double Track, La Costa to Moonlight Double Track, Moonlight to Swami Double Track, San Onofre Creek Double Track (CP Songs Double Track), and San Mateo Creek Double Track projects are phased for completion by 2035. The Miramar Tunnel is phased for completion by 2050.

Regarding land use and housing, under the SCS for the proposed Plan, 31 Mobility Hub areas were identified as optimal locations for siting transit investments that maximize regional connectivity, and for focusing future transit-oriented growth. By 2050, 53 percent of the population, 71 percent of the jobs, and 54 percent of the housing for the region are projected to be in Mobility Hub areas. See Tables F.4 through F.6 in Appendix F of the proposed Plan for more details on the regional population, jobs, and housing within Mobility Hub areas. Development under the SCS for the proposed Plan is substantially more compact than previous plans, conserving far more land and open space due to densification in the Mobility Hub areas. The proposed Plan does “encourage intensified, compact land use,” and includes transportation network improvements, including roadway improvements, that support this land use goal. See Chapter 2 and Sections 4.2, 4.4, 4.11, and 4.14 of the EIR for more discussion of the land use impacts under the proposed Plan.

SANDAG is developing a Regional Housing Incentive Program to meet the goals of the proposed Plan and assist local jurisdictions in achieving housing goals. SANDAG’s housing incentive program will include development of a regional anti-displacement strategy, and consider climate change and resiliency, availability of transit and active transportation, and consistency with the transportation improvements included in the proposed Plan. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues. The Plan proposes a land use scenario that accommodates the Regional Housing Needs Assessment and, when combined with the transportation system, allows the region to meet its SB 375 greenhouse gas reduction target.
RESPONSE TO COMMENT 35-4

This comment inaccurately characterizes the mode share shifts achieved under the proposed Plan. This comment relies upon mode share numbers generated by the California Household Travel Survey (CHTS), which presents a less accurate picture of regional behavior and mode share than SANDAG’s ABM2+ forecast, for several reasons. The CHTS was conducted by Caltrans between 2010 and 2013. This was during the time of the Great Recession, which created unique influences on travel behaviors and characteristics. The SANDAG ABM2+ was updated based on the San Diego Regional Transportation Study (SDRTS) conducted between 2016 and 2017. The SDRTS used smartphone-based travel diaries as the primary means of travel data collection and included nearly 6,200 participating households. From a data quality perspective, the SDRTS is considered superior to the CHTS based on the more recent time period for survey collection, travel survey data collection methodology, and San Diego region sample size.

Additionally, the CHTS and the SDRTS are limited to travel surveys of residents. However, the ABM2+ forecasts travel for all types of trips—resident, visitor, cross border, airport, non-resident trips starting/ending external to San Diego, commercial, and truck. SANDAG collects supplemental travel survey and data on these other travel markets for inclusion in ABM2+ forecasts. Again, from a data perspective, the ABM2+ forecast, including mode share numbers, is superior to the CHTS numbers referenced in SOFAR’s comment.

As shown in Appendix O-2 of the EIR, the transit mode share for all trips in 2050 is 5.2 percent under the proposed Plan, and the transit mode share for work trips in 2050 for peak period and all day is 13.2 percent. This comment inaccurately characterizes GHG reductions achieved under the proposed Plan. The proposed Plan achieves 20.4 percent per capita GHG reductions from passenger vehicles and light duty trucks by 2035 and exceeds the regional GHG reduction target of 19 percent.
RESPONSE TO COMMENT 35-5

DAG recognizes that substantial reductions in global, state, and regional GHG emissions are an urgent priority, and strives in its Regional Plans and programs to do its part in reducing GHG emissions from all sources. Section 4.8.1 of the EIR properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth’s atmosphere and contribute to global warming. The EIR describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change (“climate destabilization”) are summarized, with detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region provided in EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, providing descriptions of State legislation and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor’s EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

CEQA does not require analyzing projected mode share for specific areas within the region in a programmatic impact analysis prepared for a comprehensive regional plan under CEQA. The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity, which is described in the EIR. (CEQA Guidelines Section15146.)

The Draft EIR properly evaluates the significant environmental impacts of the proposed Plan consistent with CEQA requirements, and concludes that the Plan would have significant and unavoidable GHG emissions impacts. The Draft EIR then identifies mitigation measures and alternatives to the proposed Plan that would reduce this significant impact. For more detail see EIR Section 4.8 and Chapter 6.0.

RESPONSE TO COMMENT 35-6

This comment expresses an opinion about challenges facing the region. It does not address EIR adequacy, and no further response is required.

RESPONSE TO COMMENT 35-7

is comment inaccurately asserts that Managed Lane investments do not support transit use. The Managed Lane system would support a robust network of Next Generation Rapid Service operating in priority travel

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lanes and/or separated guideways and would be given traffic signal priority. Next Generation Rapid routes would provide competitive alternatives to single-occupancy vehicle travel and be connected via the Regional Mobility Hub Network. In addition, the proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to modes of transportation that would reduce VMT over single-occupancy vehicles, i.e., transit, carpools, vanpools, and low-emission vehicles with appropriate decals.

Data from model runs comparing the proposed Plan network with Managed Lane investments to a network consistent with SOFAR’s proposed Climate, Housing and Transit Alternative, which omits new Managed Lanes, demonstrates that the proposed Climate, Housing and Transit Alternative’s impacts on VMT are similar to the proposed Plan’s impacts, and that it does not substantially reduce the proposed Plan’s significant impacts.

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See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration.
RESPONSE TO COMMENT 35-8

This comment inaccurately describes the revenue sources included in the proposed Plan as highly speculative. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii)). New funding sources are revenues that do not currently exist or that may require additional steps before the MPO or transit agency can commit such funding to transportation projects (2017 RTP Guidelines for MPOs). Strategies for ensuring their availability must be identified and future revenues may be projected based on historical trends, including consideration of past legislative or executive actions (2017 RTP Guidelines for MPOs). The level of uncertainty in projects based on historical trends is generally greatest for revenues in the “outer years” (10 years or more) of an RTP.

Specific to the revenue sources cited, this comment fails to recognize that SANDAG has succeeded in passing two past sales tax measures to fund transportation in the region, indicating it is reasonable to assume additional transportation sales tax measures would be passed. With respect to ridehailing service fees, SANDAG has an existing partnership with researchers at UC Berkeley to analyze data collected by SANDAG to better understand the time and price tradeoffs of ridehailing service users, exploring opportunities, challenges, and social equity considerations for policies to promote pooled ridehailing trips. This analysis will be completed by FY 2023 and will inform the development of a ridehailing fee program by 2026.

The State is currently studying implementation of a road user charge, and it would be unreasonable for SANDAG to disregard the actions at the State-level that would directly impact anticipated revenue during the period covered by the proposed Plan. The proposed Final Plan now assumes collection of both the State and regional road usage charges would begin by 2030. As a near-term action, SANDAG will launch a study in FY 2022 to evaluate different transportation funding sources, and a working group would oversee the development of a comprehensive value pricing and user fee implementation strategy that supports the goals of the proposed Plan.
SANDAG is partnering with the Sacramento Area Council of Governments and Southern California Association of Governments on a Caltrans Planning Grant to develop a research design framework for pilot projects to test the effectiveness of road pricing strategies combined with demand management approaches (incentives) to advance equity, reduce vehicle miles traveled and GHG emissions, manage roadway congestion, and provide sustainable revenues for system maintenance and operation. This study will put California MPOs in a position to complement the efforts of Caltrans through its Road Charge Pilots Program. Caltrans was recently awarded $2.15 million from the Federal Highway Administration to continue pilot testing user acceptance and the technological feasibility of implementing road user charges.

Both studies will include a robust public-engagement process and lay the foundation for prioritizing different goals and understanding the potential of these tools in advancing these goals. SANDAG will leverage existing coordination efforts with the other major MPOs in California to ensure an integrated approach when possible. Once these initial studies are complete, SANDAG will begin deploying pilot testing by FY 2026 to inform the detailed design of new pricing. Through coordination with State and MPO partners, SANDAG would pursue legislative action for authority to administer a road usage charge program by 2030.

Specific to the federal gas tax, an increase is assumed based on public discussion by members of Congress and the president to introduce legislation to increase the gas tax, a carbon tax, or a tax on other fuels based on the life cycle for carbon emissions in order to fund a modern and strong transportation system.

**RESPONSE TO COMMENT 35-9**

This comment asserts that the Final EIR should disclose which capital projects would be prioritized in the event of a funding shortfall, which is a speculative scenario. Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii)). See Appendix V, Funding and Revenue, of the proposed Plan for additional information about revenue sources.

Further, under CEQA case law, an EIR is entitled to assume that assumptions that are an integral part of the proposed project will become reality (*Village Laguna of Laguna Beach, Inc. v. Board of...*)

**RESPONSE TO COMMENT 35-10**

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider SOFAR's proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR's proposed Climate, Housing and Transit Alternative from detailed consideration.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 35-11
As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. Alternative 2 was included for detailed consideration because it reduces other significant impacts, including air quality and population and housing, as compared to the proposed Plan. See Chapter 6 and Table 6-3 for additional discussion of the comparative impacts of the proposed Plan and Alternative 2. The discussion also explains why the Draft EIR was not required to consider SOFAR’s proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration.

RESPONSE TO COMMENT 35-12
As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider SOFAR’s proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration.

SOFAR suggests that the Draft EIR should have evaluated a project alternative that substantially reduced VMT below existing levels.

Alternative 3 consists of the proposed Plan transportation network, a land use pattern that restricts all regional growth to the Mobility Hubs, and more progressive value pricing and user fees policies than what is included in the proposed Plan; it achieves lower VMT than the proposed Plan, though still above existing levels. An alternative including further VMT-reduction measures to reduce VMT below existing levels is not currently feasible for several reasons, including:

- **Further** substantial changes needed in State and federal policy and legislation. These would include still further changes in state road pricing policy, land use policies, and parking policies—beyond those included in the proposed Plan and Alternatives 2 and 3—that are not reasonably foreseeable.
- Lack of funding for further and accelerated major transit service improvements (recognizing that, as discussed in additional detail in
subsequent discussion, increased transit investments alone cannot achieve substantial VMT reductions). The request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network.

- Severe economic and social impacts caused by substantial increases in driving costs. Alternative 3 already increases fees compared to the proposed Plan. From a consumer standpoint, increases in fuel or vehicle user costs can be a trade-off with discretionary expendable income for purchasing food, clothing, and other personal items, especially for lower income households. A significant increase in fuel cost or vehicle user fees would also result in lower spending in other areas of the economy, and economic disruption would occur in adjusting to higher fuel or vehicle registration prices.

- Lack of authority for SANDAG and local governments to implement such further measures. For example, SANDAG has no authority to increase state road pricing, or require local governments to implement land use or parking policies.

SANDAG cannot control the total regional population growth that is the main cause of total VMT increases. As SANDAG modeling indicates, population growth is the main driver of future VMT growth. Alternative 3 would result in VMT per capita of 15.6 (home-based) compared to the proposed Plan VMT per capita of 16.03 in 2050. Alternative 3 would result in a total VMT increase of 2,756,715 miles per day in year 2050, which is approximately 39 percent lower than the proposed Plan (total VMT increase of 4,519,230 miles per day in year 2050). Population growth under the proposed Plan, however, increases by 13 percent. Even with decreases in driving per capita, under Alternative 3 total VMT still increases by 3.2 percent compared to 2016 because population growth outpaces driving reductions. As courts have noted, “CEQA is not intended as a population control measure” (Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 220).
RESPONSE TO COMMENT 35-13

As explained in Master Response 1, the Draft EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives and that are potentially feasible. The discussion also explains why the Draft EIR was not required to consider SOFAR’s proposed Climate, Housing and Transit Alternative in detail. See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration.

To be legally adequate under federal transportation law and SB 375, the proposed Plan is required to address transit projects, highway projects, and sustainable land use patterns; all three components are integrated into the basic project objectives described in EIR Section 2.4 (page 2-6). An EIR must discuss alternatives to a project in its entirety but is not required to discuss alternatives to each particular component of a project. SOFAR proposes a “transportation-network” alternative but does not address the regulatory constraints on redirecting roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan. For instance, federal formula funds such as FTA Section 5307 or RSTP are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but cannot advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and redirect to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

Given these constraints, Alternative 3 did not assume an alternate transportation network different than that of the proposed Plan. Instead, Alternative 3 included more progressive pricing and user fees, as well as an intensified land use pattern in order to reduce significant impacts on the environment. Inclusion of this more compact land use pattern is appropriate as the SCS land use pattern is an integral component of a regional plan, as mandated by SB 375. As compared to the proposed Plan, Alternative 3 reduces significant impacts on aesthetics and visual resources, agriculture and forestry, air quality, biological resources, cultural resources, geology, GHG, mineral resources, noise, public services and utilities, transportation, and
wildfire. See Chapter 6 and Table 6-3 for additional discussion of the comparative impacts of the proposed Plan and Alternative 3.

RESPONSE TO COMMENT 35-14

This comment inaccurately characterizes the nature of the roadway projects in the proposed Plan.
Where possible, rather than adding new roads, the proposed Plan repurposes general purpose lanes or shoulders to create Managed Lanes. The Managed Lane system is important for supporting the transit network and Flexible Fleets envisioned in the proposed Plan. The Regional Plan is updated every four years, providing opportunities to reflect changes in the network. The proposed Plan’s improvements to the freeway system are limited to Managed Lanes using existing infrastructure such as general purpose lane conversion and shoulders to facilitate additional transit and high occupancy vehicle travel.
This comment also inaccurately characterizes the nature and comparative impacts of the proposed Plan as compared to SOFAR’s proposed Climate, Housing and Transit Alternative on freeway expansion and roadway capacity. In 2050, under the proposed Plan, the region has 2,122 miles of general purpose freeway lanes (including auxiliary lanes) due to existing lane conversions. In 2050, under SOFAR’s proposed Climate, Housing and Transit Alternative, which includes no roadway improvements, the region has 2,352 miles of general purpose freeway lanes (including auxiliary lanes). The proposed Plan includes 821 miles of HOV/Managed Lanes, which SOFAR inaccurately suggests will continue to contribute to substantial increases in VMT and GHG emissions. Data from model runs comparing the proposed Plan network to SOFAR’s proposed Climate, Housing and Transit Alternative demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State’s GHG reduction goals and does not substantially reduce the proposed Plan’s significant impacts.
Appendix P1. Response to Comments on the Draft EIR

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See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration, including a discussion of selected elements of SOFAR’s alternative that are similar to the proposed Plan’s elements.

With respect to project phasing under the proposed Plan, this comment fails to recognize that there are regulatory constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP funds are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as SHP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 35-15

Alternative 3 in the Draft EIR evaluated what additional reductions of VMT and GHG could potentially be achieved by further restricting development to Mobility Hubs, increasing fees associated with automobile use, and decreasing costs associated with transit use. This comment inaccurately characterizes the comparative potential of the proposed Plan network and SOFAR’s proposed Climate, Housing and Transit Alternative to reduce VMT and GHG. Data from model runs comparing the proposed Plan network to SOFAR’s proposed Climate, Housing and Transit Alternative demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State’s GHG reduction goals and does not substantially reduce the proposed Plan’s significant impacts.

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See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration.

This comment also fails to recognize that there are constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct
to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

**RESPONSE TO COMMENT 35-16**

The proposal to advance all of the Alternative's transit projects to the first 10 years of the proposed Plan fails to recognize that there are constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and re-direct to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

This comment inaccurately characterizes the GHG reductions that can be achieved under the proposed Plan network as compared to SOFAR's proposed Climate, Housing and Transit Alternative. SANDAG modeling data demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State's GHG reduction goals and does not substantially reduce the proposed Plan’s significant impacts.
## Response to Comments on the Draft EIR

### Table: Database Comparison

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<td><strong>SB 375 VMT/Person</strong></td>
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<td>21.8</td>
</tr>
<tr>
<td><strong>Final Per Capita GHG Reductions for 2005</strong></td>
<td>-20.%</td>
<td>-21.0%</td>
</tr>
</tbody>
</table>

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration.

### RESPONSE TO COMMENT 35-17

This comment makes statements about challenges facing the region, to which no further response is required. This comment also asserts the need to recirculate the Draft EIR based on the inaccurate assertions made in comments 35-1 through 35-16, for which responses have already been provided above. No information has been added to the Draft EIR that would trigger recirculation under CEQA Guidelines Section 15088.5.
The proposed Plan aligns with many of the elements of the Climate, Housing and Transit Alternative while meeting all legal requirements. As the Plan is implemented, SANDAG looks forward to continuing to advance efforts related to climate, housing, and transit.

SANDAG is developing a Regional Housing Incentive Program to meet the goals of the proposed Plan and assist local jurisdictions in achieving housing goals. SANDAG’s housing incentive program will include development of a regional anti-displacement strategy, and consider climate change and resiliency, availability of transit and active transportation, and consistency with the transportation improvements included in the Regional Plan. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.

The proposed Plan proposes a land use scenario that accommodates the Regional Housing Needs Assessment and, when combined with the transportation system, allows the region to meet its SB 375 greenhouse gas reduction target.

This comment inaccurately assumes the proposed Climate, Housing and Transit Alternative would significantly reduce VMT and GHG emissions, and substantially increase transit use. The Climate, Housing and Transit Alternative would have similar impacts as the proposed Plan on VMT and GHG emissions, and there is no evidence transit use would be greater.

See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration, including a discussion of selected elements of SOFAR’s alternative that are similar to the proposed Plan’s elements.
Under the SCS for the proposed Plan, 31 Mobility Hub areas were identified as optimal locations for siting transit investments that maximize regional connectivity, and for focusing future growth. Nine factors were used to assess the propensity for transit-based trip making to identify the Mobility Hub areas integrated into the proposed Plan, including employment, population density, age, proximity to activity centers, trips within census block groups, communities of concern, and VMT per capita.

The areas indicated in the figure provided by SOFAR are well-aligned with the Mobility Hub areas identified in the proposed Plan. The Mobility Hub areas contain 70 percent of the Center for Neighborhood Technology’s H+T index values that are considered affordable, i.e., less than the regional median. The remaining 30 percent of the H+T index values that are considered affordable are located primarily in East County, where development would contribute to urban sprawl in the backcountry and impede achieving regional reductions of VMT and GHG emissions.

While land use authority is reserved to local jurisdictions—the 18 cities and the County—SANDAG will work closely with jurisdictions to incentivize building of housing in the Mobility Hub areas. In coordination with the development of the proposed Plan, SANDAG will embark on developing a housing incentive program that will support jurisdictions in the development and adoption of policies and process improvements to accelerate housing production. The program will also look for ways to leverage funding from the State to provide more housing in the region and meet the goals of the proposed Plan.
Appendix P1. Response to Comments on the Draft EIR

Figure 1: H+T Costs as a Percent of Income

Average Housing + Transportation Costs N Income

Farming in both housing and transportation costs provides a more comprehensive way of thinking about the cost of housing and true affordability.

Figure 1 shows that, on average, transportation costs are about two-thirds as large as housing costs. However, transportation costs vary greatly across the region. Figure 2 maps H+T affordability.

Figure 2: H+T Costs as a Percent of Income

Transportation Costs:

<table>
<thead>
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<tr>
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<tr>
<td>Average Household</td>
<td>1.79</td>
</tr>
<tr>
<td>Average Household</td>
<td>19,847</td>
</tr>
</tbody>
</table>

2) Center for Neighborhood Technologies, https://www.cnta.org/
Appendix P1. Response to Comments on the Draft EIR

As shown in Figure 3, when both housing and transportation costs are considered, the most affordable areas are in the light-colored areas primarily in the region's core and along major transit corridors. The housing affordability problem cannot be solved by building new housing in the darker-colored areas because high transportation costs make those areas inherently unaffordable. The areas in the more remote locations in San Diego County (i.e., even further from the City center) are not shown in order to make the map more readable, but these areas also tend to be more unaffordable when taking into account H-T.2

Real estate developers and their allies are currently pressuring San Diego County to retain its unlawful and inaccurate thresholds for assessing VMT impacts under SB 743, claiming that mitigation for VMT impacts will make housing in more remote parts of the County unaffordable. But housing in these areas is already unaffordable when transportation costs—i.e., costs of driving long distances from locations not served by transit—are taken into account. SANDAG can help facilitate a better approach through the RTP, one that encourages the County to plan for housing in areas where transportation costs are low rather than allowing developers to build in remote areas and then trying to “mitigate” for the resulting VMT.

The answer to housing affordability is H-T affordability. It is building more housing in the H-T affordable light-colored areas and in expanding the supply of H-T affordable areas through increased transit service.

2Transportation costs—one both in absolute terms and as a percentage of income—are even higher in many North County and East County communities (for example, transportation costs alone range from 25% of income in Alpine and El Cajon to 32% of income in Borrego Springs and 28% of income in Julian and Paako). See: https://sdfriends.org/lost-cheerst/
RESPONSE TO COMMENT 35-20

This comment largely describes positive changes at the State and local level to increase housing supply, which requires no further response. It also inaccurately asserts that all transportation spending can be shifted towards transit and non-motorized infrastructure. There are regulatory constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced. There are also regulatory constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as FTA Section 5307 or RSTP funds are apportioned annually; SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and redirect to transit include funds going to other agencies, such as SHOPP funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.
RESPONSE TO COMMENT 35-21

This comment describes past changes to parking space requirements, and no further response is required.

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**Note:**
- The City of San Diego's share of the total has risen from 54% of the total in the previous cycle to 61% in the new cycle. The City has ample capacity for this housing. It has identified capacity to construct 144,040 housing units at 96,543 more than required. A large percentage of this capacity is in transit corridors.

These are positive changes. However, in the past, the housing allocations have been aspirational but not enforced. The State has signaled that it plans to be more aggressive about enforcement during this cycle. SAMMIS can help the municipalities achieve their housing goals by shifting all transportation spending towards transit and non-motorized (walk and bike) infrastructure. These investments, which will facilitate getting people out of the car, will also help the region increase density without large impacts on neighborhoods.

In addition to personal savings on car ownership (e.g., acquisition, registration, and insurance) and costs associated with driving (e.g., gasoline, replacement parts, and repairs), municipalities are beginning to recognize that neighborhoods served by transit require fewer parking spaces. Last year, the City of San Diego passed a parking reform package that eliminated parking requirements for sites located within

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RESPONSE TO COMMENT 35-22

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

SANDAG cannot confirm the metrics used for the comparison depicted in Figures 5 and 6 in the comment, nor can SANDAG confirm the accuracy of the transit work mode share and commute time data for other metropolitan regions based on the information provided in the comment. For the San Diego region, 3.4 percent of the work trips were made by public transit in 2016 (Final Plan, Table T6.2). With implementation of the proposed Plan, the transit mode share for all work trips increases to 11.7 percent in 2035 and 13.2 percent in 2050.

As for the ratio of average transit commute time to average auto commute time, that ratio is not calculated in the proposed Plan. However, Table T6.3 of the Final Plan includes travel times for transit, auto, and carpool by corridor.

This comment relies upon commute times generated by the CHTS, which presents a less accurate picture of regional behavior and mode share than SANDAG's ABM2+ forecast, for several reasons. The CHTS was conducted by Caltrans between 2010 and 2013 during the Great Recession, which created unique influences on travel behaviors and characteristics. The SANDAG ABM2+ was updated based on the San SDRTS conducted between 2016 and 2017, which used smartphone-based travel diaries as the primary means of travel data collection and included nearly 6,200 participating households. From a data quality perspective, the SDRTS is considered superior to the CHTS based on the more recent time period for survey collection, travel survey data collection methodology, and San Diego region sample size.

Additionally, the CHTS and the SDTRS are limited to travel surveys of residents. However, the ABM2+ forecasts travel for all types of trips—resident, visitor, cross border, airport, non-resident trips starting/ending external to San Diego, commercial, and truck. SANDAG collects supplemental travel survey and data on these other travel markets for inclusion in ABM2+ forecasts. Again, from a data perspective, the ABM2+ forecast is superior to the CHTS numbers referenced in SOFAR's comment.

The proposed Plan includes the Miramar tunnel to support improvements to the Coaster, new commuter rail service, and upgrades to existing light rail service, including grade separations and eliminating...
stops for express service. The proposed Plan also includes a Central Mobility Hub to connect the urban core, the airport, the LOSSAN corridor, the trolley system, and many bus routes.

Specific to express bus service, the proposed Plan includes an expanded network of Rapid buses and improvements to the local bus system to facilitate more frequent and longer spans of service. The Rapid bus network is envisioned to connect to Mobility Hubs, communities, job centers, and other destinations. The infrastructure to support these connections includes better connectivity on city streets, direct access ramps from freeway facilities, plus an assortment of transit operational improvements to facilitate access. By 2035, about 30.4 percent of the region’s population is projected to be living within a half-mile of a Rapid transit stop. For those living further from Rapid transit stops, the proposed Plan investments in Flexible Fleets will allow for more options to facilitate first mile/last mile connections with solutions that can be customized for different communities (microtransit, ridesharing, bikeshare, etc.).

The proposed Plan also includes a land use pattern that focuses growth in Mobility Hub areas to align with transportation investments and facilitate more bikeable and walkable communities. SANDAG is working closely with the City of San Diego to ensure that the proposed Plan complements the City’s efforts to achieve the mode share goals of its Climate Action Plan.
Appendix P1. Response to Comments on the Draft EIR

Those who do commute by transit in the San Diego region suffer an enormous travel time penalty relative to the other large regions in California (Figure 6).

Figure 6: Ratio of Average Transit Commute Time to Average Auto Commute Time

Source: California Household Travel Survey

Improving the regional transit system is not a new idea in the San Diego region; there just has not been enough follow through. Almost a decade ago, SANDAG prepared the Urban Area Transit Strategy ("UATS") as part of its 2011 RTP to connect regional housing needs with transit infrastructure:

The overarching goal of the UATS was to create a world-class transit system for the San Diego region in 2050, with the aim of significantly increasing the attractiveness of transit, walking, and biking in the most urbanized areas of the region.

The vision called for a network of fast, flexible, reliable, safe, and convenient transit services that connect our homes to the region’s major employer-employment centers and destinations. Achievement of this vision would make transit a more appealing option for many trips, reducing the impact of vehicular travel on the environment and on public health. Other key goals included:

- Making transit more time-competitive with automobile travel;
- Maximizing the role of transit within the broader transportation system; and
- Reducing vehicle miles traveled and greenhouse gas emissions in the region (p. TA 7.5).²

² SANDAG, Urban Area Transit Strategy:
The UATS showed a high potential for transit ridership in the region's urban core (Figure 7).

Figure 7: SANDAG Urban Area Transit Study Figure TA 7.8
For transit to become time-competitive with the automobile, the Climate, Housing, Transit Alternative will require much more than a few isolated projects. It will require comprehensive investments at each of the four levels shown in Figure 8:

- Highest speed commuter/intercity rail
- Higher-speed high-frequency transit with separate right-of-way and fewer stops
- Local transit (bus or streetcar) and shared mobility
- Walkable compact land use

At the top level, improving rail service in the Los Angeles to San Diego (“LOS AN”) corridor is a top priority. To this end, an important study by Caltrans and CNHF has just been completed regarding the potential transit ridership on the LOS AN rail corridor between San Diego and Los Angeles. This study arose as a result of litigation filed by CNHF challenging the planned expansion of the I-5 freeway between La Jolla and Oceanside as inconsistent with California’s GHG emission targets. CNHF and Caltrans reached a settlement that focused on the potential to improve rail service on the LOS AN corridor. In particular, the parties agreed to study the feasibility of constructing a double-track rail tunnel through Miramar Hill to facilitate transit on the corridor. The parties believed that the Miramar tunnel could reduce travel times and provide improved connections to local transit services in the University Town Center (UTC) area.

The recently-completed study concludes that the Miramar tunnel and rail line straightening would add a critical link to the LOS AN rail corridor. See Exhibit #1 (Miramar Tunnel Feasibility Study) Critically, it finds that the feasibility criteria for the Miramar tunnel have been satisfied. Its specific findings include the following:

1. The project would increase discretionary passengers by 1,300 to 1,700 per day, thereby reducing annual VMT 300 million to 240 million miles and GHG by 70,000 to 84,000 tons.
2. The project would provide competitive travel times, including a transit system average clock time that is approximately 3% faster than the automobile.
3. The project would be cost competitive, with transit riders cost at $180/month versus automobile costs of $507/month.
4. The project has no fatal engineering flaws.
Appendix P. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 35-23

Appendix D of the proposed Plan includes an induced demand analysis (as required by CARB) to be factored into estimated 2035 greenhouse gas emissions. This analysis utilized the Induced Demand Calculator referenced in the comment.

The study further acknowledges a prior federal study that found construction of the Miramar tunnel along with other corridor improvements would reduce travel time between San Diego and Los Angeles to two hours. In short, construction of the new tunnel, which would provide enhanced access to downtown and the airport, would be a key transportation improvement for the region and the state. As the study notes, the LOSSAN rail corridor—along with the I-5 freeway—is the second-most traveled route in North America. The Miramar tunnel must be considered a key component of the Climate, Housing, Transit Alternative.

At the next level is a network of higher-speed, high frequency transit lines with separate rights of way and fewer stops. In many regions, a light rail service fills this niche, but in the San Diego region the Trolley has not filled this niche well. It operates too slowly and service is not frequent enough. Improvements are needed in both these dimensions. Achieving the required level of service in this higher-speed tier will require a rethinking of the system. As part of the Climate, Housing, Transit Alternative, SANDAG should evaluate spending up the existing lines through grade separations and eliminating stops, as well as creating new higher-speed lines.

Express buses on managed lanes currently do not serve this higher-speed niche well because they connect freeway interchanges instead of land uses. A typical trip using these express buses will be unattractive because it also will involve connecting bus service on one or more circumvent routes. Express buses and managed lanes can work well for some park-and-ride travelers traveling to major destinations but cannot serve a significant portion of the region’s population well.

Both the regional rail and higher-speed high-frequency tiers need to be well connected. The Climate, Housing, Transit Alternative must include an inter-modal terminal (Grand Central) connecting San Diego’s urban core, the Airport, the LOSSAN corridor, the Sprinter corridor, and the Trolley system.

The Climate, Housing, Transit Alternative must also include efficient connections with frequent local buses (which could possibly be automated in the future). To this end, SANDAG must grapple with the first mile/last mile issue as this reflects a failure in land use and the existing transit system. While higher income travelers may have choice of Uber-type services to solve this problem, this should not be viewed as a remedy for the average traveler.

Finally, the goal of a functional transit system is to serve an area complete bike and walkable land use because no trip begins or ends on a transit vehicle. Most transit trips begin and end with a walk trip. In regions with high transit use, there are generally about twice as many walk trips as transit trips. Investments in walk and bike infrastructure should be a top priority. Consistent with the City’s Climate Action Plan, the Climate, Housing, Transit Alternative must model a 50% transit, walk and bike mode share for residents in the central core.

Stop Expanding Freeways

Building a real regional transit network will require all the region’s transportation investment dollars for the foreseeable future. The Climate, Housing, Transit Alternative must not include any freeway expansion.

The billions of dollars spent on freeway expansion the past 20 years have A) failed to reduce congestion, B) caused a substantial increase in VMT and GHG emissions, and C) resulted in a severe housing shortage. The transportation models used to justify these freeway expansion projects have been wrong.
on all counts. These models - both in the San Diego region and in regions throughout the U.S. - forecast
dramatic increases in travel time if freeways are not widened, and substantial increases in travel time even if they are widened. In fact, as shown in Figure 9, travel time has stayed remarkably constant in the U.S.
for decades.

Figure 9: Average Time Driving (minutes per day) 1990-2017 by MSA Population (NHITS)

Source: National Household Travel Survey.

Figure 9 shows the “average time spent driving a private vehicle in a typical day.” There was an increase
during the 1990s, a time when many women were joining the labor force, but since 2000 there has been
little change. Time spent driving also is very similar across differently sized regions. There is evidence
that people have a “travel time budget.” If travel speeds drop, they (on average) will adapt to travel a
shorter distance.

In contrast, if travel speeds increase, people (on average) will travel longer distances. This phenomenon
is known as “induced travel.” In work for the California Air Resources Board (“CARB”), researchers at the
University of California and the University of Southern California reviewed the literature on induced
travel and concluded:

“Thus, the best estimate for the long-run effect of highway capacity on VMT is an
elasticity close to 1.0, implying that in congested metropolitan areas, adding new
capacity to the existing system of limited-access highways is unlikely to reduce congestion or associated GHG in the long run.}\textsuperscript{13}

The SANDAG regional transportation model fails to account properly for induced travel although there are newer algorithms that could address this deficiency.\textsuperscript{17}

Senate Bill 743 establishes VMT as the appropriate metric for determining the impacts of transportation projects. This has made properly accounting for induced VMT critical in the regulatory process. The Office of Planning and Research’s ("OPR") Technical Advisory on Evaluating Transportation Impacts in CEQA recommends:

Whenever employing a travel demand model to assess induced vehicle travel, any limitation or known lack of sensitivity in the analysis that might cause substantial errors in the VMT estimate (for example, model insensitivity to one of the components of induced VMT described above) should be disclosed and characterized, and a description should be provided on how it could influence the analysis results. A discussion of the potential error or bias should be carried into analysis that rely on the VMT analysis, such as greenhouse gas emissions, air quality, energy, and noise.\textsuperscript{18}

The National Center for Sustainable Transportation at the University of California at Davis has produced an Induced Travel Calculator\textsuperscript{19} to help address the deficiencies in the models. Recently, Caltrans also has issued new draft guidance on accounting for induced travel. It recommends following the OPR recommendations:

- Caltrans recommends using the VMT analysis approaches recommended in OPR’s advisory when evaluating the transportation impacts of projects on the State Highway System (SHS).\textsuperscript{20}

Neither expanding freeways nor not expanding freeways will have any effect on regional congestion or average travel times. However, expanding freeways will cause significant increases in VMT and GHG emissions, and will continue to stave the transit system of needed investments.


\textsuperscript{19}https://net.cadi.ucdavis.edu/research/product/induced-travel-calculator

RESPONSE TO COMMENT 35-24

This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR.

This comment inaccurately characterizes the GHG reductions that can be achieved under the proposed Plan network as compared to SOFAR’s proposed Climate, Housing and Transit Alternative. SANDAG modeling data demonstrates that the proposed Climate, Housing and Transit Alternative has similar impacts as the proposed Plan in achieving the State’s GHG reduction goals and does not substantially reduce the proposed Plan’s significant impacts.

<table>
<thead>
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<th>Database</th>
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See Section 6.5.5 of the Draft EIR for additional discussion of reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration.
RESPONSE TO COMMENT 35-25

This conclusory comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. See prior responses to this comment letter for explanations of why the Climate, Housing, Transit Alternative would not achieve the benefits asserted by the commenter, as well as why it was rejected from detailed consideration in the Draft EIR.

SANDAG recognizes that substantial reductions in global, State, and regional GHG emissions are an urgent priority, and strives in its regional plans and programs to do its part in reducing GHG emissions from all sources. EIR Section 4.8.1 properly describes existing conditions related to GHG emissions, including background information on various greenhouse gases, their sources, and their potential to trap heat in the Earth’s atmosphere and contribute to global warming. It describes the main sources of GHG emissions in the state and in the San Diego region. The effects of climate change (“climate destabilization”) are summarized, and a detailed description based on scientific studies of how climate change is anticipated to impact California and the San Diego region is provided in EIR Appendix C. Section 4.8 also describes the regulatory setting for GHG emissions, including descriptions of goals adopted by the Legislature and EOs B-30-15 and S-3-05 goals for statewide GHG reductions. The statewide GHG reduction goals adopted by the Legislature and expressed by the Governor’s EOs are based on limiting global warming to levels necessary to avoid potentially catastrophic climate change impacts.

Duncan McFetridge
Director, CNFF
President, SOFAR

Exhibit #1: Miramar Tunnel Feasibility Study
RESPONSE TO COMMENT 36-1

As noted in the comment, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. Because the specifications of second-tier projects such as the timing, location, and size, associated with implementation of the Plan, are not known at this time, it cannot be concluded with certainty that the mitigation measures identified in the Draft EIR would sufficiently reduce impacts to less-than-significant levels. In addition, many Draft EIR mitigation measures for second-tier projects recognize that agencies other than SANDAG (e.g., local governments, transit districts, and Caltrans) are responsible for implementation, stating that such agencies “can and should” implement them. SANDAG can commit to feasible mitigation measures that are within its responsibility and jurisdiction. However, SANDAG will not be the agency for many of the second-tier projects that implement the proposed Plan. In those instances, SANDAG in its CEQA findings may find that those measures are within the responsibility and jurisdiction of another agency, and that such measures can and should be adopted by such other agency (Guidelines Section 15091(a)(2)).

The Draft EIR also recognizes that due to project or site-specific circumstances it may not be feasible for individual lead agencies to implement all of the “can and should” mitigation measures listed for a particular significant impact. Implementing agencies are required by CEQA to exercise discretion in selecting and imposing mitigation measures based on all relevant feasibility concerns, including costs and available funding, enforcement mechanisms, effectiveness as applied to the specific project in question, and collateral environmental or other effects that may result from implementation of the mitigation measure. How these factors may affect individual mitigation decisions for the many individual projects anticipated in the proposed Plan cannot be realistically assessed in a Program EIR for the entire proposed Plan.

As such, the EIR takes a conservative approach when making significant and unavoidable impact determinations. It does propose all potentially feasible programmatic mitigation measures for significant impact, and
some EIR mitigation measures have been strengthened in response to public comments on the Draft EIR.

RESPONSE TO COMMENT 36-2

Mobility Hubs are meant to be a general geographic area for concentration of future development and travel choices, but that does not mean that the entire area within the Mobility Hub will be developed. During the design of the elements of the Solana Beach Mobility Hub, project-specific biological field surveys and analysis will be conducted that will consider impact avoidance and minimization measures on sensitive biological resources, including southern coastal salt marsh and southern maritime chaparral.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 36-3

As stated in Chapter 2, Project Description, of the Draft EIR, potential locations for Mobility Hubs were identified for communities with a high concentration of people, destinations, and travel choices where densification is envisioned in the SCS, subject to the approval of local jurisdictions. As such, as part of the implementation of the proposed Plan, SANDAG will be working with the staff of the local jurisdictions to define the exact specifications of Mobility Hubs, including location and any other criteria to meet the unique characteristics and reflect the respective community transportation needs of each community. As noted above under Solana Beach 36-1, the significant and unavoidable determinations were based on a conservative approach based on a variety of factors related to determining the feasibility of mitigation measures in this first-tier Program EIR.

2. PROJECT DESCRIPTION – MOBILITY HUBS (Section 2.6.1)

The DEIR (and the Proposed Plan) describe Mobility Hubs as having “coverage areas” of 1, 2, or 4 miles from each node around which they are centered and are further described as “unique to each community based on community characteristics and travel needs.” This uniqueness and stated objective to respect the character, scale and visual qualities of each Mobility Hub, although acknowledged and addressed throughout the DEIR including in Sections 4.1 (Aesthetics and Visual Resources), 4.11 (Land Use) and 4.14 (Population and Housing), is seemingly overlooked inasmuch as the DEIR identifies significant and unavoidable impacts for each of these analyzed resource areas due to the Sustainable Community Strategy’s (SCS) focusing of densification in these Mobility Hubs.

Additionally, Figures 2.35 and 2.36 (as well as Figures 2.30 and 2.21) illustrate the Mobility Hub Network. However, each Mobility Hub is very generally depicted and does not follow any specific geographic, visual or roadway boundaries. It is unclear how these amorphous mobility hub boundaries should be interpreted.

Request: The City requests that SANDAG staff work with City officials and their respective staffs to more clearly define these boundaries and provide more clear exhibits.
Appendix P1. Response to Comments on the Draft EIR

REQUEST TO COMMENT 36-4

Requested edits have been made to Table 4.1-3 to reference policies from Solana Beach’s LCP/LUP regarding scenic quality as well as the Dark Sky Zones ordinance. In addition, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects, including Mobility Hubs. Development of Mobility Hubs that would occur as part of the implementation of the proposed Plan would undergo separate, project-specific environmental review, and any impacts on aesthetic and visual resources, including consistency with CCA policies related to preservation of such resources, would be evaluated and mitigated when the timing, location, and other specifications of a specific project have been defined. Draft EIR Section 4.1.2 describes the CCA policies that apply to coastal development to protect views to and along the ocean and other scenic coastal areas, and edits have been made to mitigation measures AES-2a and AES-2b to address coastal areas more specifically.

3. AESTHETICS AND VISUAL RESOURCES (Section 4.1)

Pages 4.1-9 of the DEIR accurately note that, under the California Coastal Act of 1976, scenic and visual qualities of the coast must be considered and protected as a visual resource. Additionally, page 4.1-10 notes that Section 30251 of the Coastal Act requires that permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas and, where feasible, to restore and enhance the visual quality in visually degraded areas. Solana Beach is located entirely within the Coastal Zone while the entire western half of the City is also identified as a Coastal Mobility Hub in the Proposed Plan and DEIR. Therefore, the objective to focus jobs, housing and densification within this area as contemplated in the DEIR while also complying with the Coastal Act mandate to preserve scenic and visual qualities, protect views of the ocean and require new development to be compatible with the surrounding areas conflict with one another. More pointedly, the Proposed Plan is inconsistent with the Coastal Act in this regard. Not surprisingly, the DEIR determined that the Proposed Plan would, even after mitigation, have a significant and unavoidable impact effect in each of the following areas:

- AES-1 Have a substantial adverse effect on a scenic vista
- AES-2 Substantially damage scenic resources, including but not limited to, trees, rocks, outcroppings and historic structures within a state scenic highway.
- AES-3 Substantially degrade the existing visual character or quality of public views of the site and its surroundings, including adding a visual element of urban character to an existing rural or open space area, conflicting with regulations governing scenic quality.
- AES-4 Substantially degrade the existing visual character or quality of public views of the site and its surroundings by creating a new source of substantial light or glare that would adversely affect day or nighttime views.

This determination points to the significant challenges coastal cities like Solana Beach already face and will continue to face in light of the Coastal Mobility Hub designation in attempting to balance our local needs with both state and regional mandates and policies.

Additionally, Table 4.1-3 of the DEIR lists the Visual Resource Protection Plans and Regulations Governing Scenic Quality in the San Diego Region by Local Jurisdiction. In so doing, however, it fails to include the City’s LCP/LUP Policies (2014) that mandate the protection of visual and scenic resources in compliance with the Coastal Act as well as our local Dark Sky Zones adjacent to the San Elijo Lagoon along the City’s northern boundary and adjacent to the San Dieguito Lagoon at the southeastern boundary of the City.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 36-5

See response to comment Del Mar 13-29. The air quality analysis assumes that all passenger lines will be operating with Tier IV or better engines by 2025. However, both the Coaster and Amtrak Pacific Surfliner lines are operating their full fleet with Tier IV locomotives today, which is ahead of the schedule assumed in the Draft EIR. Both Coaster and Amtrak have retired the older diesel locomotives that were assumed under the EIR’s baseline conditions. Moreover, any new locomotive purchases will be Tier IV or better, in compliance with federal locomotive standards (40 CFR 1033). Also, mitigation measure AQ-2b ensures that all new train purchases shall be zero emission after 2035. The suggested additional analysis and mitigation measure are therefore not required.

RESPONSE TO COMMENT 36-6

The reference to the City’s ESHA Mapping has been added to Table 4.4-6 in the Final EIR. Please also see response to comment Solana Beach 36-2. At the time of implementation of the elements of the Solana Beach Mobility Hub, project-specific biological field surveys and analysis will be conducted as applicable to address impact avoidance and protection of sensitive biological resources, including sensitive habitat.
RESPONSE TO COMMENT 36-7

Table 4.7-3 has been updated with a discussion of policies related to geologic hazards from the Solana Beach LCP/LUP. While the Draft EIR did not individually analyze consistency with all of the local policies of all of the jurisdictions listed in Table 4.7-3, the Draft EIR states that existing federal, State, and local laws, regulations, and programs included in Section 4.7.2 would require each improvement or project to be reviewed by appropriate regulatory agencies prior to construction and would require each improvement or project to adhere to design standards described in the CBC and all standard design, grading, and construction practices to avoid or reduce impacts from geologic hazards. As such, any site-specific transportation network improvements and development projects occurring within Solana Beach would be subject to the policies identified in the City’s LCP/LUP.

RESPONSE TO COMMENT 36-8

The identified sections of the Coastal Act have been added to the Regional and Local Laws, Regulations, Plans, and Policies discussion related to LCPs on Final EIR pages 4.11-12 and 4.11-13. Conflicts with land use plans, policies, or regulations are evaluated in the EIR on a program-level basis. As discussed for Impact LU-2, the forecasted development of the proposed Plan is based on the Series 14 Regional Growth Forecast SCS land use pattern, which is, in turn, based on the adopted general plans of the cities and County of San Diego and on the most recent planning assumptions, considering local general plans and other factors, as required by SB 375 (Government Code Section 65080(b)(2)(B)), including local coastal programs, which are components of local general plans. In a few cases, the SCS land use pattern may conflict with specific land use designations in general plans, but impacts of SCS implementation are already evaluated in other sections of the EIR, so these conflicts would not cause new significant impacts.
Due to the programmatic nature of the EIR analysis, the EIR does not call out specific policies from local jurisdiction’s LCPs/LUPs; thus, the specific Solana Beach LCP/LUP is not specifically called out in the analysis. Consistency of individual second-tier projects with these policies would be considered during project-specific CEQA reviews.
RESPONSE TO COMMENT 36-10

Solana Beach is a major destination due to its commercial and recreational resources for visitors from both outside and within San Diego County. These trip-inducing factors contribute to the area’s high propensity for Regional Mobility Hub designation.

Not all Mobility Hub areas are created equal, and they do not all require construction of a major transit center. Coastal Mobility Hubs in the North County area are envisioned to rely upon some transit services supported by an array of on-demand Flexible Fleets to help people complete short trips in and around the hub without needing to rely on a car. The suite of Flexible Fleets and supporting Mobility Hub amenities as included in the Final EIR can be tailored to meet the needs of people traveling to and within Solana Beach. SANDAG staff will continue to coordinate with Solana Beach on planning for appropriate Mobility Hub services, amenities, and supporting technology for this community.

RESPONSE TO COMMENT 36-11

The text in Table 4.11-5 has been updated to reference the current Housing Element status, as provided in this letter.
Request: Section 4.11 of the DEIR should include a more detailed description and analysis of provisions of the Coastal Act and local LCP Policies that conflict with the Proposed Plan’s stated objective that jobs, housing and densification should be focused in designated Coastal Mobility Hubs. Where conflicts exist, the Proposed Plan should state that provisions of the Coastal Act should prevail.

Please update Table 4.11-5 of the DEIR regarding the status of the City’s Housing Element.

8. 4.13 NOISE AND VIBRATION

The DEIR discusses noise and vibration associated with Phased Transit Leap improvements, which includes double-tracking at certain locations on the LOSSAN rail corridor along with increases in COASTER frequencies. The DEIR states that land uses considered to be sensitive to human annoyance caused by vibration are generally the same as those that would be sensitive to noise.

The City appreciates the analysis of noise and vibration resulting from improvements associated with regional growth and land use changes and transportation network improvements as well as the mitigation measures proposed to address these impacts. Despite this analysis and proposed mitigation, Significant and Unavoidable Impacts After Mitigation are identified in 2025, 2035, and 2050 for noise and vibration impacts (NOI-1 and NOI-2).

The DEIR discusses and analyzes the Generation of Excessive Groundborne Vibration or Groundborne Noise Levels and similarly determines that improvements associated with regional growth and land use changes and transportation network improvements could generate an increase in groundborne noise and vibrations. These impacts are also determined to be Significant and Unavoidable After Mitigation in 2025, 2035, and 2050.

Absent from the analysis, however, is any discussion regarding the potential vibrational impacts to coastal bluffs, inland bluffs and other sensitive landforms through which the newly double-tracked LOSSAN rail corridor and the anticipated increased COASTER services do and will run. Similarly, when combined with the transportation network impacts, new construction activity anticipated within the City’s Coastal Mobility Hub could create more severe groundborne vibration impacts to natural landforms and/or to existing development. The City of Solana Beach is characterized by extensive coastal and inland bluffs that are within close proximity to the LOSSAN corridor. The City routinely experiences coastal erosion and bluff failures that create a public safety hazard. Additionally, most of the City is designated within the proposed Solana Beach Mobility Hub which is intended to be the focus of additional jobs, housing, and densification under the Proposed Plan.

While mitigation measures are proposed to address these impacts, Section 4.13

RESPONSE TO COMMENT 36-12

Requested revisions have been made to Table 4.11-5 in Section 4.11, Land Use, of the Final EIR. In addition, due to the programmatic nature of the EIR analysis, the EIR does not call out specific policies from local jurisdiction’s LCP/LUPs; thus, these specific Solana Beach LCP/LUP items are not specifically called out in the analysis. The EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan, including Mobility Hubs, would be subject to project-specific environmental review and would include project-specific consistency analyses with applicable CCA and LCP policies. Project-design adjustments and mitigation measures would be identified to reduce impacts related to potential conflicts with applicable policies at that time.

RESPONSE TO COMMENT 36-13

Impacts from vibration associated with projects that would occur under the proposed Plan are described under Impact NOI-2 in Section 4.13, Noise and Vibration. The discussion is generic and outlines some of the projects that would occur during the time horizons referenced in the document. This analysis is not meant to clear projects that would require project-level analysis and does not include an exhaustive list of projects as the document is a program-level EIR. The analysis requested by the commenter for the referenced project would be included in the project-level environmental document. Language has been added to Section 4.13 to discuss generally the impacts of vibration-related impacts to coastal and inland bluffs.
RESPONSE TO COMMENT 36-14

The Regulatory Setting in Section 4.14, Population and Housing, discusses federal, State, regional, and local laws, regulations, plans, and policies pertaining to and relevant to the proposed Plan. While it is correct to say that housing legislation in recent years has sought to provide for ministerial housing, which may mean that future CEQA analysis would not occur on each and every specific development project, each jurisdiction has a local entitlement process to follow and specific ordinances, including design measures, that projects would be required to adhere to. Therefore, even for projects that are exempt from CEQA, review at a local level for compliance with the local jurisdiction’s entitlement process and specific local ordinances, including design measures, would still occur. As such, future development occurring as part of the implementation of the proposed Plan would be evaluated at a local level on a project-by-project basis, whether the evaluation occurs as part of the CEQA process or as part of the local entitlement process.

RESPONSE TO COMMENT 36-15

While it is correct to say that housing legislation in recent years has sought to provide for ministerial housing, which may mean that future CEQA analysis would not occur on each and every specific development project, each jurisdiction has a local entitlement process to follow and specific ordinances, including design measures, that projects would be required to adhere to. Therefore, even for projects that are exempt from CEQA, review at a local level for compliance with the local jurisdiction’s entitlement process and specific local ordinances, including design measures, would still occur. As such, aesthetic impacts would be evaluated at a local level on a project-by-project basis, whether the evaluation occurs as part of the CEQA process or as part of the local entitlement process. The EIR does not dismiss aesthetic impacts but acknowledges that impacts would occur on a local level and would be evaluated at a local level on a project-by-project basis.
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1. Response to Comments on the Draft EIR

San Diego Forward: The 2021 Regional Plan

Program Environmental Impact Report

Regarding Request 1, please see responses to comments Solana Beach 36-14 and 36-15. Regarding Request 2, the proposed Plan’s Appendix F, Series 14 Regional Growth Forecast and SCS Land Use Pattern, details the development of the population and job growth projections that are reflected in the Draft EIR. The Series 14 Regional Growth Forecast aligns with the regional population projection from the California Department of Finance (DOF) released in January 2020. The California Department of Housing and Community Development issued the San Diego region’s Regional Housing Needs Assessment Determination on July 5, 2018, and used an earlier version of the DOF population projection.

RESPONSE TO COMMENT 36-17

In general, pedestrian facilities are more focused in localized areas and are not planned at the regional level. Due to its regional focus, the proposed Plan need not provide substantial detail on the pedestrian facilities that currently exist within the region or locally planned improvements to pedestrian networks under future year conditions. Additionally, the proposed Plan does not include any specific pedestrian-related infrastructure; instead, the proposed Plan includes grant funding opportunities for local jurisdictions to plan, design, and construct pedestrian improvements at the local level (see Table A.14 and A.17 of the proposed Plan). Therefore, because the pedestrian infrastructure funded by the proposed Plan will generally be planned, designed, and implemented by local jurisdictions, it has not been identified at this time and could not be summarized or included within the Draft EIR. Finally, it should be noted that subsequent, project-level, CEQA review will be required for the pedestrian infrastructure funded by the proposed Plan prior to such infrastructure’s implementation.

RESPONSE TO COMMENT 36-18

As an initial matter, Request 1 relates to the contents of the proposed Plan, not the adequacy of the analysis within the DEIR. The proposed
Plan aims to create safe and well-connected routes for pedestrians and bicyclists. The intention of the network in the Plan is a framework that facilitates trips associated with regional purposes designed to enhance neighborhood connections to schools, employment centers, and other everyday destinations. At the regional scale, the regional transportation network does not include details regarding the types of bicycle and pedestrian facilities to be included within specific corridor projects, and the analysis of those projects will require future planning and coordination with local jurisdictions, community members, and other stakeholders to determine such details, all of which would be conducted at the project level.

In addition to specific projects and corridors, the Plan includes funding for “Complete Streets in Mobility Hubs,” which will include active transportation improvements on local streets within the hubs that will facilitate these kinds of connections. The intention is to make trips less than 3 miles more attractive for walking and biking. Local jurisdictions also have access to Safe Routes to Schools programs and funding, which can assist with infrastructure, outreach, and other elements. Appendix A of the proposed Plan includes Mobility Hubs and Policies and Programs sections that describe investments that would benefit school sites and school access. Within the Mobility Hub investments, programs aim to make streets safer for people who walk and bike by investing in traffic calming and pedestrian improvements. Under Policies and Programs the proposed Plan includes Vision Zero programming that prioritizes safety through roadway design while working with cities to develop community engagement programs that identify local street safety issues and provide technical guidance to resolve those issues through investment, policies, and programs.

Request 2 states that the Draft EIR should incorporate a mitigation measure to improve pedestrian access along Lomas Santa Fe at the I-5 interchange. The issues described at the east/west direction at the I-5 Interchange, however, describe an existing condition, not an impact of the proposed Plan. This comment is therefore directed towards the content of the proposed Plan, not the adequacy of the EIR’s mitigation measure for the significant impacts caused by the proposed Plan. The comment will be considered by the SANDAG Board of Directors when it considers adoption of the proposed Plan.
The Draft EIR analyzes at a program level the effects of the planned transportation network, and the resulting patterns of land use and development, on a regional basis. The analysis incorporates the population growth projected for the County’s cities and unincorporated areas projected by SANDAG Series 14 statistics. The water supply analysis examines the adequacy of the region’s future water supply assuming future projected population levels. The availability of future water supplies to meet this future demand is assessed using the legally mandated UWMPs prepared by the agencies supplying water to the region, the SDCWA and the MWD. For the SDCWA service area, the EIR does not analyze the water supply of particular geographic areas or jurisdictions; instead, it analyzes the adequacy of supply on a regional basis. It should be noted, however, that the water planning of the SDCWA’s 24 member agencies is incorporated into the SDCWA UWMP. This planning includes both supply and demand.

The proposed Plan designates areas that, due to planned investment in transportation infrastructure and a potential for increased employment and residences, are potential Mobility Hubs. As described in the Chapter 2 of the EIR, Mobility Hubs are proposed for communities with a high concentration of people, destinations, and travel choices where densification is envisioned in the SCS, subject to approval of local jurisdictions. In order for a Mobility Hub to become a reality a very large number of plans and projects would need to be proposed over many years. These plans and projects would be subject to local discretionary review, including review pursuant to CEQA. As part of this plan and project-level review, the adequacy of local water supplies, storage capacity, and conveyance infrastructure would be evaluated. The results of these analyses would determine what water infrastructure investments would be necessary in order for a Mobility Hub to meet its ultimate growth potential in terms of jobs and residences, or if less intensive future development is warranted as a result of limited water supplies or inadequate infrastructure.

RESPONSE TO COMMENT 36-20

The EIR concludes that transportation network improvements and programs associated with the proposed Plan would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildland. Revisions have...
been made to Section 4.19, *Wildfire*, regarding the 2025 (Final EIR page 4.19-21), 2035 (Final EIR page 4.19-24), and 2050 (Final EIR page 4.19-25) as follows:

*Risks would be exacerbated in areas where designated Mobility Hubs, characterized by a higher density of jobs and residences, would develop within and adjacent to VHFSZs.*

Also, please see response to comment Solano Beach 36-19 regarding project-specific review of projects implementing Mobility Hubs; such reviews would consider and mitigate wildfire impacts.
RESPONSE TO COMMENT 36-21

Thank you for your comments on behalf of the City of Solana Beach. SANDAG appreciates Solana Beach’s input on the EIR and the proposed Plan.

Once again, the City of Solana Beach greatly appreciates the opportunity to review and comment on the DEIR. We look forward to coordinating with you further on this and appreciate SANDAG’s consideration of the City’s comments as noted above.

If you have any questions or comments, please feel free to contact Community Development Director Joseph Lin at jlin@sandag.org or 858-720-2454, or me at gjwade@sandag.org or 858-720-2444.

Sincerely,

Gregory Wade
City Manager

Attachment: Draft 2021 Regional Plan Letter dated August 5, 2021

C: Lisa Heebner, City of Solana Beach Mayor and SANDAG Board Member
    David Zilis, City of Solana Beach Council Member and SANDAG Board Alternate
    Joseph Lin, City of Solana Beach Community Development Director
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 36-22

Thank you for providing the City of Solana Beach's letter providing comments on the proposed Plan. Responses to these comments can be found beginning from ID L142 in Appendix P.2.
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uniqueness with respect to jobs, housing and access to high-quality transit and the extent to which each area should be relied upon (or not) to satisfy the region's future growth.

The adopted 2021 Regional Transportation Plan (Adopted Plan) and the SCS should contain a detailed discussion of the five (5) Mobility Hub Areas and a description of the unique characteristics and transit needs for each – both now and in the future.

Additionally, by virtue of the fact that the Solana Beach Train Station is within 2½ miles of the cities of Del Mar, Encinitas and San Diego and the County of San Diego, this regional Coastal Mobility Hub Area in the Adopted Plan should, for purposes of planning for future housing and job growth, extend into and cover the City of Del Mar and the Del Mar Fairgrounds and areas of the cities of Encinitas and San Diego and the County of San Diego immediately adjacent to Solana Beach.

- **Transit Leap Services** – As noted above, the Propensity Analysis discussed in Appendix T for both Transit Leap Services and Mobility Hubs determined that Solana Beach and its Train Station were at the lower end in the region both in meeting the needs of transit riders now and in the future and for suitability as a Mobility Hub. While the City acknowledges that the presence of the Train Station in Solana Beach might make it reasonable to include as a potential future Mobility Hub in the Adopted Plan, during the recent Regional Housing Needs Assessment (RHNA) allocation process, the City also made it clear that, both now and in the near term, the Train Station does not currently provide adequate Coast Star or Amtrak headways, nor does it provide meaningful connections to other transit services to be considered a Mobility Hub now. Indeed, despite the North County Transit District (NCTD) Board recently voting to increase Coast Star service beginning in October 2021, such a designation is still largely aspirational. While, again, the City acknowledges that the Draft Plan and the Adopted Plan are just that – a plan for the future – Appendix A of the Draft Plan – Transportation Projects, Programs, and Phasing – appears to support this position. Table A.5 (Interstate 5 North Coastal Corridor) identifies one Transit Leap project (TL40) – Rapid 473 – for implementation in the year 2035. Similarly, Table A.9 (State Route 56) identifies one Transit Leap project (TL29) – Rapid 103 – for implementation in the year 2050. These 15 to 30-year forward-looking Transit Leap projects, while helpful for the future, do not appear to satisfy the near-term objectives of a Coastal Mobility Hub.

In order to justify the designation of the Solana Beach Train Station as a Coastal Mobility Hub, both now and in the future, more immediate Transit Leap service connections should be considered for inclusion in the Adopted Plan.
Appendix B: Implementation Actions — Appendix B provides detail on commitments and key actions to implement elements and strategies of the Draft Plan. Key to this objective is the involvement of and coordination with each member agency as they are most knowledgeable of the needs of their respective communities. Indeed, Near-term Implementation Action No. 2 in Table B.1 identifies the need to partner with local governments to develop five initial Comprehensive Multimodal Corridor Plans (CMCPs). Therefore, the City requests that the following minor edits to Appendix B (page 19) under “Land Use and Regional Growth” be included:

“The 2021 Regional Plan vision for land use focuses on development and growth in Mobility Hub areas, urbanized areas near jobs, to preserve San Diego’s open space and support transportation investments by reducing vehicle miles traveled (VMT). Mobility Hubs are seen as an opportunity to provide housing to address the Regional Housing Needs Assessment. Land use authority is reserved to local jurisdictions because they are best positioned to effectively implement the objectives outlined in the 2021 Regional Plan through understanding of the unique needs of their communities and geographies. Because land use authority is reserved to local jurisdictions, SANDAG will leverage partnerships with cities and the county through the Smart Growth Incentive Program and other grants to provide funds for transportation-related improvements and planning efforts that support smart growth in Mobility Hubs to realize the vision for their communities. SANDAG will continue its existing grant programs, partner with member agencies on state funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the 2021 Regional Plan.”

Regional Housing Needs Assessment — Following adoption of the Draft RHNA allocation by the SANDAG Board in September 2020, appeals of the allocation were filed by the cities of Coronado, Imperial Beach, Lemon Grove, and Solana Beach. In order that these appeals are correctly noted for the record, there are two locations in the Draft Plan to which a clarifying footnote and additional language should be added to the Adopted Plan. Specifically, the City requests the following for the Adopted Plan: 

- On page 33 of the Draft Plan, after the sentence: “The SANDAG Board of Directors adopted the RHNA Plan on July 10, 2020, with the final housing unit allocation” the following footnote should be added:

* In September 2020, the cities of Coronado, Imperial Beach, Lemon Grove and Solana Beach filed a Petition for Writ of Mandate in San Diego Superior Court challenging, among other things, the Board’s adoption of the RHNA Plan. SANDAG demurred to the cities’ Petition and the demurrer was sustained by the court in February 2021. The petitioning cities have
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appealed the ruling on the demuror to their Writ Petition, and that appeal remains pending in the Fourth District Court of Appeal.

On page 14 of Appendix K (Regional Housing Needs Assessment Plan), the following paragraph should be added to the end of this page/section:

On September 24, 2020, the cities of Coronado, Imperial Beach, Lemon Grove and Solana Beach filed a Petition for Writ of Mandate in San Diego Superior Court. Case No. 3T-2020-0003974-CV-MC-CTL against SANDAG and SANDAG’s Board of Directors seeking an order requiring that SANDAG give those cities a fair hearing on their RHNA appeals and decide the cities’ appeals in a timely manner without bias and without the use of the weighted voting mechanism. Specifically, the petitioning cities asked the court to order: (1) that the-final RHNA allocation approval by SANDAG be rescinded; (2) that SANDAG’s denial of the cities’ RHNA appeals be rescinded; (3) that the appeals be remanded to SANDAG for fair consideration; and (4) that SANDAG be prohibited from utilizing a weighted vote on the cities’ RHNA appeals. On February 5, 2021, SANDAG’s demuror to the Petition for Writ of Mandate was sustained by the Superior Court. The petitioning cities have appealed the ruling on the demuror to the Writ Petition. That appeal remains pending in the Fourth District Court of Appeal. So long as the litigation is pending, the Board’s adoption of the RHNA Plan cannot be considered final.

Once again, the City of Solana Beach greatly appreciates the opportunity to review and comment on the Draft Plan. We also appreciate SANDAG’s consideration of our comments and requested changes for inclusion in the Adopted Plan as noted above.

If you have any questions or comments, please feel free to contact Community Development Director Joseph Lim at lim@ccsb.org or 858-720-2434 or me at sanella@ccsb.org or 858-720-3444.

Sincerely,

[Signature]

Gregory Wade
City Manager

C: Less Heebner, City of Solana Beach Mayor and SANDAG Board Member
   David Zilco, City of Solana Beach Council Member and SANDAG Board Alternate
   Joseph Lim, City of Solana Beach Community Development Director
COMMENT LETTER 37: SOUTHWEST WETLANDS INTERPRETIVE ASSOCIATION

RESPONSE TO COMMENT 37-1

Thank you for your comment on behalf of the Southwest Wetlands Interpretive Association (SWIA). SANDAG appreciates SWIA’s proposal regarding a framework for a new alternative. Please refer to response to comment SWIA 37-11 for further elaboration regarding this comment.
RESPONSE TO COMMENT 37-2

SANDAG appreciates SWIA’s overall support for the Plan. Please refer to the responses to comments below for further discussion.

RESPONSE TO COMMENT 37-3

Regarding significant and unavoidable impacts, the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. Many Draft EIR mitigation measures for second-tier projects, recognizing that agencies other than SANDAG (e.g., local governments, transit districts, and Caltrans) are responsible for implementation, state that such agencies “can and should” implement the measures. See Master Response 2 for further discussion of these mitigation measures.

SANDAG can commit to feasible mitigation measures that are within its responsibility and jurisdiction. However, SANDAG will not be the lead agency for many of the second-tier projects that implement the proposed Plan. In those instances, SANDAG in its CEQA findings may find that those measures are within the responsibility and jurisdiction of another agency, and that such measures can and should be adopted by such other agency (Guidelines Section 15091(a)(2)).

The Draft EIR also recognizes that due to project- or site-specific circumstances, it may not be feasible for individual lead agencies to implement all of the “can and should” mitigation measures listed for a particular significant impact. Implementing agencies are required by CEQA to exercise discretion in selecting and imposing mitigation measures based on all relevant feasibility concerns, including costs and available funding, enforcement mechanisms, effectiveness as applied to the specific project in question, and collateral environmental or other effects that may result from implementation of the mitigation measure. How these factors may affect individual mitigation decisions for the many individual projects anticipated in the proposed Plan cannot be realistically assessed in a program EIR for the entire Plan.

As such, the EIR takes a conservative approach when making significant and unavoidable impact determinations. Further elaboration regarding specific comments is provided below.
RESPONSE TO COMMENT 37-4

As an initial matter, this comment relates to the content of the proposed Plan, not the DRAFT EIR. The proposed Plan significantly reduces per capita VMT; however, total VMT increases through the life of the proposed Plan. VMT growth is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the proposed transportation network improvements and programs in the proposed Plan would help to reduce VMT growth. That said, the increase in VMT, from baseline Year 2016 conditions, was identified as a significant impact under Threshold TRA-2 in the EIR.

The proposed Plan exceeds the SB 375 target of 19 percent reductions of GHG by 2035 and the Board Resolution for a 30 percent reduction of GHG emissions from all on-road transportation by 2035. However, the proposed Plan’s GHG emissions would be inconsistent with the State’s ability to achieve the goals of EO B-55-18 and EO S-3-05. As discussed in additional detail in Section 4.8.4 in the EIR, mitigation measures would help reduce regional GHG emissions by reducing VMT, increasing use of zero-emission fuels, sequestering carbon from the atmosphere, and other measures; they would reduce inconsistency of the proposed Plan’s GHG emissions with the State’s ability to achieve the SB 32, EO B-55-18, and EO S-3-05 GHG reduction goals. However, full implementation of the changes required to achieve these goals is beyond SANDAG’s and local agencies’ current jurisdiction and authority. As such, they were identified as significant and unavoidable.

While the proposed Plan results in significant impacts related to VMT and GHG, anticipated reductions in per capita VMT and GHG, along with proposed mitigation measures, would reduce inconsistency of the proposed Plan with the State’s ability to achieve VMT and GHG goals, and puts SANDAG on a trajectory that more closely aligns with regulatory targets.

RESPONSE TO COMMENT 37-5

SB 375 language is quoted accurately, and SB 375 does not require regional planning agencies like SANDAG to guarantee emissions reduction targets will be met, so no change to the DRAFT EIR is warranted. That being said, GHG reductions necessary to meet State targets are expected to be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and
stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone. Therefore, while it is SANDAG’s intention to follow through with this plan in an attempt to ensure that regional GHG emissions reductions targets are met, due to the scope of the efforts, it would not require to commit in certainty.

A better transportation system that is less reliant on the automobile is a fundamental component of the proposed Plan. The investments in Managed Lanes will support high speed transit service to ensure time competitive trips as compared to automobile use. The proposed Plan places emphasis on maximizing the use of existing facilities to add corridor capacity to ease congestion while also trying to meet State and federal GHG and air quality targets. The proposed Managed Lanes network uses existing infrastructure by repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools, and low-emission vehicles with appropriate decals. The system of Managed Lanes and supporting connectors support Transit Leap, Flexible Fleets, and HOVs to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. The Regional Plan is updated every 4 years, providing opportunities to reflect changes in the network in the future.
**RESPONSE TO COMMENT 37-6**

SANDAG is required to analyze induced demand impacts of the proposed Plan, which are documented in Appendix D of the proposed Plan. The activity-based model and other analyses used to inform the proposed Plan have been through SANDAG’s peer review process and are documented in the technical methodology submitted to CARB, which is also included in Appendix D. Where possible, the proposed Plan proposes repurposing shoulders and general purpose lanes to offer priority access to transit, carpools, vanpools and low-emission vehicles with appropriate decals. The system of managed lanes and supporting connectors support Transit Leap and high occupancy vehicles to create a seamless systemwide network that will provide people with transportation options, reducing the need to add new highways or general purpose lanes. As such, investment in managed lanes would be beneficial to transit usage. It would not shift investment from additional transit projects and advancing transit options is not feasible because, as discussed in Master Response 1, the request to switch funding from roadways to transit fails to recognize that there are regulatory constraints on directing roadway funds to transit, and on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much funding cannot be advanced.

SANDAG also is currently working with the Social Equity Working Group to develop near-term solutions to address transit service improvements, amenities, and subsidized transit fares. Appendix U, Cost Estimation Methodology, Table U.2, in the proposed Plan, captures the transit fare subsidies to riders throughout FY2026–FY2050. For more information on the Value Pricing and User Fee Implementation and the Regional Fare Impact Study, please see Appendices B and U of the proposed Plan.

The Regional Plan and its SCS are iterative planning documents that are typically updated every 4 years to account for new data, analysis, policy, and experience.

**RESPONSE TO COMMENT 37-7**

The deployment of Flexible Fleets such as e-bikes, shuttles, or ridesharing is envisioned as part of the proposed Plan to provide convenient and affordable options in different communities. SANDAG is developing a Flexible Fleet Implementation Strategic Plan to identify...
near-term opportunities for Flexible Fleet pilots that support mobility, equity, and sustainability goals.

**RESPONSE TO COMMENT 37-8**

Please see Master Response 1 explaining why this type of alternative was not considered in detail in the EIR.

SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors in advance of approval of the proposed Plan to amend the agency budget and act now to invest in transit that benefits environmental justice communities.

This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, in addition to providing fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, has been added to Appendix A in the Final Plan.

The proposed Plan includes increased service spans for the trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.
RESPONSE TO COMMENT 37-9
Please refer to Master Response 1 for explanation regarding why this element was not considered in detail in the alternatives.

RESPONSE TO COMMENT 37-10
Please refer to Master Response 1 for discussions regarding including a regional habitat conservation fund in the alternatives.

As a related concern, the EIR does not adequately address an issue that was raised many times during the Plan's preparation. More clear and definitive mechanisms are needed in the Plan to ensure that its actions - particularly those that rely upon the local jurisdictions for land use zoning, development, and other supportive actions - are implemented (and monitored and corrected/adjusted, as necessary) in accordance with the Plan's expectations. The metrics for monitoring Plan implementation must be more specific; for example, are the locations and numbers of future population, jobs and housing developments (units) in accord with the Plan (i.e., meeting the expected allocations in the mobility hubs/smart growth areas) by the time periods (e.g., annual increases consistent with the RHNA), are the primary transportation route improvements being constructed on the anticipated timelines and matching with the new development/growth, etc. Those and other monitoring parameters must be collected, analyzed and reported on a timely (annual or at least biannual) basis and corrective measures undertaken when/where necessary.

The potential impacts from implementing the Plan while population, housing, and job growth are not aligning with the transportation infrastructure would be a potentially fatal flaw unless the Plan incorporates new mechanisms - that are agreed-to by the jurisdictions per formal agreements - to ensure conformance.

**Biology:** The EIR acknowledges potentially significant and unavoidable impacts to biological resources, including to wetlands, sensitive species, and movement corridors/wildlife connectivity. Pages 4.4-61 to 79 describe the substantial adverse effects on riparian habitat, wetlands and other sensitive natural habitats, their potential significance, and possible mitigation for unavoidable impacts. Pages 4.4-79 to 95 describe the proposed Plan's anticipated impacts to sensitive and rare, threatened and endangered species, their potential significance, and possible mitigation for unavoidable impacts. Pages 4.4-95 to 105 present comparable descriptions of the anticipated impacts to corridors and linkages that are essential to the continued survival of wildlife (and plants), their potential significance, and possible mitigation for unavoidable impacts. We concur with the analyses and findings that, even with mitigation, those potential impacts affect to all of these biological resources would be significant (and unavoidable). It is particularly important to highlight that SANDAG has no land use authority, so it cannot ensure that the impacts from land use/development - and climate change effects - will not be greater than what was assumed and analyzed. For those reasons, we strongly recommend adding a funding mitigation measure that would provide the region's extant - and future - preserved conservation lands (i.e., not just the project-specific mitigation lands) sufficient regional habitat conservation funding to address unanticipated impacts to rare, threatened and endangered species from growth/development and associated climate change effects.
RESPONSE TO COMMENT 37-11

The comment asserts that the range of alternatives evaluated in the EIR does not meet CEQA’s requirement to evaluate a reasonable range of potentially feasible alternatives because the EIR does not include an alternative that:

- Prioritizes transit/active transit over Managed Lanes
- Institutes a much more rigorous monitoring system of the transportation system’s buildout and performance
- Adds a regional habitat conservation fund; and
- Ensures enforcement of the jurisdictions’ compliance with the Plan.

Please see Master Response 1 explaining why this type of alternative was not considered in detail in the EIR.

Our contact for this comment letter is Bill Tippets (btippets@gmail.com or 619-822-4323), who is available to discuss it with SANDAG.

Sincerely,

Mike McCoy
President

BRI Tippets
Board Member

Cc: SWMA Board
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 38-1
Thank you for the U.S. Fish and Wildlife Service’s (USFWS) review of the Draft EIR and participation in the environmental review process. Detailed responses to USFWS’ comments are provided in subsequent discussions below.

RESPONSE TO COMMENT 38-2
The summary of the proposed project description is acknowledged.
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 38-3

As an initial matter, this comment relates to the content of the proposed Plan, not the Draft EIR.

Appendix AA of the proposed Plan describes the history and status of the HCPs within the region. Each local jurisdiction that signed an Implementing Agreement for their HCP was granted "take" authorization for impacts on endangered and threatened species. The local jurisdiction's commitment was to fund the local costs for acquisitions, management, and monitoring. Funds to cover these local costs will be raised on a regional or plan area basis as outlined in the Implementing Agreements.

The transportation network and the land use pattern proposed in the SCS do not impact the ability of the local jurisdictions to seek a regional funding source, and therefore there is no impact under CEQA and no required mitigation. SANDAG will continue its existing grant programs, partner with member agencies on State funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the proposed Plan. To meet the region's habitat conservation goals, the proposed Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B of the proposed Plan), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B of the proposed Plan and mitigation measure GHG-5c in Section 4.8 of the EIR), and $300 to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A of the proposed Plan).
Appendix P1. Response to Comments on the Draft EIR

RESPONSE TO COMMENT 38-4

The EIR addresses draft NCCP Subarea Plans and any updates to these plans when the respective jurisdiction implements the Draft Subarea Plan through ordinances, planning guidelines, or local directives, or when there are signed agreements between the jurisdiction and the Wildlife Agencies (i.e., for the North County and East County MSCPs). However, the CEQA analysis only considers adopted HCPs pursuant to CEQA guidance (see CEQA Guidelines question IV.e and Section 15125(d)(e)) and the criteria identified in the EIR. The word "approved" has been changed to "adopted" throughout the document when referencing NCCPs and HCPs. (See Chaparral Greens v. City of Chula Vista (1996) 50 Cal.App.4th 1134.)

RESPONSE TO COMMENT 38-5

The tolling lanes and Managed Lanes included in the proposed Plan were coded into SANDAG's ABM2+, which was the main tool used to conduct the VMT analysis and identify VMT-related impacts under Threshold TRA-2. As such, the effects of the proposed tolling lanes and Managed Lanes were accounted for in the VMT impact analysis of the proposed Plan, as shown in Tables 4.16-6, 4.16-10, and 4.16-14. Please note that the Draft EIR provides a programmatic analysis of the proposed Plan and is only intended to evaluate the impacts of the proposed Plan as a whole. The Draft EIR does not analyze the effect of individual improvements or specific changes to the region's transportation network and/or land uses patterns. Subsequent project-level CEQA analysis will be required to isolate and identify the impacts associated with the individual components of the proposed Plan prior to their implementation.

It should be noted that measure RTP-1 of the California Air Pollution Control Officers Association (CAPCOA) Quantifying Green House Gas Mitigation Measures, August 2010 identifies that the implementation of cordon pricing and/or tolling to get in and out of central business districts can reduce VMT by a magnitude of 7.9–22.0 percent. The determination of the specific percentage can vary from location to location based on factors such as pricing levels and the associated levels of congestion. As noted previously, this level of analysis was included within the ABM2+ results and was therefore accounted for within the
VMT analysis conducted for the proposed Plan; however, the VMT reductions were not calculated for individual facilities.

Finally, as identified under Threshold TRA-2, implementation of the proposed Plan will result in a conflict and/or is inconsistent with CEQA Guidelines Section 15064.3 by not achieving the substantial VMT reductions needed to help achieve statewide GHG reduction goals. As such, the Draft EIR discloses that implementation of the proposed tolling lanes and Managed Lanes, in conjunction with the implementation of rest of the proposed Plan, would result in a significant impact.

RESPONSE TO COMMENT 38-6

The references to the Otay Ranch and Quino checkerspot amendments have been removed from the Final EIR.

RESPONSE TO COMMENT 38-7

The EIR is a programmatic document that assesses projects on a large scale. Threshold BIO-3 in Section 4.4, Biological Resources, addresses impacts on wildlife movement corridors on a programmatic level based on best available data. The implementation of projects under the proposed Plan will require subsequent CEQA review, and the effects of an individual project on wildlife movement corridors, including the potential for habitat fragmentation, will be analyzed in the project-specific CEQA document.

RESPONSE TO COMMENT 38-8

The California High Speed Rail project has been added to Appendix A of the proposed Plan, and SANDAG will track its progress as it is developed by the State; however, it is not a project that would be designed or constructed by SANDAG or other entities within the region. Regarding specific project-level impacts (e.g., Commuter Rail), the proposed Plan is a high-level, programmatic document. Specific details regarding impacts and mitigation are not known at this time but will be covered when future projects go through project-level environmental review.
RESPONSE TO COMMENT 38-9

Regarding specific project-level impacts (e.g., Commuter Rail), the proposed Plan is a high-level, programmatic document. Specific details regarding impacts and mitigation are not known at this time but will be covered when future projects go through project-level environmental review.

RESPONSE TO COMMENT 38-10

The inclusion of the Miramar Tunnel is intended as a replacement of the Miramar Curve to meet future transit needs. Future use of the Miramar Curve corridor is unknown but not assumed as part of the alignment of future proposed Plan transit projects.

RESPONSE TO COMMENT 38-11

Specific details regarding the review of project alternatives, impacts, and mitigation of those impacts are not known at this time but will be covered when the tunnel alignment alternatives go through project-level environmental review.

RESPONSE TO COMMENT 38-12

The MHCP cores and linkages map has been added to Figure 4.4-16 of the Final EIR.

The Santa Ana-Palomar linkage across I-15 is also included in Figure 4.4-15 (species-specific linkage) as part of the model prepared by Jennings et al. (2020).

No GIS data exist yet for the potential Jacumba-Sierra Juarez linkage. This linkage was identified in concept by South Coast Wildlands (SCW) and The Nature Conservancy (TNC), but was never modeled. TNC is planning to model this linkage in the future as part of their Las Californias Binational Conservation effort. The model developed by Jennings et al. (2020) includes the U.S. side of the Jacumba-Sierra Juarez linkage, which is included in Figure 4.4-15 of the EIR.
RESPONSE TO COMMENT 38-13
The text has been revised as suggested; the third sentence in the paragraph starting with “In March 2021” has been removed from the Final EIR.

RESPONSE TO COMMENT 38-14
Table 4.4-5 has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 38-15
Figure 4.4-16 has been revised as suggested in the Final EIR.

RESPONSE TO COMMENT 38-16
The text has been revised as suggested in the Final EIR.
RESPONSE TO COMMENT 38-17

The text has been revised. The following footnote has been added on Page 4.4-62:

The term “conserved” reflects the projected conservation of habitats and biological resources as identified in the HCPs. Hard-line preserves cannot be developed and impacts will be avoided. When allowed development occurs in other preserve dedications such as the PAMA, FPA, or MHPA, the conservation component required by the respective HCP will be implemented through the dedication of conservation easements or other site protection instruments that require the conservation, management, and monitoring of the conserved resources in perpetuity.

RESPONSE TO COMMENT 38-18

The impacts on marshes (including coastal salt marsh) occur due to land use changes as a result of regional land use changes rather than specific projects. Specifically in the City of National City, the programmatic proposed Plan footprint shows commercial development that may affect the Sweetwater and E-Street marshes. However, this is due to the programmatic nature of the footprint, which shows an approximate impact area rather than a project-specific footprint, because the project designs have not yet been developed. Project design, impact avoidance and minimization measures, and subsequent CEQA analysis will consider avoidance or mitigation of any impacts on conserved lands, sensitive coastal salt marsh habitat, and special-status species.

RESPONSE TO COMMENT 38-19

The County of San Diego requires mitigation for the vegetation communities included in the collapsed categories of desert dunes, desert scrub, and forest/woodland. Because all vegetation communities in Tables 4.4-7 through 4.4-9 are sensitive, in the Final EIR, the word “sensitive” has been added to vegetation communities in the table titles, and asterisks and footnotes have been removed. Any impacts on these vegetation communities would be offset based on the County's Report Format and Content Requirements for Biological Resources (2010) mitigation ratios.
RESPONSE TO COMMENT 38-20
This comment addresses the proposed Plan and is not related to the adequacy of the Draft EIR. The SCS Land Use Pattern does not contemplate new residential development in the Warner Springs area. The area identified by the comment in and around Warner Springs contains one parcel with 15 sub-parcels. The assignment of the land use type is based on the logic of the forecast model to roll unique sub-parcel based land uses to the predominant land use at the parcel level. In this case, commercial and office use (Resort) was assigned to one of the sub-parcels, and Spaced Rural Residential was assigned to 14 sub-parcels based on the County’s General Plan where these sub-parcels were designated under “Rural Lands RL-80.” While the land use designation changed, no new housing units are projected for this area in the SCS Land Use Pattern.

RESPONSE TO COMMENT 38-21
As discussed in Chapter 4, the proposed Plan has a baseline of 2016, which is 2 years older than would be typical in past Regional Plan EIRs. In general, physical conditions as they existed in 2016 are used as the baseline for the impact analysis of this EIR, corresponding with the release of the NOP on November 14, 2016, and the start of EIR preparation. Therefore, SR 11 is included in analysis of this EIR because it was part of the 2016 baseline. The EIR provides a programmatic analysis; the CEQA document prepared for SR 11 provides more in-depth, project-specific analysis of the project’s impacts and mitigation measures.

RESPONSE TO COMMENT 38-22
The following text has been added to the Final EIR on page 4.4-79:

The management plans can and should be consistent with the SDMMP MSP (SDMMP 2017), and describe management in perpetuity....

RESPONSE TO COMMENT 38-23
Modeled habitat for sensitive species has been added to and included in the analysis in the Final EIR, and has also been added to EIR Appendix E-7, Table E-7-6.
RESPONSE TO COMMENT 38-24

Please see response to comment USFWS 38-4.

Reference to the County’s Resource Protection Ordinance has been added to mitigation measures BIO-2b and BIO-2c in the Final EIR.
RESPONSE TO COMMENT 38-25

Solar and wind power developments are future land uses to be approved by the local jurisdictions and would be addressed on a project-specific CEQA level; project-specific analysis would evaluate impacts on wildlife movement corridors and consistency with Habitat Conservation Programs and Plans.

RESPONSE TO COMMENT 38-26

Wildlife Movement Corridors and Linkages were identified in the umbrella MSCP and MHCP documents and were adopted by the subarea plans; ergo, the subarea plan cores and linkages are the same as those identified in the umbrella documents. Table 4.4-15 has been revised to add the MHCP core and linkage areas (BCLA) in the Final EIR.

RESPONSE TO COMMENT 38-27

The permitted jurisdictions with preserves that were not included in the South County MSCP and City of San Diego MHPA, the MHCP (FPA/BCLA) and Chula Vista MSCP Preserves, have been added to Tables 4.4-16, 4.4-17, and 4.4-18. The other approved jurisdiction’s preserve designs were captured by the MSCP preserves. Because the EIR only addresses approved NCCPs (see response to comment USFWS 38-4), the Draft North and East County MSCPs are not evaluated in this document.

RESPONSE TO COMMENT 38-28

Appendix E-4 of the EIR has been revised to remove the Vernal Pool HCP since it has been approved. Please also see response to comment USFWS 38-4.
Appendix P1. Response to Comments on the Draft EIR

Kirsten Uchitel (FWS-SDO-2210003-22CPA0003) 8

LITERATURE CITED


COMMENT LETTER 39: KARIN ZIRK

From: "Karin Zirk, Ph.D." <me@karinzirk.com>
Date: October 13, 2021 at 10:27:19 AM PDT
To: Denise Friedman <dfriedman@sandag.org>, delfriedman@sanmail.com
Subject: RE: Comment Save Marian Bear Park
Reply-To: me@karinzirk.com

SANDAG is proposing increasing the number of lands on Hwy 52 which will gobble up some of Marian Bear Park. Plus they want to have designated carpool connector lanes from I-5 and I-805 to Hwy 52 which will further encroach on the park and end up destroying more oaks, sycamores and upland habitat.

You can find the petition at https://www.change.org/p/save-marian-bear-park

Warmly,

Karin Zirk, Ph.D. (she/her/hers)
Executive Director
Friends of Rose Creek
*** Connecting Our Communities ***
http://www.save Rose creek.org

RESPONSE TO COMMENT 39-1

This is a comment on the content of the proposed Plan, and does not raise issues on the adequacy of the Draft EIR. The impacts of the proposed Plan on recreational facilities are discussed in Section 4.15 of the EIR.

The proposed Plan includes freeway improvements along I-5 and implementation of the Coastal Rail Trail in this area for the 2035 horizon. In addition, the SR 52 bikeway from I-5 to Santo Road would impact Marian Bear Memorial Park. Although SANDAG appreciates the concerns expressed in this comment, the improvements are required to accommodate planned population growth and related transportation improvements identified in the proposed Plan.

The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document, including the implementation of mitigation measures identified in Section 4A, Biological Resources, of the EIR.

RESPONSE TO COMMENT 39-2

Please see response to comment Zirk 39-1 above. The implementation of projects under the proposed Plan will require subsequent CEQA review, and the project-specific impacts and mitigation measures will be identified in that subsequent CEQA document.
COMMENT LETTER 40: UNIDENTIFIED WEB COMMENT

RESPONSE TO COMMENT 40-1

As the Draft EIR explains (page 6-1), SANDAG considered public input provided during the EIR scoping process, and used this input to develop the reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, and VMT. The alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested.

As of July 2021, the State has yet to develop or adopt an overarching plan that provides the framework for how California will achieve carbon neutrality by 2045. It is anticipated that achieving this goal would require a combination of GHG emissions reduction and GHG emissions removal strategies; however, it is unknown at this time what combination of reduction and removal strategies will be pursued in California to achieve this goal.

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

SANDAG has direct responsibility for planning for achieving passenger vehicle GHG reduction targets through the development and implementation of an SCS pursuant to SB 375. The proposed Plan includes an SCS and demonstrates that, if the proposed Plan is implemented, the San Diego region would achieve its SB 375 target for 2035. Analysis performed by SANDAG and included in the SCS documentation for the proposed Plan demonstrates that the San Diego region has achieved its SB 375 target for 2020 (Appendix H of this EIR).

In addition, the proposed Plan incorporates several demand management strategies such as teleworking, private pooling programs, vanpool programs, carshare programs, and transit fare subsidies. The land use strategy in the proposed Plan consists of the SCS land use pattern, which considers jobs-housing balance, mixing of uses, and...
transit-oriented development. Please see Section 4.8 for more information about these strategies.

Please see Master Response 1 for further explanations why the EIR did not consider a "net zero emissions alternative" in detail. Similar reasons explain why an alternative that maximizes GHG emission reductions using expected levels of funding was not considered in detail.

**RESPONSE TO COMMENT 40-2**

SANDAG’s ABM2+ estimates the mode shift performance of the proposed plan. The mode share estimates from ABM2+ are reported for the entire region.

Data on mode share is provide in Appendix T, Table T6.2 of the proposed Plan. Other agencies’ mode share targets are specific to their plans. For the City of San Diego, the City’s climate action plan acknowledges that additional strategies must be implemented in addition to the proposed Plan to achieve the City’s mode share targets.

Section 4.16, *Transportation*, discussed mode share. Because the proposed Plan identifies and proposes transportation network improvements at a regional level, plan consistency was reviewed against other regional plans and policies. (Draft EIR page 4.16-30.) Consistency with specific local plans regarding mode share targets would be done on a project level.
COMMENT LETTER 41: UNIDENTIFIED WEB COMMENT

Response to Comment 41-1

Thank you for your comments and consideration of the proposed Plan. This comment does not appear to be a comment about the content or analysis of the Draft EIR or the proposed Plan, and as such, no response is required. However, please see Section 4.8, *Greenhouse Gas Emissions*, for more information about greenhouse gases and the proposed Plan.

Electric vehicles and battery power have destroyed more trees, rainforests and jungles than any used resource used for power.
Thank you for your comments and consideration of the proposed Plan. This Plan has been carefully researched and tailored to be specific to the unique challenges, land uses, resources and communities of the San Diego region.

As an initial matter, this comment relates to the contents of the proposed Plan, not the analysis within the Draft EIR.

Regarding “new routing,” the EIR prepared for the proposed Plan is a first-tier Program EIR. “Second-tier projects” that would implement the proposed Plan include site-specific transportation network improvements and development projects. For subsequent project activities, a site-specific environmental review would be the responsibility of the implementing agency prior to project implementation.

The Vision of the proposed Plan is “A fast, fair, and clean transportation system and a resilient region.” The proposed Plan sets three primary goals to achieve this Vision:

- The efficient movement of people and goods.
- Access to affordable, reliable, and safe mobility options.
- Healthier air and reduced GHG.

The general concept for the proposed Plan was informed significantly by early work on the 2019 Regional Plan, which led to the 2019 Federal RTP. This work included a four-phased approach: concept development, network development, network refinement, and transportation system validation. Additional information about the four phases can be found in Appendix T of the proposed Plan.

Based on regional travel data, SANDAG identified critical regional nodes for travel connections for trips taken to and from the top 15 employment centers in San Diego County. See Section 2.2.1, Development of the Proposed Plan: A Data Driven Process, of this EIR for more information about these areas and elements.

In addition, the proposed Plan incorporates several demand management strategies such as teleworking, private pooling programs, vanpool programs, carshare programs, and transit fare subsidies. The land use strategy in the proposed Plan consists of the SCS land use
pattern, which considers jobs-housing balance, mixing of uses, and
transit-oriented development. Please see Section 4.8 for more
information about these strategies.

SANDAG will launch a study in the next year to further study the
potential of usage-based fees and their capabilities in addressing
various goals, including equity and GHG emissions reduction. The initial
phase of this study will focus on calculating the true cost of driving, and
better understanding what sources of existing revenue are funding
different parts of the system and how different populations are
impacted by existing revenue mechanisms. This foundational
understanding will help SANDAG to design a road usage charge
program that is more fair than current transportation funding sources.
The study will also assess the potential impacts of user fees on San
Diego residents, visitors, and businesses, particularly those relying
heavily on transportation. SANDAG staff will work with Board Members,
stakeholders, and community members to develop implementation
strategies for a road usage charge, including high level constructs of the
program, such as who will pay, the fee structure, and the distribution of
revenues. SANDAG is committed to developing a carefully constructed
program that will ensure that no particular group, such as those driving
fuel-powered vehicles, are paying more than their fair share.

RESPONSE TO COMMENT 42-2

This comment is not related to the adequacy of the Draft EIR, or the
contents of the proposed Plan, and no further response is given.
RESPONSE TO COMMENT 43-1
As an initial matter, this comment relates to the proposed Plan and does not address the adequacy of the Draft EIR. The potential use of low carbon concrete is discussed in Section 4.8 of the Draft EIR and is incorporated into mitigation measure GHG-5e: “Implement sustainable construction measures through construction bid specifications, including... use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements” (page 4.8-50).

COMMENT LETTER 43: BRENT TANNER

Commenter: Brent Tanner
Agency: Aggregate Technologies
Contact Information: bтанner@gmail.com
Date Received: 3/30/2021

As an initial matter, this comment relates to the proposed Plan and does not address the adequacy of the Draft EIR. The potential use of low carbon concrete is discussed in Section 4.8 of the Draft EIR and is incorporated into mitigation measure GHG-5e: “Implement sustainable construction measures through construction bid specifications, including... use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements” (page 4.8-50).
San Diego needs more efficient concrete. With the availability of green concrete that uses 35% less Portland cement, therefore producing concrete with 35% lower carbon footprint and reduced environmental impact, it becomes clear that your imperative is to explore securing a procurement that meets this new, attainable goal. Such a procurement would align well with SANDAG’s Sustainable Communities Strategy (SCS).

This innovation is the direction the concrete industry is headed...wouldn’t San Diego rather be leading than following? Please contact me immediately to discuss how using green concrete can begin making a significant difference for San Diego and for the whole country.

Best Regards,

Brant R. Tanner
COMMENT LETTER 44: CRAIG FORMAN

RESPONSE TO COMMENT 44-1

As an initial matter, this comment relates to the proposed Plan, and not the Draft EIR.

The funding strategy for the proposed Plan includes over 30 different funding sources, including local sales tax revenue and property taxes from an Enhanced Infrastructure Financing District (EIFD) surrounding the Central Mobility Hub project. An EIFD works by diverting future increases in property tax revenues that will result from the project due to the increasing property values.
Response to Comment 45-1

Thank you for your comments and consideration of the proposed Plan. This comment does not appear to be a comment about the content or analysis of the Draft EIR or the proposed Plan, and as such no response is required.
COMMENT LETTER 46: JAMES FERGUSON

I have reviewed the executive summary and concur with its priorities. We must reduce vehicle miles traveled, and attendant emissions. Public transportation infrastructure and housing development patterns that eliminate sprawl, enhance compact business/residential access, and reduce GHG emissions are essential for our future, sooner rather than later. It is very difficult to ‘retrofit’ after a long history of laissez-faire development policy. But, we must begin.

RESPONSE TO COMMENT 46-1

Thank you for your comments and consideration of the proposed Plan. Thank you for your support.
COMMENT LETTER 47: CRAIG NELSON

RESPONSE TO COMMENT 47-1

Thank you for your comments and consideration of the proposed Plan. As shown in Section 4.16, Transportation, of the EIR, there is currently an average of 257,891 daily transit trips (page 4.16-32). The number of trips is projected to increase to 416,061 in 2025, to 805,642 in 2035, and to 944,876 in 2050. Transit Mode Share would increase from 1.7 percent in 2016 to 5.6 percent in 2050 (Draft EIR page 4.16-41).
As an initial matter, this comment relates to the proposed Plan, and not the Draft EIR.

The proposed Plan incorporates a variety of value pricing and user strategies as tools to improve mobility by encouraging changes in travel behaviors while generating revenue to address the region’s aging infrastructure and expand travel options. Specifically, the proposed Plan explores a network of Managed Lanes, a mileage-based road usage charge, a fee on the fares charged for rides provided by Transportation Network Companies, and further subsidization of transit fares. Strategies such as these are in different phases of planning, design, pilot, and deployment in different areas of the region and are also being explored at the State and federal level. SANDAG will rely on coordination with the other MPOs in California along with Caltrans to integrate the selection of technology, collection methods, and account management to ensure a consistent experience for travelers. Meanwhile, the design of these strategies, such as the fee structure and distribution of revenue, should be specifically developed for the San Diego region’s unique environment and priorities.

SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed
program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.
COMMENT LETTER 49: JUSTIN WONG

COMMENTER: Justin Wong
Agency: Not Provided
Contact Information: justin34@gmail.com
Date Received: 3/7/2021

Comment:
I would like to receive info about expanding NCTD Transit options to Miracosta

RESPONSE TO COMMENT 49-1

Thank you for your comments and consideration of the proposed Plan. The proposed Plan includes Rapid 477, which would run from Carlsbad Village to SR 76 via College Boulevard and would serve Mira Costa College. In addition, the Plan proposes Flexible Fleets as a variety of on-demand services that could offer mobility options for Mira Costa College.
COMMENT LETTER 50: JUSTIN WONG

RESPONSE TO COMMENT 50-1
See response to the duplicate comment above (49-1).
COMMENT LETTER 51: ELIZABETH FATTAH

RESPONSE TO COMMENT 51-1

As an initial matter, this comment relates to the proposed Plan, and not the Draft EIR. It will be considered by the SANDAG Board of Directors when it considers approval of the proposed Plan.

Also note that, as included under mitigation measure GHG-5c in Section 4.8, SANDAG shall implement, or provide funding to implement, projects that restore or enhance native habitats to increase rates of carbon sequestration over baseline conditions.

Route 52 should not be expanded to more lanes. Use the money for public transit and making it easier and cheaper for people to use Public Transportation. We are in a climate crisis which means that we need to sequester carbon, not to add more to the planet.
A Resolution of the San Diego Association of Governments Board of Directors Adopting the Air Quality Conformity Determination, Finding that the Sustainable Communities Strategy (SCS) Achieves the Regional Greenhouse Gas Reduction Targets established by the California Air Resources Board; and Adopting San Diego Forward: the 2021 Regional Plan, including its SCS, its Supporting Analyses, and the Series 14 Regional Growth Forecast

WHEREAS, the San Diego Association of Governments (SANDAG) is the federally designated Metropolitan Planning Organization (MPO), pursuant to Title 23 United States Code Sections 134(a) and (g), and the state designated Regional Transportation Planning Agency, for the San Diego County region pursuant to California Public Utilities Code Section 132005; and

WHEREAS, Title 23, Part 450 and Title 49, Part 613 of the Code of Federal Regulations (CFR), require SANDAG, as the MPO, to prepare and update a long-range Regional Transportation Plan (RTP) every four years; and

WHEREAS, Section 65080 of the California Government Code requires SANDAG as the regional transportation planning agency for the San Diego region to prepare and update a long-range RTP and Sustainable Communities Strategy (SCS) every four years; and

WHEREAS, on October 8, 2019, Governor Gavin Newsom signed into law California Assembly Bill 1730 (Gonzalez) (AB 1730), which amended California Government Code Section 65080(d) to provide that the regional transportation plan, sustainable communities strategy, and Environmental Impact Report adopted by SANDAG on October 9, 2015, shall remain in effect for all purposes, including for purposes of consistency determinations and funding eligibility until SANDAG adopts its next update to its Regional Transportation Plan on or before December 31, 2021; and

WHEREAS, to ensure compliance with federal laws applicable to regional transportation plans and air quality conformity, on October 25, 2019, the SANDAG Board of Directors found the Revenue Constrained San Diego Forward: The 2019 Federal Regional Transportation Plan in conformance with all applicable State Implementation Plan (SIP) requirements for air quality, in accordance with the transportation conformity requirements contained in 40 CFR Part 51 and Part 93, as required by Section 176(c) of the federal Clean Air Act (42 U.S.C. Sec. 7506) as amended, and the 2016 Regional Air Quality Strategy (RAQS) in accordance with California law; and

WHEREAS, Section 132360 of the California Public Utilities Code states that SANDAG should update its Regional Comprehensive Plan (RCP) so that it is compatible with its RTP; the RCP was integrated into the Regional Plan in 2015 resulting in one comprehensive planning document for the region; and

WHEREAS, through the conduct of a continuing, comprehensive, and coordinated transportation planning process in conformance with all applicable federal and state requirements, SANDAG developed its latest RTP, San Diego Forward: The 2021 Regional Plan (Regional Plan), with a 2050 horizon
year, which incorporates an SCS for the San Diego region consistent with Government Code Section 65080 requirements; and

WHEREAS, the Regional Plan considers how the region will grow, where people will live, and how people and goods will move around the region. It provides a framework for a fast, fair, and clean transportation system and a resilient region through the efficient movement of people and goods, access to affordable, reliable, and safe mobility options, and healthier air and reduced greenhouse gas emissions; and

WHEREAS, the Regional Plan includes the mandatory policy, action, and financial elements as identified in the Code of Federal Regulations Title 23 Part 450 and Title 49, Part 613, and the SCS and other state RTP requirements as identified in California Government Code Section 65080; and

WHEREAS, on April 9, 2021, the SANDAG Board of Directors adopted Resolution No. 2021-17 directing staff to consider the following when drafting the Regional Plan: (1) the health results caused by implementing the Regional Plan, with an emphasis on disadvantaged communities that have historically borne a disproportionate share of pollution; (2) alternatives to driving for the most disadvantaged communities; (3) consistency with local climate action plans; (4) at least a 30% per capita greenhouse gas emissions reduction from the entire on-road transportation sector by 2035; (5) a transit rate structure that increases ridership and expands access to mobility; (6) infrastructure that helps ensure that public transit is safe, comfortable, convenient and competitive with automobile travel; (7) local workforce and careers in construction for our region through project labor agreements; and (8) biodiversity, natural habitats, open space and other natural and cultural resources through effective land use planning that supports regional habitat conservation programs such as the Multiple Species Conservation Program, Multiple Habitat Conservation Program, and their supporting land use plans and zoning; Attachment 4 to the Board of Directors December 10, 2021, agenda documents on how Regional Plan preparation considered these factors; and

WHEREAS, the Regional Plan considers, analyzes, and reflects, as appropriate, the metropolitan transportation planning process as identified in the federal Fixing America’s Surface Transportation Act (P.L. 114-94) as well as the National Highway System Designation Act of 1995, and is based on reasonably available funding provisions; and

WHEREAS, the Regional Plan serves as a Congestion Management Process consistent with 23 CFR Part 450.322, which includes regional objectives, a multimodal transportation network, performance measures, data collection, analysis of congestion, strategy identification, strategy implementation, and evaluation; and

WHEREAS, SANDAG has conducted an air quality conformity analysis for the Regional Plan (Regional Plan Appendix C), using the most recent planning assumptions, emissions model, and consultation provisions that complies with the San Diego Transportation Conformity Procedures adopted in July 1998, which in turn complies with federal requirements under 40 CFR Part 93 and includes a quantitative regional emissions analysis that meets emissions budget requirements of the U.S. Environmental Protection Agency transportation conformity rule (40 CFR Part 93); and

WHEREAS, transportation control measures (TCMs) from the 2016 RAQS and 1982 SIP for air quality have been given emphasis in the Regional Plan, which provides for the expeditious implementation of all applicable TCMs; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(E) and federal public participation requirements (23 CFR Part 450.316), the Regional Plan, including its SCS, was developed through a strategic, proactive, comprehensive public outreach and involvement program, which included implementing an adopted public participation plan; a virtual meeting on February 12, 2021, with representatives from the County Board of Supervisors and from all city councils, noticed to the clerks of the Board of Supervisors and cities, pursuant to Government Code Section 65080(b)(2)(E); six virtual public
engagement gatherings in June 2021 to facilitate public comment on the Draft Regional Plan, pursuant to Government Code Section 65080(b)(2)(F)(iii); and two noticed virtual public hearings to receive testimony on the Draft Regional Plan and its SCS, pursuant to Government Code Section 65080(b)(2)(F)(v), and a Board of Directors meeting on October 8, 2021, to provide an overview of the Environmental Impact Report; and interagency coordination and involvement; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B), the Regional Plan SCS used the most recent planning assumptions considering local general plans and other factors, including the Series 14 Regional Growth Forecast was developed working with local jurisdictions and which is based on the California Department of Finance population projections released in January 2020; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B), the Regional Plan SCS also: (i) identifies the general location of uses, residential densities, and building intensities within the region; (ii) identifies areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (iii) identifies areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (iv) identifies a transportation network to service the transportation needs of the region; (v) gathers and considers the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Government Code Section 65080.01; (vi) considers the state housing goals specified in Government Code Sections 65580 and 65581; and (viii) allows the RTP to comply with Section 176c of the federal Clean Air Act (42 U.S.C. Sec. 7506); and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B)(vii), the Regional Plan SCS also sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, if implemented, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve the regional greenhouse gas emission targets set by the California Air Resources Board (CARB); and

WHEREAS, CARB set the per capita greenhouse gas emission reduction targets for automobiles and light trucks for the San Diego region at 15 percent by 2020 and 19 percent by 2035 from a 2005 base year.

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B), the Regional Plan SCS considered spheres of influence adopted by the San Diego Local Agency Formation Commission; and

WHEREAS, the Regional Plan includes the elements of the RCP pursuant to Section 132360 et seq. of the California Public Utilities Code, and SANDAG followed the public participation and consultation process described therein.

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

BE IT FURTHER RESOLVED THAT the SANDAG Board of Directors finds the Revenue Constrained Regional Plan is in conformance with all applicable SIP requirements for air quality, and the emissions budgets included in the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (October 2020), in accordance with the transportation conformity requirements contained in 40 CFR Part 51 and Part 93, as required by Section 176(c) of the federal Clean Air Act (42 U.S.C. Sec. 7506) as amended, and the 2015 revisions to the National Ambient Air Quality Standards for ground-level ozone pursuant to Sections 108 and 109 of the Clean Air Act (42 U.S.C. Sec 7408 and Sec. 7409) as amended, as well as the 2016 RAQS, in accordance with California law; and

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BE IT FURTHER RESOLVED that the SANDAG Board of Directors finds that the Regional Plan, including its SCS, if implemented, achieves the regional greenhouse gas reduction targets established by the CARB and meets all other applicable requirements of Senate Bill 375 (Steinberg, 2008) as codified in Government Code §65080(b) et seq.; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors finds that the following were considered when drafting the Regional Plan: (1) the health results caused by implementing the Regional Plan, with an emphasis on disadvantaged communities that have historically borne a disproportionate share of pollution; (2) alternatives to driving for the most disadvantaged communities; (3) consistency with local climate action plans; (4) at least a 30% per capita greenhouse gas emissions reduction from the entire on-road transportation sector by 2035; (5) a transit rate structure that increases ridership and expands access to mobility; (6) infrastructure that helps ensure that public transit is safe, comfortable, convenient and competitive with automobile travel; (7) local workforce and careers in construction for our region through project labor agreements; and (8) biodiversity, natural habitats, open space and other natural and cultural resources through effective land use planning that supports regional habitat conservation programs such as the Multiple Species Conservation Program, Multiple Habitat Conservation Program and their supporting land use plans and zoning; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors does hereby adopt San Diego Forward: The 2021 Regional Plan, including its SCS, its supporting analyses, and the Series 14 Regional Growth Forecast.

PASSED AND ADOPTED this 10th of December, 2021.

Attest:

Chair

Secretary

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

Advisory Members: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, Port of San Diego, San Diego County Water Authority, Southern California Tribal Chairmen’s Association, and Mexico.
Discussion of Topics in SANDAG Board of Directors Resolution No. 2021-17

On April 9, 2021, the SANDAG Board directed staff to consider specific topics in developing the 2021 Regional Plan by adopting Resolution No. 2021-17. The following documents how each topic has been considered.

The health results caused by implementing the 2021 Regional Plan, with an emphasis on disadvantaged communities that have historically borne a disproportionate share of pollution

A critical component of reviewing the impacts of the 2021 Regional Plan is evaluating the effects on historically underserved and systemically marginalized groups. This evaluation is known as a social equity analysis and focuses on communities of color, residents with low incomes, and seniors. While the 2021 Regional Plan delivers improvements to the entire region, this review ensures that the benefits are shared by everyone and that the burdens of the 2021 Regional Plan’s changes are not disproportionately shouldered by any social equity focus population. Appendix H includes results of the Social Equity Analysis for the 2021 Regional Plan and Attachment 2 to Appendix A describes how strategies in the 2021 Regional Plan reduce pollution exposure in disadvantaged communities. In addition, the Community Health Equity Evaluation concludes that disadvantaged communities would equally benefit from the implementation of the 2021 Regional Plan as would the San Diego County region and have slightly greater reductions in total avoided mortalities compared to the region.

Alternatives to driving for the most disadvantaged communities

Appendix H analyzes access to transit and bicycle facilities for low-income, minority, and senior populations. For each of these populations, the percentage of people living within .5 miles of commuter rail, light rail, or Rapid transit increases by at least 20% by 2035, and the percentage of people living within .25 miles of a bicycle facility increases by at least 10% by 2035. In addition, Appendix A, Attachment 2 describes strategies to reduce pollution exposure in disadvantaged communities (as designated by CalEnviroScreen 3.0). Many of these strategies to reduce pollution exposure also provide alternatives to driving for disadvantaged communities.

Consistency with local Climate Action Plans

SANDAG will support local jurisdictions with implementing and monitoring Climate Action Plans (CAPs) by providing grant funding, guidance resources, and templates for CAP implementation (see Climate Action Planning Program in Appendix B). Resources include the Regional Climate Action Planning Framework (ReCAP) and the Climate Action Data Portal, which houses greenhouse gas inventory and CAP monitoring data to help jurisdictions monitor progress toward CAP goals. These resources help jurisdictions use consistent approaches, methodologies, and data, while also preserving their flexibility to form their own local policies.

At least a 30% per capita greenhouse gas emissions reduction from the entire on-road transportation sector by 2035

Section 4.8.3 of the Environmental Impact Report evaluates whether the 2021 Regional Plan would achieve at least a 30% reduction in per capita emissions from the entire on-road transportation sector by 2035. It concludes that implementation of the 2021 Regional Plan would reduce 2035 per-capita greenhouse gas emissions from the on-road transportation sector by 39% compared to 2016 levels, which is higher than the 30% reduction identified in SANDAG Board Resolution No. 2021-17.

A transit rate structure that increases ridership and expands access to mobility

The 2021 Regional Plan assumes a 50% transit fare subsidy for people with low-income by 2027 and a 50% subsidy for all by 2035. Implementation of the 2021 Regional Plan, including this rate structure, is expected to increase daily transit boardings from 380,540 in 2016, to 1,235,770 in 2035, and 1,440,963 in 2050.
(see Appendix T, Attachment 6). In addition, Appendix B includes an implementation action to evaluate the transition to free public transit by 2030, which could further increase transit ridership.

**Infrastructure that helps ensure that public transit is safe, comfortable, convenient, and competitive with automobile travel**

SANDAG, the Metropolitan Transit System (MTS), and the North County Transit District believe that more can be done to improve the safety on and near transit and are working to make those improvements now and in the future. For example, MTS has reprioritized security funding from fare enforcement to safety improvements. Performance measures for the 2021 Regional Plan demonstrate convenient public transit by increasing transit access (measured by time) to different types of destinations, including basic needs (retail, parks, and medical facilities) and opportunities (employment centers and higher education). For all measures, the percent of population that can access these destinations via transit improves with implementation of the 2021 Regional Plan. Performance measures for the 2021 Regional Plan demonstrate that public transit is competitive with automobile travel in terms of corridor travel times for several major corridors. Appendix T, Attachment 6 contains detailed performance measure results.

**Local workforce and careers in construction for our region through Project Labor Agreements**

On July 23, 2021, the Board of Directors authorized staff to begin negotiations with the San Diego County Building and Construction Trades Council to execute a Community Benefits Agreement. Staff will return to the Board with updates as negotiations progress.

**Biodiversity, natural habitats, open space, and other natural and cultural resources through effective land use planning that supports regional habitat conservation programs such as the Multiple Species Conservation Program, Multiple Habitat Conservation Program, and their supporting land use plans and zoning**

SANDAG will continue and expand its existing grant programs, partner with member agencies on state funding opportunities, and provide data and technical support to assist local jurisdictions with land use planning efforts in line with the 2021 Regional Plan. To meet the region’s habitat conservation goals, the 2021 Regional Plan identifies approximately $3 billion for habitat-related efforts. This includes $2,087 million for an enhanced habitat conservation, management, and monitoring program (see Land Use and Habitat programs in Appendix B), a $565 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (see Climate Adaptation and Resilience programs in Appendix B), and $300 million to $500 million of land acquisition and restoration for habitat mitigation of transportation projects (incorporated in project costs presented in Appendix A).
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Appendix C: Air Quality Planning and Transportation Conformity

Executive Summary
The San Diego Association of Governments (SANDAG), as the region’s Metropolitan Planning Organization (MPO), must make a transportation air quality conformity determination for regional transportation plans (RTPs) and regional transportation improvement programs (RTIPs). The purpose of transportation conformity is to ensure that federally funded or approved activities are consistent with the State Implementation Plan (SIP). This ensures that no transportation activities will cause or contribute to new air quality violations, worsen existing violations, or delay the attainment of any relevant National Ambient Air Quality Standards (NAAQS). This appendix documents a demonstration of conformity for the 2008 and 2015 ozone NAAQS for San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) and air quality analysis for the 2021 Regional Transportation Improvement Program (2021 RTIP) Amendment No. 06. The 2021 Regional Plan serves as the region’s RTP.

Background
The federal Clean Air Act (CAA), which was last amended in 1990, requires the U.S. Environmental Protection Agency (U.S. EPA) to set NAAQS for pollutants considered harmful to public health and the environment. California has adopted state air quality standards that are more stringent than the NAAQS. Areas with levels that violate the standard for specified pollutants are designated as Nonattainment Areas.

The U.S. EPA requires that each state containing Nonattainment Areas develop and adopt plans to attain the NAAQS by a specified attainment deadline. These attainment plans are called SIPs. The San Diego County Air Pollution Control District (SDAPCD), in collaboration with the California Air Resources Board (CARB), prepares the San Diego portion of the California SIP. Once the standards are attained, further plans—called Maintenance Plans—are required to demonstrate continued maintenance of the NAAQS.

SANDAG and the U.S. Department of Transportation (U.S. DOT) must make a determination that the RTP and the RTIP conform to the SIP for air quality. Conformity to the SIP means that transportation activities will not create new air quality violations, worsen existing violations, or delay the attainment of the NAAQS. Conformity determinations are guided by U.S. EPA’s Transportation Conformity rule (40 CFR 93.100 et seq.).

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1 While most California air quality standards are more stringent than those developed by U.S. EPA, the 2015 Eight-Hour Ozone Standards are the same.
This document demonstrates regional transportation conformity to the 2020 San Diego Ozone SIP (2020 SIP) for both the 2008 and 2015 ozone NAAQS. The year of the SIP corresponds to the year SDAPCD developed the document.

On November 19, 2020, CARB adopted the proposed San Diego Eight-Hour Ozone Attainment Plan SIP submittal, which addresses both the 2008 and 2015 ozone standards. Included in the San Diego 2020 SIP is a request for a voluntary reclassification from Serious to Severe nonattainment for the 2008 ozone standard and a voluntary reclassification from Moderate to Severe nonattainment for the 2015 ozone standards as permitted under Section 181(b)(3). The reclassification extends the timeline to meet the standards and aligns with air quality modeling. Effective July 2, 2021, U.S. EPA approved the request from the State of California to reclassify San Diego County ozone Nonattainment Area from Serious to Severe for the 2008 ozone standard and Moderate to Severe for the 2015 ozone standard.


On July 12, 2021, the San Diego 2020 SIP was found complete by U.S. EPA by operation of law six months after the submittal date. Under the CAA, U.S. EPA has twelve months from the completeness date to take a final action on the 2020 SIP.

2008 Ozone Standard

Effective June 3, 2016, the U.S. EPA determined that 11 areas, including the San Diego air basin, failed to attain the 2008 ozone NAAQS by the applicable attainment date of July 20, 2015, and thus were reclassified by operation of law as Moderate for the 2008 ozone NAAQS (81 FR 26697). States containing these new Moderate areas were required to submit SIP revisions that met the statutory and regulatory requirements that apply to 2008 ozone Nonattainment Areas classified as Moderate by January 1, 2017. The 2016 SIP addressed the required SIP revisions.

Effective July 2, 2021, U.S. EPA approved the request from the State of California to reclassify San Diego County ozone Nonattainment Area from Serious to Severe for the 2008 Eight-Hour Ozone Standard. The reclassification of the 2008 Eight-Hour Ozone Standard from Serious to Severe changed the attainment date from July 20, 2021, (as a Serious area) to July 20, 2027, (as a Severe area) and the attainment demonstration year from 2020 to 2026.

2015 Ozone Standard
On October 26, 2015, the U.S. EPA announced a revised ozone standard, referred to as the 2015 ozone standard (80 FR 65292). The new standard revised the allowable ozone level to 0.070 parts per million (ppm). The 2015 ozone standard became effective on December 28, 2015. On June 4, 2018, U.S. EPA published a final rule that designated the San Diego air basin as nonattainment, with a classification of Moderate, for the 2015 ozone NAAQS with an attainment deadline of August 3, 2024, and an attainment year of 2023 (83 FR 25776, effective August 3, 2018).

On May 24, 2019, the SANDAG Board of Directors (Board) adopted the 2015 Ozone National Ambient Air Quality Standard Conformity Demonstration for San Diego Forward: The 2015 Regional Plan (2015 Regional Plan) and the 2018 RTIP. The conformity demonstration found the 2015 Regional Plan and 2018 RTIP, as amended, in conformity with the requirements of the federal CAA and applicable SIP. The U.S. DOT, in consultation with U.S. EPA, made its conformity determination on June 21, 2019, indicating that all air quality conformity requirements have been met, including those for the 2015 ozone standard.

Effective July 2, 2021, U.S. EPA approved the request from the State of California to reclassify San Diego County ozone Nonattainment Area from Moderate to Severe for the 2015 Eight-Hour Ozone Standard. The reclassification of the 2015 Eight-Hour Ozone Standard from Moderate to Severe changed the attainment date from August 3, 2024, (as a Moderate area) to August 3, 2033, (as a Severe area) and the attainment demonstration year from 2023 to 2032.

Carbon Monoxide Standard
The San Diego region had been designated by the U.S. EPA as a federal maintenance area for the Carbon Monoxide (CO) standard. On November 8, 2004, CARB submitted the 2004 revision to the California SIP for CO to the U.S. EPA, which extended the maintenance plan demonstration to 2018. Effective January 30, 2006, the U.S. EPA approved this maintenance plan as an SIP revision. On March 21, 2018, the U.S. EPA documented in a letter that transportation conformity requirements for CO would cease to apply after June 1, 2018. Therefore, this appendix does not include a CO conformity analysis.

Conformity Determinations for the 2019 Federal Regional Transportation Plan, 2018 RTIP, and 2021 RTIP
On October 25, 2019, the Board adopted San Diego Forward: The 2019 Federal Regional Transportation Plan (2019 Federal RTP) and 2018 RTIP Amendment No. 08 and found the 2019 Federal RTP and 2018 RTIP, as amended, in conformity with the requirements of the
federal CAA and applicable SIP. The U.S. DOT, in consultation with U.S. EPA, made its conformity determination on November 15, 2019.

On February 26, 2021, the Board adopted the 2021 RTIP, found the 2021 RTIP in conformity with the requirements of the federal CAA and applicable SIP, and redetermined air quality conformity of the revenue-constrained 2019 Federal RTP. On April 16, 2021, the Federal Highway Administration provided conformity determination on the full Federal Statewide Transportation Improvement Program.

**Transportation Conformity: Modeling Procedures**

**Introduction**

Conformity determination of the 2021 Regional Plan and conformity analysis of the 2021 RTIP Amendment No. 06 have been conducted simultaneously for consistency purposes. Table C.9 includes the conformity analysis for both the 2021 Regional Plan and 2021 RTIP Amendment No. 06. The 2021 Regional Plan provides information on revenue assumptions in Chapter 3 and Appendix V: Funding and Revenues. In addition, this conformity determination fulfills the requirement of California Senate Bill 375 (Steinberg, 2008), which requires a Sustainable Communities Strategy (SCS) to allow for compliance with Section 176 of the federal CAA. (California Government Code Section 65080[b][2][B][viii].)

The following sections provide an overview of models, modeling inputs, and processes used in transportation conformity. For additional details on population, employment, and land use, refer to Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern. Appendix S: Travel Demand Modeling Tools provides additional modeling documentation and Appendix T, Attachment 5: Strategies Applied in ABM2+ provides details on strategy applications within modeling structure.

**Growth Forecasts**

Every three to five years, SANDAG produces a long-range forecast of population, housing, and employment growth for the San Diego region. The forecast process relies upon an integrated forecasting model. The first element is the San Diego Demographic and Economic model, which provides a detailed socioeconomic forecast for the region. Next, the regionwide data are allocated to the parcel level based upon the forecasted development pattern for the 2021 Regional Plan (SCS land use pattern), which must use the most recent planning assumptions considering local general plans and other factors. This includes current plans and policies of the jurisdictions and increasing density near transit and job centers, consistent with regional goals for sustainability, mobility, housing affordability, and economic prosperity. The parcel-level forecast data can be aggregated up to larger subregional areas of interest.
On January 6, 2021, SANDAG consulted with the San Diego Region Conformity Working Group (CWG) on the use of the Series 14 Regional Growth Forecast, SCS land use pattern, for the air quality conformity analysis of the 2021 Regional Plan. Previously, both the U.S. DOT and the U.S. EPA concurred that approved plans should be used as input in the air quality conformity process. Figure C.1 and Table C.1 show the regional population, jobs, and housing growth forecast for the San Diego region through 2050.

Figure C.1: San Diego Regional Population, Jobs, and Housing Forecast

![Chart showing population, jobs, and housing forecast from 2016 to 2050.]

Source: Series 14 Regional Growth Forecast, SCS land use pattern, SANDAG

Table C.1: San Diego Regional Population and Employment Forecast

<table>
<thead>
<tr>
<th>Year</th>
<th>Population</th>
<th>Employment</th>
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<tbody>
<tr>
<td>2016</td>
<td>3,309,510</td>
<td>1,646,419</td>
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<td>2025</td>
<td>3,470,848</td>
<td>1,761,747</td>
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<tr>
<td>2035</td>
<td>3,620,348</td>
<td>1,921,475</td>
</tr>
<tr>
<td>2050</td>
<td>3,746,073</td>
<td>2,086,318</td>
</tr>
</tbody>
</table>

Source: Series 14 Regional Growth Forecast, SCS land use pattern, SANDAG
The Series 14 Regional Growth Forecast, SCS land use pattern, uses planning assumptions from the adopted general plans and community plans and policies of the 18 cities and the county. Because many of the local general plans have horizon years of 2030—20 years before the Series 14 Regional Growth Forecast horizon year—the later part of the forecast was developed in collaboration with each of the local jurisdictions through an iterative process that allowed each city to provide their projections for land uses in those later years. The Series 14 Regional Growth Forecast, SCS land use pattern, thus represents in compliance with 40 CFR 93.110(a), the “latest planning assumptions” in force at the time this conformity analysis began.

**Travel Modeling**

The following sections provide an overview of the SANDAG travel model and the travel model flow, spatial and temporal resolution, residents travel model, special market models, trip assignment, model inputs, data sources, and emissions modeling.

SANDAG uses an updated second-generation activity-based model (ABM2+) that incorporates the latest planning assumptions at the time the conformity analysis began per 40 CFR 93.110 to support the development of the RTP and its conformity demonstration. An ABM simulates individual and household transportation decisions that comprise their daily travel itinerary. It predicts whether, where, when, and how people travel outside their home for activities such as work, school, shopping, healthcare, and recreation.

The SANDAG ABM2+ includes a number of methodological strengths. It predicts the travel decisions of San Diego residents at a detailed level, taking into account the way people schedule their day, their behavioral patterns, and the need to cooperate with other household members. When simulating a person’s travel patterns, the ABM takes into consideration a multitude of personal and household attributes like age, income, gender, and employment status. The model’s fine temporal and spatial resolution ensures that it is able to capture subtle aspects of travel behavior.

To support the 2021 Regional Plan, SANDAG enhanced the ABM2+ functionality for application to the 5 Big Moves planning efforts. These enhancements included functions to address new trends in teleworking, use of micromobility modes and transportation network companies (TNC), and new mobility options for Flexible Fleets and microtransit within Mobility Hubs.

The ABM2+ outputs are used as inputs for regional emissions forecasts. The estimates of regional transportation-related emissions analyses conducted for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 conformity analysis meet the requirements established in the Transportation Conformity Regulation (40 CFR §93.122[b] and §93.122[c]). These requirements relate to the procedures to determine regional transportation-related

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2 The Series 14 Regional Growth Forecast assumptions were presented to the Board May 25, 2018 (sandag.org/uploads/meetingid/meetingid_4785_23865.pdf). On July 10, 2020, the Board also adopted the 6th Cycle Regional Housing Needs Assessment Plan, which allocated the regional housing need at the subregional level (sandag.org/uploads/meetingid/meetingid_5410_27706.pdf).
emissions, including the use of network-based travel models, methods to estimate traffic speeds and delays, and the estimation of vehicle miles traveled (VMT).

The ABM2+ accounts for a variety of different weekday travel markets in the region, including San Diego region resident travel, travel by Mexico residents and other travelers crossing San Diego County's borders, visitor travel, airport passengers at both the San Diego International Airport and the Cross Border Xpress (CBX) bridge to the Tijuana International Airport, and commercial travel. Many of the models used to represent demand are simulation-based models, such as activity-based or tour-based approaches, while others use an aggregate three- or four-step representations of travel. Table C.2 lists the SANDAG travel markets along several key dimensions.

There are two broad types of models and three specific types of models identified in Table C.2. Disaggregate models refer to models whose demand is generated via a stochastic simulation paradigm. Both activity-based and tour-based models are simulation-based. They rely upon a synthetic population to generate travel and stochastic processes to choose alternatives. The models output disaggregate demand in the form of tour and trip lists.

The resident travel model is an activity-based model, in which all tours and activities are scheduled into available time windows across the entire day. The approach recognizes that a person can be in only one place at one time, and their entire day is accounted for in the model. A tour-based treatment is used for other special travel markets, such as Mexico resident crossborder travel, visitor travel, airport passenger travel, and commercial vehicle travel. Tour-based models do not attempt to model all travel throughout the day for each person; rather, once tours are generated, they are modeled independently of each other. A tour-based model does not attempt to schedule all travel into available time windows.

Aggregate models rely upon probability accumulation processes to produce travel demand and output trip tables. The external heavy-duty truck model and certain external travel models are aggregate.
<table>
<thead>
<tr>
<th>Travel Market</th>
<th>Description</th>
<th>Model Type</th>
<th>Temporal Resolution</th>
<th>Spatial Resolution</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Diego resident travel (internal)</td>
<td>Average weekday travel made by San Diego residents within San Diego County</td>
<td>Disaggregate</td>
<td>30-minute</td>
<td>MGRA ³</td>
</tr>
<tr>
<td>San Diego resident travel (internal–external)</td>
<td>Average weekday travel by San Diego residents between San Diego County and another county (Mexico)</td>
<td>Disaggregate</td>
<td>30-minute</td>
<td>Internal MCRA – external cordon TAZ ⁴</td>
</tr>
<tr>
<td>Mexico resident crossborder travel (external–internal and internal–internal)</td>
<td>Average weekday travel by Mexico residents into, out of, and within San Diego County</td>
<td>Disaggregate</td>
<td>30-minute</td>
<td>Internal MCRA – external cordon TAZ</td>
</tr>
<tr>
<td>Overnight visitor</td>
<td>Average weekday travel made by overnight visitors in San Diego County</td>
<td>Disaggregate</td>
<td>30-minute</td>
<td>MGRA</td>
</tr>
<tr>
<td>Airport passenger (San Diego Airport and CBX)</td>
<td>Average weekday travel made by air passengers and related trips such as taxis to/from airport</td>
<td>Disaggregate</td>
<td>30-minute</td>
<td>MGRA</td>
</tr>
<tr>
<td>External–external</td>
<td>Average weekday travel with neither origin nor destination in San Diego County</td>
<td>Aggregate</td>
<td>5 time periods</td>
<td>External cordon TAZ</td>
</tr>
<tr>
<td>Other U.S.–internal travel</td>
<td>Average weekday external–internal trips made by non-San Diego and non-Mexico residents</td>
<td>Aggregate</td>
<td>5 time periods</td>
<td>External cordon TAZ – internal TAZ</td>
</tr>
<tr>
<td>Commercial vehicle model</td>
<td>Average weekday vehicle trips made for commercial purposes (in addition to heavy trucks, includes light truck goods movements and service vehicles)</td>
<td>Disaggregate</td>
<td>5 time periods</td>
<td>TAZ</td>
</tr>
<tr>
<td>External heavy-duty truck model</td>
<td>Average weekday vehicle trips for 3 weight classes for external truck travel</td>
<td>Aggregate</td>
<td>5 time periods</td>
<td>External cordon TAZ – external cordon TAZ; external cordon TAZ – internal TAZ</td>
</tr>
</tbody>
</table>

³ MGRA = Master Geographic Reference Area; 23,002 MGRAs in the region.
⁴ TAZ = Traffic Analysis Zone; 4,996 TAZs in the region.
ABM2+ Model Flow

To simulate how San Diego residents, non-residents, and freight travel in the region, the SANDAG ABM2+ includes several models and steps. Figure C.2 outlines the overall flow of the SANDAG ABM2+. It starts with building an all-street-based active transportation network and creating Master Geographic Reference Area (MGRA) to MGRA and MGRA to Transit Access Point (TAP) walk, micromobility, or microtransit equivalent accessibility files; highway and transit network building and importing into Emme (traffic modeling software licensed from INRO); then traffic and transit assignment with warm start trip tables to get the congested highway and transit skims.

After the network skims and walk access files are created, the resident travel model is executed, followed by the other disaggregate models (visitor, San Diego International Airport, CBX terminal, crossborder, and commercial vehicle) and aggregate models (external heavy truck, external–external, and external–internal). The trip tables from all the models are summed up by vehicle classes, time of day (TOD), and value of time (VOT) and are used by traffic assignment. The skims after the traffic assignment are used for the subsequent iteration in a three-feedback-loop model run. The final traffic and transit assignment and data export concludes the ABM2+ modeling procedure. The outputs from the final step are used to generate input for Emission Factors (EMFAC) emissions modeling.
Figure C.2: SANDAG ABM2+ Flow Chart

- Import and Build Highway /Transit Networks
  - Build AT Network
    - Create AT Accessibility
  - Traffic Assignment/Skimming
    - Transit Assignment/Skimming

- Feedback Loops
  - Simulated Travel
    - San Diego Residents Travel
    - Internal-External Model
    - Cross Border Mexico Resident Model
    - Airport Models
    - Visitor Model
    - Commercial Vehicle Model

- Aggregated Travel
  - External Heavy Truck Model
  - External-Internal Model
  - External-External Model

- Auto + Truck Trip Tables / Transit Trip Tables
- Final Step
  - Traffic Assignment/Skimming
  - Transit Assignment/Skimming
  - Data Export
Spatial and Temporal Resolution

As indicated in Table C.2, different travel markets are operated in different model types with different spatial and temporal resolutions. The following section describes the treatment of space and time in the SANDAG ABM2+.

SANDAG ABM2+ utilizes the SANDAG MGRA zone system, which is one of the most disaggregate zonal systems used in travel demand models in the United States. The SANDAG MGRA system used in ABM2+ consists of 23,002 zones, which are roughly equivalent to Census blocks. To avoid computational burden, SANDAG relies on a 4,996 Traffic Analysis Zone (TAZ) system for roadway skims and assignment but performs transit calculations at the more detailed MGRA level. All activity locations are tracked at the MGRA level. The MGRA geography offers both the advantage of fine spatial resolution and consistency with network levels of service that make it ideal for tracking activity locations.

The disaggregated models function at a temporal resolution of one-half hour. These one-half hour increments begin with 3 a.m. and end with 3 a.m. the next day, though the hours between 1 a.m. and 5 a.m. are aggregated to reduce computational burden. Temporal integrity is ensured so that no activities are scheduled with conflicting time windows except for short activities/tours that are completed within a one-half hour increment. For example, a person may have a very short tour that begins and ends within the 8 a.m. to 8:30 a.m. period as well as a second, longer tour that begins within this time period but ends later in the day.

Time periods are typically defined by their midpoint in the scheduling software. For example, in a model system using one-half hour temporal resolution, the 9 a.m. time period would capture activities of travel between 8:45 a.m. and 9:15 a.m. If there is a desire to break time periods at “round” half-hourly intervals, either the estimation data must be processed to reflect the aggregation of activity and travel data into these discrete half-hourly bins or a more detailed temporal resolution must be used, such as half hours (which could then potentially be aggregated to “round” half hours).

A critical aspect of the model system is the relationship between the temporal resolution used for scheduling activities and the temporal resolution of the network simulation periods. Although each activity generated by the model system is identified with a start time and end time in one-half hour increments, level-of-service matrices are only created for five aggregate time periods: (1) early a.m.; (2) a.m.; (3) midday; (4) p.m.; and (5) evening. The trips occurring in each time period reference the appropriate transport network depending on their trip mode and the midpoint trip time. All aggregated models operate on the five aggregated time periods. Table C.3 lists the definition of time periods for level-of-service matrices.
Table C.3: Time Periods for Level-of-Service Skims and Assignment

<table>
<thead>
<tr>
<th>Number</th>
<th>Description</th>
<th>Begin Time</th>
<th>End Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Early</td>
<td>3 a.m.</td>
<td>5:59 a.m.</td>
</tr>
<tr>
<td>2</td>
<td>a.m. Peak</td>
<td>6 a.m.</td>
<td>8:59 a.m.</td>
</tr>
<tr>
<td>3</td>
<td>Midday</td>
<td>9 a.m.</td>
<td>3:29 p.m.</td>
</tr>
<tr>
<td>4</td>
<td>p.m. Peak</td>
<td>3:30 p.m.</td>
<td>6:59 p.m.</td>
</tr>
<tr>
<td>5</td>
<td>Evening</td>
<td>7 p.m.</td>
<td>2:59 a.m.</td>
</tr>
</tbody>
</table>

**Resident Travel Model**

The resident travel model is based on the Coordinated Travel Regional Activity-Based Modeling Platform family of activity-based models. This model system is an advanced, but operational, activity-based model that fits the needs and planning processes of SANDAG.

The resident travel model has its roots in a wide array of analytical developments. They include discrete choice forms (multinomial and nested logit), activity duration models, time-use models, models of individual microsimulation with constraints, entropy-maximization models, etc. These advanced modeling tools are combined to ensure maximum behavioral realism, replication of the observed activity-travel patterns, and model sensitivity to key projects and policies. The model is implemented in a microsimulation framework. Microsimulation methods capture aggregate behavior through the representation of the behavior of individual decision-makers. In travel demand modeling, these decision-makers are typically households and persons.

**Decision Modeling Units**

Decision-makers in the model system include both persons and households. These decision-makers are created (synthesized) for each simulation year based on tables of households and persons from Census data and forecasted TAZ-level distributions of households and persons by key socioeconomic categories. These decision-makers are used in the subsequent discrete-choice models to select a single alternative from a list of available alternatives according to a probability distribution. The probability distribution is generated from a logit model that takes into account the attributes of the decision-maker and the attributes of the various alternatives. The decision-making unit is an important element of model estimation and implementation and is explicitly identified for each model specified in the following sections.

To simulate trips and tours made by individuals and households, the SANDAG ABM2+ includes a total of eight person types (shown in Table C.4). The person types are mutually exclusive with respect to age, work status, and school status.
Table C.4: Person Types

<table>
<thead>
<tr>
<th>Number</th>
<th>Person-Type</th>
<th>Age</th>
<th>Work Status</th>
<th>School Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Full-time worker 5</td>
<td>18+</td>
<td>Full-time</td>
<td>None</td>
</tr>
<tr>
<td>2</td>
<td>Part-time worker</td>
<td>18+</td>
<td>Part-time</td>
<td>None</td>
</tr>
<tr>
<td>3</td>
<td>College student</td>
<td>18+</td>
<td>Any</td>
<td>College+</td>
</tr>
<tr>
<td>4</td>
<td>Non-working adult</td>
<td>18–64</td>
<td>Unemployed</td>
<td>None</td>
</tr>
<tr>
<td>5</td>
<td>Non-working senior</td>
<td>65+</td>
<td>Unemployed</td>
<td>None</td>
</tr>
<tr>
<td>6</td>
<td>Driving-age student</td>
<td>16–17</td>
<td>Any</td>
<td>Pre-college</td>
</tr>
<tr>
<td>7</td>
<td>Non-driving student</td>
<td>6–15</td>
<td>None</td>
<td>Pre-college</td>
</tr>
<tr>
<td>8</td>
<td>Preschooler</td>
<td>0–5</td>
<td>None</td>
<td>None</td>
</tr>
</tbody>
</table>

Further, workers are stratified by their occupation to take full advantage of information provided by the land use and demographic models. Table C.5 outlines the worker categories. These models are used to segment destination choice attractiveness for work location choice based on the occupation of the worker.

Table C.5: Occupation Types

<table>
<thead>
<tr>
<th>Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Management, Business, Science, and Arts</td>
</tr>
<tr>
<td>2</td>
<td>Services</td>
</tr>
<tr>
<td>3</td>
<td>Sales and Office</td>
</tr>
<tr>
<td>4</td>
<td>Natural Resources, Construction, and Maintenance</td>
</tr>
<tr>
<td>5</td>
<td>Production, Transportation, and Material Moving</td>
</tr>
<tr>
<td>6</td>
<td>Military</td>
</tr>
</tbody>
</table>

The SANDAG ABM2+ assigns one of the activity types to each out-of-home location that a person travels to in the simulation (shown in Table C.6). The activity types are grouped according to whether the activity is mandatory, maintenance, or discretionary. The classification scheme of activities into the three categories helps differentiate the importance of the activities. “Mandatory” includes work and school activities. “Maintenance” includes household-related activities, such as drop-off and pick-up of children, shopping, and medical appointments. “Discretionary” includes social and

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5 Full-time employment is defined in the SANDAG 2016 household survey as at least 30 hours/week. Part-time is less than 30 hours/week on a regular basis.
recreational activities. To determine which person types can be used for generating each activity type, the model assigns eligibility requirements. For example, a full-time worker will generate mandatory work activities, while a non-working adult or senior is eligible for non-mandatory activities. The classification scheme of each activity type reflects the relative importance or natural hierarchy of the activity, where work and school activities are typically the most inflexible in the person’s daily travel itinerary.

### Table C.6: Activity Types

<table>
<thead>
<tr>
<th>Type</th>
<th>Purpose</th>
<th>Description</th>
<th>Classification</th>
<th>Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Work</td>
<td>Working at regular workplace or work-related activities outside the home</td>
<td>Mandatory</td>
<td>Workers and students</td>
</tr>
<tr>
<td>2</td>
<td>University</td>
<td>College+</td>
<td>Mandatory</td>
<td>Age 18+</td>
</tr>
<tr>
<td>3</td>
<td>High School</td>
<td>Grades 9–12</td>
<td>Mandatory</td>
<td>Age 14–17</td>
</tr>
<tr>
<td>4</td>
<td>Grade School</td>
<td>Grades K–8</td>
<td>Mandatory</td>
<td>Age 5–13</td>
</tr>
<tr>
<td>5</td>
<td>Escorting</td>
<td>Pick-up/drop-off passengers</td>
<td>Maintenance</td>
<td>Age 16+</td>
</tr>
<tr>
<td>6</td>
<td>Shopping</td>
<td>(auto trips only)</td>
<td>Maintenance</td>
<td>5+ (if joint travel, all persons)</td>
</tr>
<tr>
<td>7</td>
<td>Other</td>
<td>Shopping away from home</td>
<td>Maintenance</td>
<td>5+ (if joint travel, all persons)</td>
</tr>
<tr>
<td>8</td>
<td>Social/</td>
<td>Personal business/services and medical appointments</td>
<td>Discretionary</td>
<td>5+ (if joint travel, all persons)</td>
</tr>
<tr>
<td></td>
<td>Recreational</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Eat Out</td>
<td>Recreation, visiting friends/family</td>
<td>Discretionary</td>
<td>5+ (if joint travel, all persons)</td>
</tr>
<tr>
<td>10</td>
<td>Other</td>
<td>Eating outside of home</td>
<td>Discretionary</td>
<td>5+ (if joint travel, all persons)</td>
</tr>
<tr>
<td></td>
<td>Discretionary</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The ABM2+ includes 22 modes available to residents, including auto by occupancy by VOT; walk; micromobility and bike modes; and walk and drive access to local, premium, or local and premium transit modes. All auto modes are included in traffic assignment, with Kiss & Ride to transit and TNC and taxi as shared ride modes and Park & Ride to transit as drive-alone mode. All transit modes are included in transit assignment, with TNC to transit as Kiss & Ride to transit. Table C.7 lists the trip modes defined in the resident travel model.
To model transit flow, the ABM2+ uses three transit modes of local bus only, premium transit only, and local bus plus premium modes. Each mode is by three access modes of walk, Park & Ride, Kiss & Ride (including TNC) to transit, resulting in total of nine transit trip TAP–TAP matrices. The premium modes include any non-local bus modes: Tier 1 heavy rail; commuter rail (COASTER); hybrid rail (SPRINTER); light rail transit (LRT) (including Trolley and Streetcar); Bus Rapid Transit (Rapid); and Express Bus. The local bus plus premium mode includes transfer between local bus and premium modes.

Table C.7: Trip Modes

<table>
<thead>
<tr>
<th>Number</th>
<th>Mode</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Drive-Alone Non-Transponder</td>
</tr>
<tr>
<td>2</td>
<td>Drive-Alone Transponder</td>
</tr>
<tr>
<td>3</td>
<td>Shared Ride 2 Person</td>
</tr>
<tr>
<td>4</td>
<td>Shared Ride 3+ Person (non-toll)</td>
</tr>
<tr>
<td>5</td>
<td>Walk – Local Bus Only</td>
</tr>
<tr>
<td>6</td>
<td>Walk – Premium Transit Only</td>
</tr>
<tr>
<td>7</td>
<td>Walk – Local Bus and Premium Transit</td>
</tr>
<tr>
<td>8</td>
<td>Park &amp; Ride – Local Bus Only</td>
</tr>
<tr>
<td>9</td>
<td>Park &amp; Ride – Premium Transit Only</td>
</tr>
<tr>
<td>10</td>
<td>Park &amp; Ride – Local Bus and Premium Transit</td>
</tr>
<tr>
<td>11</td>
<td>Kiss &amp; Ride – Local Bus Only</td>
</tr>
<tr>
<td>12</td>
<td>Kiss &amp; Ride – Premium Transit Only</td>
</tr>
<tr>
<td>13</td>
<td>Kiss &amp; Ride – Local Bus and Premium Transit</td>
</tr>
<tr>
<td>14</td>
<td>TNC to Transit – Local Bus Only</td>
</tr>
<tr>
<td>15</td>
<td>TNC to Transit – Premium Transit Only</td>
</tr>
<tr>
<td>16</td>
<td>TNC to Transit – Local and Premium Transit</td>
</tr>
<tr>
<td>17</td>
<td>Walk (walk, micromobility, and microtransit modes)</td>
</tr>
<tr>
<td>18</td>
<td>Bike</td>
</tr>
<tr>
<td>19</td>
<td>Taxi</td>
</tr>
<tr>
<td>20</td>
<td>TNC Single</td>
</tr>
<tr>
<td>21</td>
<td>TNC Pooled</td>
</tr>
<tr>
<td>22</td>
<td>School Bus (only available for school purpose)</td>
</tr>
</tbody>
</table>
The resident travel model comprises numerous interacting components, called “submodules.” It starts with generating a representative population for the San Diego region. Once a representative population is created, the model predicts long-term and medium-term decisions such as a choice of work or school location and a household’s choice of number of cars to own. Next, each person’s day is scheduled, taking into account the priority of various activities and interaction among the household members. Once all journeys to and from home have been scheduled, the model predicts specific travel details such as mode, the number of stops to make, where to stop, and when to depart from each stop to continue the tour. A tour is a journey that begins and ends at home, and it can include stops at other destinations on the way to or from the primary destination. The results of resident travel model are a list of trips and tours by person by household by time of day.

The following section discusses the submodules in the order that each submodule is taken within the resident travel model.

**Step 1: Population Synthesis (Build a Representative Population That Looks Like San Diego)**

The first step is to create a “synthetic” population of San Diego County. A synthetic population is a table that has a record for every individual and household with the individual’s and the household’s characteristics. For example, if there are 41,000 18-year-old males in the region in 2050, there would be approximately 41,000 records in the table for males age 18, with each record also having other characteristics, such as school enrollment and labor force participation status. Taken as a whole, this synthetic population represents the decision-makers whose travel choices the model will simulate in later steps. For each simulation year, a full population is synthesized to match the forecasted socioeconomic and housing characteristics of each part of the region at the zonal level. These forecasts, a key ABM2+ input, come from the land use model. Synthesis works by replicating a sample of Census records (each containing complete household and individual characteristics) and placing them around the region in such a way that the forecasted characteristics of each zone are matched.

**Step 2: Work and School Location (Assign a Work Location to Workers and a School Location to Students)**

The second step predicts if a worker works from home, or where each worker will go to work and where each student will go to school, if applicable. Before workplace/university/school location choice, a car ownership submodule is run to select a preliminary car ownership level for calculation of accessibilities for location choice. The submodule uses the same variables as the full car-ownership submodule except for the work/university/school-specific accessibilities that are used in the full car-ownership submodule. The work and school location submodule simulates each worker’s choice of work location, taking into account many factors, including ease of travel and the number of employees by occupation type in each location. The submodule also simulates each student’s choice of school, taking into account factors that include the distance from home to school, school enrollment, and district boundaries. The results from this step affect later travel choices significantly because of the prominent role that workplace and school usually play in the itinerary of workers and students.
Step 3: Determine Certain Mobility Characteristics of Individuals and Households

This step includes a few submodules. The full car-ownership submodule predicts the number of automobiles each household owns; the toll transponder ownership submodule predicts whether each household owns a toll transponder based on the aggregate characteristics of the zone and household car ownership (given NextOS and other technology advancements and policies, the ownership could be ubiquitous in future years); the free parking eligibility submodule predicts whether worker parking costs are employer reimbursed; and the telework frequency submodule predicts a worker’s occasional telework frequency. The car ownership submodule assigns each household zero cars, one car, two cars, three cars, or four or more cars, taking into account a number of criteria, including household size, income, number of drivers, and how easy it is to reach destinations from the household’s place of residence. ABM2+ includes two types of telework: permanent and occasional telework. Permanent telework is modeled in the work-from-home submodule, while the impact of occasional telework is reflected in daily activity pattern, non-mandatory tour frequency, and non-mandatory tour stop frequency submodules mentioned in the following sections. This step sets certain mobility characteristics that influence how people travel.

Step 4: Schedule the Day

The fourth step begins by predicting a “daily activity” pattern for each individual. A daily activity pattern is a theme that dictates an individual’s schedule. A “mandatory” pattern means that an individual travels to work and/or school, then schedules other activities around work/school. An “at-home” pattern means that an individual’s daily schedule involves no travel in the region. A “nonmandatory” pattern means that an individual’s daily schedule involves traveling, but only to destinations other than work or school. The pattern type of other household members influences an individual’s daily pattern type. For example, if a child stays home from school, a working parent might be more likely to stay home from work as well.

Once the submodule selects an individual’s daily activity pattern, it schedules the tours that he or she will take. The ABM2+ deals with three main categories of tours: (1) mandatory tours; (2) joint tours; and (3) non-mandatory tours. Mandatory tours have work or school as the primary destination. Joint tours involve out-of-home activities that multiple members of a household partake in together. Non-mandatory tours involve purposes other than work or school that an individual undertakes independent of other members of his or her household. The submodule schedules each tour type by predicting how many tours of that type there are, who will participate in the tour, where the main destination is, and when to depart and arrive (see Figure C.3).
For individuals assigned a “mandatory” activity pattern, the submodule first assigns the number of work tours and/or school tours they will make. After the number of these mandatory tours has been determined, the submodule selects the time of departure from and arrival back home for each tour.

After scheduling the mandatory tours, the submodule calculates time remaining for other tours. Remaining intervals of time are called “residual time windows,” and other tours can only be scheduled in these open slots (see Figure C.4 for an example) to guarantee temporal consistency.

In the time remaining after mandatory tours are scheduled, the submodule determines the number of joint tours to be made for each household. It only schedules joint tours in the time windows that overlap between individuals after it accounts for mandatory activities. After the number and purpose of these joint tours has been determined, the submodule decides which household members will participate in each joint tour and whether the joint tour must involve a combination of children and adults. The submodule then chooses a specific destination for the tour and the specific times when tour participants will depart from and arrive back home together. Next, “nonmandatory” tours are scheduled. For each household, the submodule decides what other tours need to be made for the purpose of household “maintenance” activities such as shopping. These tours are assigned to specific household members to carry out individually. For the person who is assigned each maintenance tour, the model selects a specific destination and schedules the tour to take place in a time window that mandatory tours and joint tours have left open. Finally, in what time remains, the model decides whether each
individual will take non-mandatory “discretionary” tours. These low-priority tours involve activities related to recreation, eating out, and social functions. Discretionary tours can only take place in time windows that remain after all other tours have been scheduled. The submodule chooses a specific destination and departure/arrival combination for each discretionary tour a person makes.

**Step 5: Make Tour- and Trip-Level Decisions**

The ABM2+ then selects more detailed characteristics of each tour for every traveler. This step fills in travel details after the major aspects of the day have been scheduled. Tour characteristics that need to be determined include: primary mode of the tour, how many times to stop, where to stop, and when to depart from each stop to continue the tour. Figure C.5 includes the available modes and mode hierarchy. After tour characteristics are set, the submodule determines the mode of each trip (conditional upon tour mode). Recall that trips are segments of tours that have a given origin and destination. If the trip mode involves an automobile and the destination is a parking-constrained area, then the model chooses a parking location for the traveler at the trip destination.
The ABM2+ has three access modes to transit (walk, Park & Ride, and Kiss & Ride including TNC to transit) and three transit sets (local bus only, premium transit only, and local bus and premium transit sets), for nine total demand classes by five TOD. These classes are assigned by slices, one at a time, to produce the total transit passenger flows on the network and total transit ridership forecasts.

**Special Market Models**
Besides the resident travel model, ABM2+ includes a few special market models: crossborder model, San Diego airport ground access model, CBX terminal model, visitor model, external models, commercial vehicle model, and external heavy truck model.

**Crossborder Model**
The model measures the impact of Mexico resident travel on the San Diego transport network. The model accounts for Mexico resident demand (such as auto volume, transit boarding, and toll usage) for transportation infrastructure in San Diego County. It also forecasts border crossings at each current and potential future border-crossing station. The model is based on the 2010 SANDAG Cross-Border Survey, Mexico resident border crossings into the United States, and their travel patterns within the United States. Data were collected at the three border-crossing stations: San Ysidro, Otay Mesa, and Tecate.
San Diego Airport Ground Access Model
The model captures the demand of airport travel on transportation facilities in San Diego County, a model of travel to and from the airport for arriving and departing passengers. It allows SANDAG to test the impacts of various parking price and supply scenarios at the airport. The model is based on the 2008 San Diego International Airport survey of airport passengers in which data were collected on their travel to the airport prior to their departure.

Cross Border Xpress Terminal Model
The CBX terminal is a unique facility that provides access to Tijuana International Airport from the United States via a pedestrian bridge. The terminal provides a much faster border crossing than is available at either San Ysidro or Otay Mesa, especially for returning passengers. In order to use the facility, each traveler must have a Tijuana International Airport boarding pass and pay a fee to cross each direction. The terminal offers parking, rental car services, airline check-in services, duty-free shopping, and dining. It opened in December 2015.

Visitor Model
The visitor model captures the demand of visitor travel on transportation facilities in San Diego County. The model is estimated based on the 2011 SANDAG Visitor Survey of airport passengers and hotel guests in which data were collected on their travel while visiting San Diego.

External Models
The external travel models predict characteristics of all vehicle trips and selected transit trips crossing the San Diego County border. This includes both trips that travel through the region without stopping and trips that are destined for locations within the region.

The external–external, external–internal, and internal–external trips in San Diego County were segmented into the following trip types:

- **US–US**: External–external trips whose production and attraction are both in the United States, but not in San Diego County
- **US–MX**: External–external trips with one trip end in the United States and the other in Mexico
- **US–SD**: External–internal trips with a production elsewhere in the United States and an attraction in San Diego County
- **MX–SD**: External–internal trips with a production in Mexico and an attraction in San Diego County (covered by the Mexico resident crossborder model)
- **SD–US**: Internal–external trips with a production in San Diego and an attraction elsewhere in the United States
- **SD–MX**: Internal–external trips with a production in San Diego County and an attraction in Mexico
**External Heavy Truck Model**

The external heavy truck model predicts truck flows into, out of, and through San Diego County. The model is based upon a dataset created by the Bureau of Transportation Statistics and the Federal Highway Administration known as the Freight Analysis Framework (FAF). The FAF integrates data from a variety of sources to create a comprehensive picture of freight movement among states and major metropolitan areas by all modes of transportation. The model utilizes FAF4 data, which is based on the 2012 Commodity Flow Survey, and provides forecasts through 2045.

**Commercial Vehicle Model**

Commercial vehicle model is a disaggregated tour-based model developed in 2014. This model was based upon a local commercial vehicle survey and replaces the aggregate intraregional Heavy-Duty Truck Model (HDTM) and nonfreight commercial vehicle components of the original aggregate commercial vehicle model. The internal/external component of the HDTM was retained in the new model system but was updated to FAF4 data.

**Trip Assignment**

The final steps of the SANDAG ABM2+ are to assign the trip demand onto the roadway and transit networks. Assignments are run for the five time periods identified in Table C.3.

**Traffic Assignment**

The traffic assignment for the ABM2+ is a 15-class assignment with generalized cost by five times of day. Auto vehicle classes are broken out by VOT for low-, medium-, and high-income groups, respectively. The 15 classes are drive-alone non-transponder, drive-alone transponder, shared ride 2, and shared ride 3+ by three VOT bins and heavy truck by three weight classes: light-heavy, medium-heavy, and heavy-heavy.

The traffic assignment model works by finding roads that provide the shortest travel impedance between each zone pair. Trips between zone pairs are then accumulated on road segments making up minimum paths. Highway impedances consider posted speed limits, signal delays, congestion delays, and costs. The model computes congestion delays for each segment based on the ratio of the traffic volume to roadway capacity. Motorists may choose different paths during peak hours, when congestion can be heavy, and off-peak hours, when roadways are typically free flowing. For this reason, traffic is assigned separately for five time periods (as defined in the Spatial and Temporal Resolution section). Vehicle trip tables for each scenario reflect increased trip-making due to population growth and variations in travel patterns due to the alternative transportation facilities/networks proposed. Customized programs process outputs from traffic assignment and generate total VMTs by vehicle class, and percentage of VMTs by speed bin and by vehicle class. This information is input to the EMFAC program to generate emissions summaries.
Transit Assignment

The transit assignment uses a headway-based approach, where the average headway between vehicle arrivals for each transit line is known, but exact schedules are not. Passengers and vehicles arrive at stops randomly, and passengers choose their travel itineraries considering the expected average waiting time.

The Emme extended transit assignment is based on the concept of optimal strategy but extended to support a number of behavioral variants. The optimal strategy is a set of rules that define sequence(s) of walking links and boarding and alighting stops, producing the minimum expected travel time (generalized cost) to a destination. At each boarding point, the strategy may include multiple possible attractive transit lines with different itineraries. A transit strategy will often be a tree of options, not just a single path. A line is considered attractive if it reduces the total expected travel time by its inclusion. The demand is assigned to the attractive lines in proportion to their relative frequencies.

Model Inputs

The SANDAG ABM2+ utilizes a variety of data as inputs. Besides the Series 14 Regional Growth Forecast, SCS land use pattern, inputs (used to provide existing and planned land use and demographic characteristics), there are three major inputs: highway networks used to describe existing and planned roadway facilities, transit networks used to describe existing and planned public transit service, and an active transportation network used to describe nonmotorized bicycle and pedestrian facilities.

The regionally significant projects and the years they are expected to open to traffic for each analysis year are documented in Tables C.11 through C.14. The design concept and scope of projects allow adequate model representation to determine intersections with regionally significant facilities, route options, travel times, transit ridership, and land use. The VMT for federal projects that are not regionally significant is also accounted for in the regional emissions analysis.

Highway Networks

The regional highway networks in the 2021 Regional Plan include all roads classified by local jurisdictions in their general plan circulation elements. These roads include freeways, expressways, and the Regional Arterial System (RAS). The RAS consists of all conventional state highways, prime arterials, and selected major streets. In addition, some local streets are included in the networks for connectivity between TAZs.

The route improvements and additions in the 2021 Regional Plan and 2021 RTIP Amendment No. 06 are developed to provide adequate travel service that is compatible with adopted regional policies for land use and population growth. All regionally significant projects are included in the quantitative emissions analysis. These include all state highways, all proposed national highway system routes, all regionally significant arterials, and all “other principal arterials” functionally classified by the Federal Highway Administration. These include both federal and non-federal regionally significant projects.
The networks also account for programs intended to improve the operation of the highway system, including high-occupancy vehicle (HOV) lanes, Managed Lanes, and ramp metering. Existing and proposed toll facilities also are modeled to reflect time, cost, and capacity effects of these facilities.

In addition, several Managed/HOV lanes are included in the 2021 Regional Plan (Tables C.11–C.14, located at the end of this appendix). Managed Lanes offer priority access to people using transit, carpooling, motorcycles, or vanpooling along with emergency vehicles and some low-emission vehicles with appropriate decals. Additionally, one-lane HOV facilities that operate as two-person carpool lanes in the earlier years of the 2021 Regional Plan transition to Managed Lanes by 2035. It is assumed that the excess capacity not utilized by carpools and transit on these facilities would be managed so that single-occupant vehicles could use these lanes under a pricing mechanism. Traffic flows would be managed so that the facility would operate at level of service D (LOS D) or better.

SANDAG maintains a master transportation network from which a specific year network, between the years 2010 and 2050, can be built.

For air quality conformity analyses of the 2021 Regional Plan and 2021 RTIP Amendment No. 06 using emissions budgets from the 2020 SIP, SANDAG built and verified six highway networks (2023, 2026, 2029, 2032, 2040, and 2050) from the master transportation network.

A list of the major highway and near-term regional arterial projects included in the conformity analysis, along with information on phasing for their implementation, are included in Tables C.11 through C.14. Locally funded, regionally significant projects have also been or are included in the air quality conformity analysis. These projects are funded with TransNet Extension funds—a 40-year, half-cent local sales tax extension approved by voters in 2004 that expires in 2048—and other local revenue sources.

**Transit Networks**

SANDAG also maintains transit network datasets for existing and proposed transit systems. Most transit routes run over the same streets, freeways, HOV lanes, and ramps used in the highway networks. The only additional facilities that are added to the master transportation network for transit modeling purposes are as follows:

- Rail lines used by commuter rail, Trolleys, and streetcars
- Streets used by buses that are not part of local general plan circulation elements

*Rapid* service has stop spacing similar to commuter (Freeway *Rapid*) or light rail (Arterial *Rapid*) rail stations and operating characteristics midway between rail and bus service. *Rapid* service is provided by advanced design buses operating on HOV lanes or Managed Lanes, some at-grade transit ways, and surface streets with priority transit systems.
Bus speeds assumed in the transit networks are derived from modeled highway speeds and reflect the effects of congestion. Higher bus speeds may result for transit vehicles operating on highways with HOV lanes and HOV bypass lanes at ramp meters compared to those routes that operate on highways where these facilities do not exist.

In addition to transit travel times, transit fares are required as input to the mode choice model. A customized procedure using the traffic assignment software replicates the San Diego region's fare policies for riders (seniors, disabled, students), which differ among:

- Local buses, which collect a flat fare of $2.50 (COASTER Connection buses are free, and some future shuttle routes charge $1)
- Trolleys and SPRINTERS, which charge $2.50 for all trips
- Commuter rail (COASTER), which has a zone-based fare of between $5 and $6.50 currently and an assumed flat fare (along with a future Tier 1 high-speed commuter rail mode) of $6
- Express Freeway Rapid routes, which are assumed to charge $5
- Rapid Bus routes, which are assumed to charge $2.50

Transit fares reflect ridership costs at the time the transportation model was developed. Fares are expressed in 2010 dollars and are held constant in inflation-adjusted dollars over the forecast period.

Near-term transit route changes are drawn from the Coordinated Plan, which was produced in cooperation with the region's transit agencies. Longer-range improvements are proposed as a part of the 2021 Regional Plan development and other transit corridor studies. In addition to federal- and state-funded projects, locally funded transit projects that are regionally significant have been included in the air quality conformity analysis of the 2021 Regional Plan and 2021 RTIP Amendment No. 06.

Active Transportation Networks

SANDAG maintains an all-street active transportation network including existing and planned bike projects to support bike project evaluation and impact analysis. Based on the proposed bike projects in the regional bikeway system developed through Riding to 2050: San Diego Regional Bike Plan, SANDAG generates year-specific active transportation networks and uses these networks to create accessibility measures from MGRA to MGRA for walking and biking and from TAZ to TAZ for biking modes. These active transportation accessibility measures are inputs to the SANDAG ABM2+ to simulate people's choice of travel mode and choice of bike routes.

The active transportation network has unique characteristics that account for facility type, bike treatments, and elevation change. The active transportation networks include five classification types for bike facilities in the regional bikeway system: Class I: bike paths,
Class II: bike lanes, Class III: bike routes, Class IV: cycle tracks, and “Class V”: bike boulevards. “Class V” is an internal designation and not a California vehicle code facility type.

Once network coding is completed, the ABM2+ is run for the applicable scenarios: 2023, 2026, 2029, 2032, 2040 and 2050 for the 2020 SIP.

Data Sources

Aside from network inputs, SANDAG relies on several survey datasets to estimate and calibrate the model parameters. The most important survey data are household travel survey data. The latest household travel survey conducted for SANDAG was the 2016–2017 Household Travel Behavior Survey (HTS2016) with smartphone-based travel diaries as the primary means of travel data collection. Since 1966, consistent with the state of the practice for the California Household Travel Survey and National Household Travel Survey, SANDAG and Caltrans conduct a comprehensive travel survey of San Diego County every ten years. HTS2016 surveyed 6,139 households in San Diego County. The survey asked all households with smartphones to participate using the smartphone-based GPS travel diary and survey app (rMove) for one week and accommodated participating households without smartphones by allowing them to complete their one-day travel diary online or by calling the study call center.

As part of a joint survey effort with the Metropolitan Transportation Commission and the Southern California Association of Governments funded by California Senate Bill 1 (Beall, 2017) (SB 1), SANDAG conducted a TNC survey in 2019 to better understand the TNC usage in San Diego region. The TNC survey includes 2,800 complete persons, 17,340 completed person-days, and 1,578 TNC trips. SANDAG used the 2019 TNC survey data to estimate TNC single and pooled use in the mode choice model.

Additional data needed for the mode choice components of the ABM2+ come from a transit on-board survey. The most recent SANDAG survey of this kind is the 2015 Transit On-Board Survey (OBS2015). OBS2015 collected data on transit trip purpose, origin and destination address, access and egress mode to and from transit stops, the on/off stop for surveyed transit routes, number of transit routes used, and demographic information.

Population synthesis requires two types of data: individual household and person Census records from San Diego County and aggregate data pertaining to the sociodemographic characteristics of each zone in the region. The first type of data is available from the Public Use Microdata Sample (PUMS), a representative sample of complete household and person records that is released with the Census and American Communities Survey. The second type of data is from the Census for the base year and from land use forecasts for future years.

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6 A complete person-day is when a person completes all trip surveys and the daily survey for a given travel day. A person is considered complete if they have at least one complete person-day.
Table C.8 lists data sources mentioned above along with other necessary sources of data. Modeling parking location choice and employer reimbursement of parking cost depends on parking survey data collected from 2010 into early 2011 as well as a parking supply inventory. The transponder-ownership sub-model requires data on transponder users. Data needed for model validation and calibration include traffic counts, transit-boarding data, Census Transportation Planning Package (CTPP) data, Caltrans Performance Measurement System (PeMS), and Highway Performance Monitoring System (HPMS) data.

Table C.8: ABM2+ Input Data

<table>
<thead>
<tr>
<th>SANDAG Surveys</th>
<th>Outside Data Sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household Travel Behavior Survey (2016)</td>
<td>San Diego International Airport Air Passenger Survey (2009)</td>
</tr>
<tr>
<td>Commute Behavior Survey (2018)</td>
<td>CTPP</td>
</tr>
<tr>
<td>Taxi Passenger Survey (2009)</td>
<td>PUMS</td>
</tr>
<tr>
<td>Border Crossing Survey (2011)</td>
<td>Jurisdiction annual traffic counts (2016)</td>
</tr>
<tr>
<td>Commercial Vehicles Survey (2011)</td>
<td></td>
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<tr>
<td>Vehicle Classification &amp; Occupancy (2006)</td>
<td></td>
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<tr>
<td>Beach Intercept Survey (2017)</td>
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<td></td>
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</table>

Motor Vehicle Emissions Modeling

Emissions Model

On August 15, 2019, the U.S. EPA approved EMFAC2017 v1.0.2 for use in conformity determinations and allowed for a two-year grace period for transition from the previous emission model (EMFAC2014) (84 FR 41717). Consistent with 40 CFR 93.111, EMFAC2017 v1.0.2, as the latest emissions model, was used to project the regional emissions for the 2021 Regional Plan conformity determination and 2021 RTIP Amendment No. 06
conformity analysis. To account for changes resulting from Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program, CARB released EMFAC Off-Model Adjustment Factors on November 20, 2019. These adjustments modify EMFAC2017 outputs for the vehicle classes affected by the SAFE Vehicles Rule.

Projections of daily regional emissions were prepared for reactive organic gases (ROG) and nitrogen oxides (NOx).

The following process emissions are generated for each pollutant:

- **All pollutants:** Running Exhaust, Idling Exhaust, Starting Exhaust, Total Exhaust
- **ROG and total organic gases:** Diurnal Losses, Hot-Soak Losses, Running Losses, Resting Losses, Total Losses

EMFAC2017 models multiple vehicle categories, including the following:

- Passenger cars
- Motor homes
- Medium-duty trucks
- Medium-heavy-duty trucks
- School buses
- Motor coaches
- Motorcycles
- Light-duty trucks
- Light-heavy-duty trucks
- Heavy-heavy-duty trucks
- Urban buses
- Other bus types

EMFAC2017 includes updated motor vehicle fleet information from the California Department of Motor Vehicles for 2013–2016 and a new module that improves the characterization of activity and emissions from transit buses. Additionally, EMFAC2017 allows users to estimate emissions of natural gas–powered vehicles in addition to gasoline- and diesel-powered vehicles.

**Regional Emissions Forecasts**

Regional travel demand forecasts were initiated in June 2020. Output from the ABM2+ was then summarized to create EMFAC2017 inputs for emissions modeling.

Beginning in June 2020, SANDAG prepared countywide forecasts of average weekday ROG and NOx emissions for 2023, 2026, 2029, 2032, 2040, and 2050 for the 2020 SIP using the EMFAC2017 v1.0.2 model. ROG and NOx emissions are based upon the summer season.

**2008 Eight-Hour Ozone Standard**

Effective October 19, 2021, the U.S. EPA found the motor vehicle emissions budgets from the 2008 Eight-Hour Ozone Attainment Plan for San Diego County (2020 SIP) adequate for transportation conformity purposes for the 2008 ozone NAAQS (86 FR 54692).
Severe Nonattainment Area classification established 2026 as the attainment year and 2023 as a reasonable further progress demonstration year for the 2008 Eight-Hour Ozone Standard. The analysis years were selected to comply with 40 CFR 93.106(a)(l) and 93.118(a). According to these sections of the Conformity Rule, analysis years must include reasonable further progress demonstration years (2023), attainment year (2026), the horizon year of the plan’s forecast period (2050), and no more than ten years between analysis years (2032, 2040). Additionally, the first horizon year (2023) must be within ten years from the base year used to validate the regional transportation model (2016).

2015 Eight-Hour Ozone Standard
Effective October 19, 2021, the U.S. EPA found the motor vehicle emissions budgets from the 2015 Eight-Hour Ozone Attainment Plan for San Diego County (2020 SIP) adequate for transportation conformity purposes for the 2015 ozone NAAQS (86 FR 54692).

Severe Nonattainment Area classification established 2032 as the attainment year for the 2015 Eight-Hour Ozone Standard. The 2020 SIP established air quality budgets for the 2015 ozone standard. The 2020 SIP included a voluntary Nonattainment Area classification change from Moderate to Severe Nonattainment Area for the 2015 Eight-Hour Ozone Standard. The new classification established 2032 as the attainment year and 2023, 2026, and 2029 as reasonable further progress demonstration years. The analysis years were selected to comply with 40 CFR 93.106(a)(l) and 93.118(a). According to these sections of the Conformity Rule, analysis years must include reasonable further progress demonstration years (2023, 2026, 2029), attainment year (2032), the horizon year of the plan’s forecast period (2050), and no more than ten years between analysis years (2040).

Emissions Modeling Results
An emissions budget is the part of the SIP that identifies emissions levels necessary for meeting emissions reduction milestones, attainment, or maintenance demonstrations. To determine conformity of the 2021 Regional Plan and to conduct the conformity analysis of the 2021 RTIP Amendment No. 06 the emission analysis described in the Regional Emissions Forecast section was used.

Table C.9 shows that the projected ROG and NOx emissions from the 2021 Regional Plan and 2021 RTIP Amendment No. 06 are below the ROG and NOx budgets from the 2020 SIP for both the 2008 and 2015 ozone standards.
Table C.9: 2021 Regional Plan and 2021 RTIP Amendment No. 06: Conformity Analysis for the 2008 and 2015 Eight-Hour Ozone Standards (EMFAC2017)

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Weekday Vehicle Starts (1,000s)</th>
<th>Average Weekday Vehicle Miles (1,000s)</th>
<th>SIP Emissions Budget Tons/Day</th>
<th>ROG Emissions Tons/Day</th>
<th>SIP Emissions Budget Tons/Day</th>
<th>NOx Emissions Budget Tons/Day</th>
</tr>
</thead>
<tbody>
<tr>
<td>2023</td>
<td>11,277</td>
<td>85,602</td>
<td>13.6</td>
<td>13.4</td>
<td>19.3</td>
<td>17.3</td>
</tr>
<tr>
<td>2026</td>
<td>11,542</td>
<td>85,534</td>
<td>12.1</td>
<td>11.6</td>
<td>17.3</td>
<td>14.9</td>
</tr>
<tr>
<td>2029</td>
<td>11,889</td>
<td>86,252</td>
<td>11.0</td>
<td>10.3</td>
<td>15.9</td>
<td>13.6</td>
</tr>
<tr>
<td>2032</td>
<td>12,109</td>
<td>86,091</td>
<td>10.0</td>
<td>9.2</td>
<td>15.1</td>
<td>12.6</td>
</tr>
<tr>
<td>2040</td>
<td>12,807</td>
<td>87,374</td>
<td>10.0</td>
<td>7.3</td>
<td>15.1</td>
<td>11.6</td>
</tr>
<tr>
<td>2050</td>
<td>13,469</td>
<td>88,414</td>
<td>10.0</td>
<td>6.7</td>
<td>15.1</td>
<td>11.9</td>
</tr>
</tbody>
</table>

Note: Emissions budgets from the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (October 2020) were found adequate for transportation conformity purposes by U.S. EPA, effective October 19, 2021.

Exempt Projects

40 CFR Section 93.126 exempts certain highway and transit projects from the requirement to determine conformity. The categories of exempt projects include safety, mass transit, air quality (ridesharing and bicycle and pedestrian facilities), and other (such as planning studies).

Table C.10 illustrates the exempt projects considered in the Revenue-Constrained 2021 Regional Plan and 2021 RTIP Amendment No. 06. This table shows short-term exempt projects. Additional unidentified projects could be funded with revenues expected to be available from the continuation of existing state and federal programs.
Table C.10: Exempt Projects

<table>
<thead>
<tr>
<th>Project/Program Description</th>
<th>Project/Program Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bikeway, Rail Trail, and Pedestrian Projects</td>
<td></td>
</tr>
<tr>
<td>Bayshore Bikeway</td>
<td>San Diego River Trail: Stadium Segment</td>
</tr>
<tr>
<td>Bay-to-Ranch Bikeway</td>
<td>I-805 Bicycle Corridor</td>
</tr>
<tr>
<td>Border to Bayshore Bikeway</td>
<td>Kearny Mesa - Beaches Bicycle Corridor</td>
</tr>
<tr>
<td>Camp Pendleton Trail</td>
<td>Mid-County Bikeway</td>
</tr>
<tr>
<td>Carlsbad - San Marcos Bicycle Corridor</td>
<td>Mira Mesa Bicycle Corridor</td>
</tr>
<tr>
<td>Central Avenue Bikeway</td>
<td>Uptown Bikeways: Washington Street and Mission Valley Bikeways</td>
</tr>
<tr>
<td>Central Coast Bicycle Corridor</td>
<td>National City – Highland Avenue Community Corridor</td>
</tr>
<tr>
<td>Central Mobility Bikeway (Coastal Rail Trail: Pacific Highway)</td>
<td>North Park/Mid-City Bikeways</td>
</tr>
<tr>
<td>Chula Vista Greenbelt</td>
<td>Oceanside – Bicycle Master Plan</td>
</tr>
<tr>
<td>Downtown to Imperial Avenue Bikeway</td>
<td>Otay Mesa Port of Entry Pedestrian/Bicycle Facilities</td>
</tr>
<tr>
<td>North Park/Mid-City Bikeway: Howard – Orange Bikeway</td>
<td>Park Boulevard – Downtown Mobility Plan</td>
</tr>
<tr>
<td>Clairemont – Centre City Bicycle Corridor</td>
<td>Pershing Bikeway</td>
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<tr>
<td>Coastal Rail Trail</td>
<td>San Diego Regional Bicycle Plan</td>
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<tr>
<td>East County Northern Bicycle Loop</td>
<td>San Diego River Trail</td>
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<tr>
<td>East County Southern Bicycle Loop</td>
<td>San Luis Rey River Trail</td>
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<tr>
<td>El Camino Real Bicycle Corridor</td>
<td>Santee – El Cajon Bicycle Corridor</td>
</tr>
<tr>
<td>El Portal Pedestrian and Bicycle Underpass</td>
<td>SR 15 Bikeway</td>
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<tr>
<td>Encinitas – San Marcos Bicycle Corridor</td>
<td>SR 52 Bikeway</td>
</tr>
<tr>
<td>Escondido Creek Bike Path Bridge and Bikeway</td>
<td>SR 125 Bicycle Corridor</td>
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<tr>
<td>Coastal Rail Trail: Rose Creek</td>
<td>SR 905 Bicycle Corridor</td>
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<tr>
<td>North Park/Mid-City Bikeways: University Bikeway</td>
<td>Tecate International Border Crossing Pedestrian Facilities</td>
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<tr>
<td>Inland Rail Trail</td>
<td>Vista Way Bicycle Connector</td>
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</tbody>
</table>
### Exempt Projects

<table>
<thead>
<tr>
<th>Project/Program Description</th>
<th>Project/Program Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Safety Improvement Program</strong></td>
<td><strong>Transportation Systems and Demand Management</strong></td>
</tr>
<tr>
<td>Bridge Rehabilitation/Preservation/Retrofit</td>
<td>Traveler Information System</td>
</tr>
<tr>
<td>Collision Reduction</td>
<td>Bus on Shoulder Service</td>
</tr>
<tr>
<td>Emergency Response</td>
<td>Compass Card</td>
</tr>
<tr>
<td>Hazard Elimination/Safe Routes to School</td>
<td>FasTrak®</td>
</tr>
<tr>
<td>Highway Maintenance</td>
<td>Freeway Service Patrol</td>
</tr>
<tr>
<td>Safety Improvement Program</td>
<td>Vehicle Automation</td>
</tr>
<tr>
<td>Roadway/Roadside Preservation</td>
<td>Regional Rideshare Program</td>
</tr>
<tr>
<td>Smart Growth Incentive Program</td>
<td>Multimodal Integration and Performance-Based Management</td>
</tr>
<tr>
<td>Safe Routes to Transit</td>
<td>Intelligent Transportation System (ITS) for Transit</td>
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<td>Safe Routes to School</td>
<td>ITS Operations</td>
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**Transit Terminals**

<table>
<thead>
<tr>
<th>Transit Terminals</th>
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</thead>
<tbody>
<tr>
<td><strong>Central Mobility Hub/Airport Intermodal Transit Center/Terminal</strong></td>
</tr>
<tr>
<td><strong>San Ysidro Intermodal Transit Center/Terminal</strong></td>
</tr>
<tr>
<td><strong>Electronic Payment Systems and Universal Transportation Account</strong></td>
</tr>
<tr>
<td><strong>Various Traffic Signal Optimization/Prioritization</strong></td>
</tr>
<tr>
<td><strong>Transit Infrastructure Electrification</strong></td>
</tr>
<tr>
<td><strong>Employer Services and Outreach</strong></td>
</tr>
<tr>
<td><strong>Flexible Fleet Pilots</strong></td>
</tr>
<tr>
<td><strong>Regional Electric Vehicle Charging Incentive Program</strong></td>
</tr>
<tr>
<td><strong>Commuter Services and Bike Program</strong></td>
</tr>
<tr>
<td><strong>Mobility Hubs</strong></td>
</tr>
<tr>
<td><strong>Active Traffic and Demand Management</strong></td>
</tr>
<tr>
<td><strong>Shared Mobility Services</strong></td>
</tr>
</tbody>
</table>

**Implementation of Transportation Control Measures**

There are four federally approved Transportation Control Measures (TCMs) that must be implemented in San Diego, which the SIP refers to as transportation tactics. They include ridesharing, transit improvements, traffic flow improvements, and bicycle facilities and programs.
These TCMs were established in the 1982 SIP, which identified general objectives and implementing actions for each tactic. The TCMs have been fully implemented. 7 Ridesharing, transit, bicycling, and traffic flow improvements continue to be funded, although the level of implementation established in the SIP has been surpassed.

Interagency Consultation Process and Public Input

The consultation process followed to prepare the air quality conformity analysis for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 complies with the San Diego Transportation Conformity Procedures adopted in July 1998. In turn, these procedures comply with federal requirements under 40 CFR Part 93. Interagency consultation involves SANDAG (as the MPO for San Diego County), the SDAPCD, Caltrans, CARB, U.S. DOT, and U.S. EPA.

Consultation is a three-tier process that:

1. Formulates and reviews drafts through a conformity working group
2. Provides local agencies and the public with opportunities for input through existing regional advisory committees and workshops
3. Seeks comments from affected federal and state agencies through participation in the development of draft documents and circulation of supporting materials prior to formal adoption

SANDAG consulted on the development of the air quality conformity analysis of the 2021 Regional Plan and 2021 RTIP Amendment No. 06 at meetings of the CWG, as follows:

- On June 5, 2019, SANDAG staff presented information on the 2021 Regional Plan schedule and initial conformity criteria and procedures, including revenue-constrained financial assumption, regional growth forecast, travel demand model, latest emission model, emission budget, transportation control measures, and public involvement and outreach.
- On November 4, 2020, SANDAG staff presented information and sought feedback on the Regional Vision for the 2021 Regional Plan.
- On January 6, 2021, SANDAG staff presented additional information about the criteria and procedures to be followed. The following conformity criteria and procedures were discussed: the regional growth forecast, SCS land use pattern; latest emission model; emissions budgets; and public involvement and outreach.
- On April 6, 2021, SANDAG distributed the draft conformity analysis for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 to the CWG for interagency consultation. The CWG review period concluded on May 7, 2021.

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7 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County, San Diego County Air Pollution Control District, October 2020.
On April 7, 2021, staff presented the list of proposed draft transportation projects, exempt projects, revenue strategies and the regional growth forecast, SCS land use pattern for the 2021 Regional Plan.

On May 5, 2021, the CWG discussed the conformity analysis for the draft 2021 Regional Plan, conformity determination, and conformity analysis for the 2021 RTIP Amendment No. 06.

On May 28, 2021, the draft 2021 Regional Plan, including the draft air quality conformity analysis and the SCS, was released for public review and comments. The comment period on the draft 2021 Regional Plan concluded on August 6, 2021.

Two public hearings were held on the draft 2021 Regional Plan and its conformity determination on July 16, 2021, and July 23, 2021.

Based on comments received from the public and member agencies, refinements were made to the proposed final 2021 Regional Plan network. On September 24, 2021, SANDAG distributed the final draft conformity analysis for the 2021 Regional Plan and 2021 RTIP Amendment No. 06 to the CWG for interagency consultation.

On October 6, 2021, the CWG discussed the conformity analysis for the proposed final 2021 Regional Plan, conformity determination, and conformity analysis for the 2021 RTIP Amendment No. 06.

On December 10, 2021, the Board will be asked to adopt a Resolution adopting the air quality conformity determination, finding that the Revenue Constrained Plan is in conformance with the SIP for air quality; adopting the 2021 Regional Plan and its supporting analyses.

Members of the public were welcomed to provide comments at meetings of the CWG, and the Board.

2021 Regional Plan Projects

This section contains the capacity-increasing projects included in the 2021 Regional Plan. The tables include the conformity analysis year, project details, and estimated cost ($2020). Tables C.11, C.12, C.13, and C.14 include the projects for the 2021 Regional Plan by 2020 SIP Air Quality Phasing. Table C.11 has the major goods movement, complete corridor, and transit leap projects by each regional corridor. Figure C.6 shows the location of each corridor within the region. Table C.12 lists the significant rural projects. Table C.13 includes the arterial capacity-increasing projects, and Table C.14 lists additional transit projects that did not apply to the prior tables.
Figure C.6: Corridor Geographies
### Table C.11: Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020) Millions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conformity Analysis Year</td>
<td>Project ID</td>
<td>Project Name</td>
<td>Description</td>
<td>Cost ($2020) Millions</td>
</tr>
<tr>
<td>South Bay to Sorrento (SB2S)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2023</td>
<td>GM01</td>
<td>Goods Movement: Border</td>
<td>Otay Mesa Port of Entry (POE) Commercial Vehicle Enforcement Facility (CVEF) Modernization</td>
<td>N/A</td>
</tr>
<tr>
<td>2026</td>
<td>CC045</td>
<td>Complete Corridor: Managed Lane (ML)/Goods Movement</td>
<td>SR 11/Otay Mesa East (OME) POE (Enrico Fermi to Mexico) -- to 4 toll lanes (T) + POE</td>
<td>SR 125</td>
</tr>
<tr>
<td>2026</td>
<td>GM02</td>
<td>Goods Movement: Border</td>
<td>OME POE Pilot Programs</td>
<td>N/A</td>
</tr>
<tr>
<td>2026</td>
<td>GM03</td>
<td>Goods Movement: Border</td>
<td>Otay Mesa Southbound Truck Route</td>
<td>N/A</td>
</tr>
<tr>
<td>2026</td>
<td>GM07</td>
<td>Goods Movement: Roadways</td>
<td>Regional Border Management System (RBMS) &amp; Tolling Equipment</td>
<td>N/A</td>
</tr>
<tr>
<td>2026</td>
<td>TL21</td>
<td>Transit Leap</td>
<td>Rapid 12 Phase 1</td>
<td>I-15, SR 94, SR 125, Central Mobility Hub (CMH)</td>
</tr>
<tr>
<td>2026</td>
<td>TL44</td>
<td>Transit Leap</td>
<td>Rapid 630</td>
<td>I-8; I-15; SR 94; Coast, Canyons, and Trails (CCT); CMH</td>
</tr>
<tr>
<td>2026</td>
<td>TL48</td>
<td>Transit Leap</td>
<td>Rapid 640</td>
<td>I-8, I-15, SR 94, CMH</td>
</tr>
<tr>
<td>2026</td>
<td>TL53</td>
<td>Transit Leap</td>
<td>Rapid 950 Phase 1</td>
<td>SR 125</td>
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<tr>
<td>2029</td>
<td>CC001</td>
<td>Complete Corridor: ML/Goods Movement</td>
<td>I-5 (SR 905 to H Street) 8 freeway lanes (F) to 6F+2ML</td>
<td>N/A</td>
</tr>
<tr>
<td>2029</td>
<td>CC002</td>
<td>Complete Corridor: ML/Goods Movement</td>
<td>I-5 (H Street to Pacific Highway) 8F to 6F+4ML</td>
<td>I-8, I-15, SR 94, CMH</td>
</tr>
<tr>
<td>2029</td>
<td>CC038</td>
<td>Complete Corridor: ML</td>
<td>SR 163 (I-8 to I-805) 8F to 6F+2ML</td>
<td>I-8, CMH</td>
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</table>
## Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020 Millions)</th>
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<tbody>
<tr>
<td>2029</td>
<td>CC039</td>
<td>Complete Corridor: ML</td>
<td>SR 163 (I-805 to SR 52)</td>
<td>8F to 6F+2ML</td>
<td>I-15, CCT</td>
<td>$27</td>
</tr>
<tr>
<td>2029</td>
<td>GM06</td>
<td>Goods Movement: Roadways</td>
<td>Harbor Drive 2.0</td>
<td>Designated Freight Route: Dedicated lanes (where feasible) and signal priority for truck freight along Harbor Drive between the Tenth Avenue Marine Terminal/Cesar Chavez Parkway, National City Marine Terminal, and connections to I-5; includes freight signal prioritization, queue jumps, delineators, and signage; generally aligned in the #1 lanes and median CMH</td>
<td>$32</td>
<td></td>
</tr>
<tr>
<td>2029</td>
<td>GM08</td>
<td>Goods Movement: Roadways</td>
<td>I-5 Working Waterfront Access</td>
<td>I-5 Working Waterfront Access Bottleneck Relief between SR 94 and SR 54</td>
<td>N/A</td>
<td>$50</td>
</tr>
<tr>
<td>2029</td>
<td>GM09</td>
<td>Goods Movement: Roadways</td>
<td>Vesta Bridge – Phase 1</td>
<td>Vesta Bridge Phase 1 and operational improvements SR 15, Main, Harbor, and 32nd Streets</td>
<td>N/A</td>
<td>$55</td>
</tr>
<tr>
<td>2029</td>
<td>TL12</td>
<td>Transit Leap/ Goods Movement</td>
<td>LRT S10</td>
<td>Blue Line (San Ysidro to University Town Center [UTC], grade separations at 28th Street, 32nd Street, E Street, H Street, Palomar Street, and Blue/Orange track connections at 12th/Imperial)</td>
<td>I-8, I-15, SR 94, CCT, CMH</td>
<td>$510</td>
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<tr>
<td>2029</td>
<td>TL22</td>
<td>Transit Leap</td>
<td>Rapid 12 Phase 2</td>
<td>Spring Valley to Downtown via Southeast San Diego (full version of Rapid)</td>
<td>I-15, SR 94, SR 125, CMH</td>
<td>$73</td>
</tr>
<tr>
<td>2029</td>
<td>TL25</td>
<td>Transit Leap</td>
<td>Rapid 41</td>
<td>Fashion Valley to UTC/UC San Diego via Linda Vista and Clairemont</td>
<td>I-8, CCT, CMH</td>
<td>$58</td>
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<tr>
<td>2029</td>
<td>TL28</td>
<td>Transit Leap</td>
<td>Rapid 120</td>
<td>Kearny Mesa to Downtown via Mission Valley</td>
<td>I-8, I-15, CCT, CMH</td>
<td>$109</td>
</tr>
<tr>
<td>2029</td>
<td>TL35</td>
<td>Transit Leap</td>
<td>Rapid 295</td>
<td>Spring Valley to Clairemont via La Mesa and Kearny Mesa</td>
<td>I-8, I-15, SR 94, SR 125, CCT</td>
<td>$91</td>
</tr>
<tr>
<td>2029</td>
<td>TL43</td>
<td>Transit Leap</td>
<td>Rapid 625</td>
<td>San Diego State University (SDSU) to Palomar Station via East San Diego, Southeast San Diego, National City</td>
<td>I-8, I-15, SR 94</td>
<td>$197</td>
</tr>
<tr>
<td>2029</td>
<td>TL46</td>
<td>Transit Leap</td>
<td>Rapid 637</td>
<td>North Park to 32nd Street Trolley Station via Golden Hill</td>
<td>I-8, I-15, SR 94</td>
<td>$103</td>
</tr>
<tr>
<td>2029</td>
<td>TL49</td>
<td>Transit Leap</td>
<td>Rapid 709</td>
<td>H Street Trolley Station to Millennia via H Street Corridor, Southwestern College</td>
<td>SR 125</td>
<td>$99</td>
</tr>
<tr>
<td>2029</td>
<td>TL59</td>
<td>Transit Leap</td>
<td>Rapid 950 Phase 2</td>
<td>Otay Mesa POE to Imperial Beach via SR 905 (full version of Rapid)</td>
<td>SR 125</td>
<td>$22</td>
</tr>
<tr>
<td>2032</td>
<td>CC005</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (I-805 to SR 56)</td>
<td>8F/14F+2HOV to 6F/12F+4ML</td>
<td>I-5 North Coast Corridor (NCC), SR 56</td>
<td>$25</td>
</tr>
</tbody>
</table>

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8 SANDAG will conduct a Blue Line Express Feasibility and Conceptual Engineering Study as a Near-Term Implementation Action (included in Appendix B: Implementation Actions).
## Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost (2020) Millions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2032 CC017</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-805 (Palm Avenue to H Street)</td>
<td>8F/8F+2ML to 6F+4ML</td>
<td>N/A</td>
<td>$46</td>
<td></td>
</tr>
<tr>
<td>2032 CC018</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-805 (H Street to I-15)</td>
<td>8F+2ML to 6F+4ML</td>
<td>I-15, SR 94</td>
<td>$163</td>
<td></td>
</tr>
<tr>
<td>2032 CC019</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-805 (SR 15 to I-8)</td>
<td>8F to 6F+4ML</td>
<td>I-8, I-15, SR 94</td>
<td>$96</td>
<td></td>
</tr>
<tr>
<td>2032 CC020</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-805 (I-8 to Mesa College Drive)</td>
<td>10F to 6F+4ML</td>
<td>I-8, I-15</td>
<td>$56</td>
<td></td>
</tr>
<tr>
<td>2032 CC021</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-805 (Mesa College Drive to Balboa Avenue)</td>
<td>8F to 6F+4ML</td>
<td>CCT</td>
<td>$58</td>
<td></td>
</tr>
<tr>
<td>2032 CC022</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-805 (Balboa Avenue, to Northbound Bypass Lane)</td>
<td>8F+2ML to 6F+4ML</td>
<td>CCT</td>
<td>$149</td>
<td></td>
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<tr>
<td>2032 CC063</td>
<td>Complete Corridor: Managed Lane Connector (MLC)</td>
<td>I-5 (I-805)</td>
<td>North to North and South to South</td>
<td>N/A</td>
<td>$84</td>
<td></td>
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<tr>
<td>2032 CC085</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (SR 52)</td>
<td>West to North and South to East</td>
<td>CCT</td>
<td>$149</td>
<td></td>
</tr>
<tr>
<td>2032 CCT14</td>
<td>Complete Corridor: Transit Operational Improvement</td>
<td>I-805 (Nobel Drive)</td>
<td>North and South</td>
<td>CCT</td>
<td>$49</td>
<td></td>
</tr>
<tr>
<td>2040 CC069</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (SR 15)</td>
<td>North to North and South to South</td>
<td>I-15, SR 94</td>
<td>$274</td>
<td></td>
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<tr>
<td>2040 CC070</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (SR 15)</td>
<td>South to North and South to North</td>
<td>I-15, SR 94</td>
<td>$274</td>
<td></td>
</tr>
<tr>
<td>2040 CC084</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (SR 94)</td>
<td>North to West and East to South</td>
<td>I-15, SR 94</td>
<td>$140</td>
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<tr>
<td>2040 CC087</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (SR 163)</td>
<td>North to North and South to South</td>
<td>N/A</td>
<td>$267</td>
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<tr>
<td>2040 CC090</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (I-8)</td>
<td>North to East and West to South</td>
<td>I-8, I-15</td>
<td>$202</td>
<td></td>
</tr>
<tr>
<td>2040 CC092</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (I-8)</td>
<td>South to East and West to North</td>
<td>I-8, I-15</td>
<td>$202</td>
<td></td>
</tr>
<tr>
<td>2040 TL02</td>
<td>Transit Leap</td>
<td>Commuter Rail 582</td>
<td>Sorrento Mesa to National City via UTC, Kearny Mesa, and University Heights</td>
<td>I-8, I-15, SR 94, CCT</td>
<td>$12,660</td>
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</tr>
</tbody>
</table>

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The SB2S Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of the Purple Commuter Rail alignment (Route 582). The analysis is studying an alignment that would include stations in City Heights and at SDSU (west campus).
<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020) Millions</th>
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<tbody>
<tr>
<td>2040</td>
<td>TL34</td>
<td>Transit Leap</td>
<td>Rapid 293</td>
<td>Imperial Beach to Otay Ranch via Palomar Street</td>
<td>SR 125</td>
<td>$111</td>
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<tr>
<td>2040</td>
<td>TL45</td>
<td>Transit Leap</td>
<td>Rapid 635</td>
<td>Eastlake to Palomar Trolley via Main Street Corridor</td>
<td>SR 125</td>
<td>$116</td>
</tr>
<tr>
<td>2040</td>
<td>TL47</td>
<td>Transit Leap</td>
<td>Rapid 638</td>
<td>Iris Trolley to Otay Mesa via Otay, Airway Drive, SR 905 Corridor</td>
<td>SR 125</td>
<td>$91</td>
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<tr>
<td>2050</td>
<td>CC016</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-805 (SR 905 to Palm Avenue)</td>
<td>8F to 6F+4ML</td>
<td>N/A</td>
<td>$60</td>
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<tr>
<td>2050</td>
<td>CC040</td>
<td>Complete Corridor: ML</td>
<td>SR 54 (I-805 to SR 125)</td>
<td>6F to 4F+2ML</td>
<td>SR 125</td>
<td>$48</td>
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<tr>
<td>2050</td>
<td>CC041</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>SR 905 (I-5 to Border)</td>
<td>6F to 4F+2ML</td>
<td>SR 125</td>
<td>$193</td>
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<tr>
<td>2050</td>
<td>CC071</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (SR 905)</td>
<td>South to East and West to North</td>
<td>N/A</td>
<td>$202</td>
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<tr>
<td>2050</td>
<td>CC086</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (SR 52)</td>
<td>North to West and East to South</td>
<td>CCT</td>
<td>$126</td>
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<tr>
<td>2050</td>
<td>CC089</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (I-8)</td>
<td>North to West and East to South</td>
<td>I-8, I-15</td>
<td>$202</td>
</tr>
<tr>
<td>2050</td>
<td>CC091</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (I-8)</td>
<td>South to West and East to North</td>
<td>I-8, I-15</td>
<td>$202</td>
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<tr>
<td>2050</td>
<td>CC093</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (SR 54)</td>
<td>South to East and West to North</td>
<td>N/A</td>
<td>$219</td>
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<tr>
<td>2050</td>
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<td>I-805 (SR 54)</td>
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<td>N/A</td>
<td>$219</td>
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<tr>
<td>2050</td>
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<td>Complete Corridor: MLC</td>
<td>I-805 (SR 905)</td>
<td>South to West and East to North</td>
<td>N/A</td>
<td>$202</td>
</tr>
<tr>
<td>2050</td>
<td>CC096</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (SR 905)</td>
<td>South to East and West to North</td>
<td>N/A</td>
<td>$202</td>
</tr>
<tr>
<td>2050</td>
<td>CCT15</td>
<td>Complete Corridor: Direct Access Ramp (DAR)</td>
<td>SR 905 (Beyer Boulevard)</td>
<td>East</td>
<td>N/A</td>
<td>$42</td>
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<tr>
<td>2050</td>
<td>CCT16</td>
<td>Complete Corridor: DAR</td>
<td>SR 905 (Siempre Viva Road)</td>
<td>North</td>
<td>SR 125</td>
<td>$42</td>
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<tr>
<td>2050</td>
<td>GM04</td>
<td>Goods Movement: Border</td>
<td>Otay Mesa POE Truck Bridge to CVEF</td>
<td>Otay Mesa POE: Bridge between POE and CVEF to coincide with improvements at both facilities</td>
<td>N/A</td>
<td>$50</td>
</tr>
</tbody>
</table>
# Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020 Millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2050</td>
<td>GM05</td>
<td>Goods Movement: Roadways</td>
<td>Harbor Drive Multimodal Corridor Improvements</td>
<td>Harbor Drive Multimodal Corridor Improvements, including but not limited to: ITS systems expanding the Designated Freight Route, removing height and weight conflicts along the truck route, improvements at 28th Street and 32nd Street, pedestrian crossings and bridges, various truck improvements, bikeway accommodations, streetscape, safety, and parking improvements</td>
<td>CMH</td>
<td>$192</td>
</tr>
<tr>
<td>2050</td>
<td>TL03</td>
<td>Transit Leap</td>
<td>Commuter Rail S82</td>
<td>National City to U.S. Border</td>
<td>I-15, SR 94</td>
<td>$2,977</td>
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<tr>
<td>2050</td>
<td>TL04</td>
<td>Transit Leap</td>
<td>Commuter Rail S83</td>
<td>Central Mobility Hub to U.S. Border via Downtown San Diego</td>
<td>I-8, I-15, SR 94, CMH</td>
<td>$7,581</td>
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<tr>
<td>2050</td>
<td>TL13</td>
<td>Transit Leap</td>
<td>LRT S10</td>
<td>Blue Line (San Ysidro to UTC, grade separations at Taylor/Ash)</td>
<td>I-8, I-15, SR 94, CCT, CMH</td>
<td>$510</td>
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<tr>
<td><strong>Central Mobility Hub (CMH)</strong></td>
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<tr>
<td>2029</td>
<td>CC003</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (Pacific Highway to SR 52)</td>
<td>8F to 6F+4ML</td>
<td>I-8, CCT</td>
<td>$353</td>
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<td>2029</td>
<td>TL23</td>
<td>Transit Leap</td>
<td>Rapid 28</td>
<td>Point Loma to Kearny Mesa via Central Mobility Hub, Linda Vista</td>
<td>I-8, I-15, CCT, SB2S</td>
<td>$105</td>
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<tr>
<td>2029</td>
<td>TL52</td>
<td>Transit Leap</td>
<td>Rapid 910</td>
<td>Coronado to Downtown via Coronado Bridge</td>
<td>I-8, I-15, SR 94, SB2S</td>
<td>$51</td>
</tr>
<tr>
<td>2029</td>
<td>TL56</td>
<td>Transit Leap</td>
<td>Airport Connection Automated People Mover</td>
<td>Central Mobility Hub to Airport via Car Rental Lot and Harbor Island East Basin</td>
<td>I-8</td>
<td>$1,398</td>
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<tr>
<td>2040</td>
<td>CCT17</td>
<td>Complete Corridor: AIRC</td>
<td>Complete Corridor Elements</td>
<td>Airport connectivity including Laurel Street airport entrance, Laurel Street modifications (Pacific Highway to I-15), and new I-5 freeway ramps at Laurel Street and Redwood</td>
<td>N/A</td>
<td>$836</td>
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<tr>
<td>2040</td>
<td>MHLA1</td>
<td>Mobility Hubs</td>
<td>Central Mobility Hub</td>
<td>Transit station construction and site acquisition</td>
<td>N/A</td>
<td>$2,420</td>
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<tr>
<td>2040</td>
<td>TL18</td>
<td>Transit Leap</td>
<td>Tram S55</td>
<td>Tram: Downtown to Logan Heights, Golden Hill, South Park, North Park, University Heights, Hillcrest</td>
<td>I-8, I-15, SB2S</td>
<td>$1,175</td>
</tr>
</tbody>
</table>

10 The SB2S Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of the Purple Commuter Rail alignment (Route S82). The analysis is studying an alignment that would include stations in City Heights and at SDSU (west campus).

11 SANDAG will conduct a Blue Line Express Feasibility and Conceptual Engineering Study as a Near-Term Implementation Action (included in Appendix B: Implementation Actions).
### Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost (2020) Millions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>State Route 125 (SR 125)</strong></td>
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<tr>
<td>2029</td>
<td>CCO42</td>
<td>Complete Corridor: ML</td>
<td>SR 125 (SR 54 to Amaya Drive)</td>
<td>6F/8F to 4F/6F+2ML</td>
<td>I-8, SR 94</td>
<td>$59</td>
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<tr>
<td>2029</td>
<td>CCT12</td>
<td>Complete Corridor: DAR</td>
<td>SR 125 (Spring Street/SR 94)</td>
<td>South</td>
<td>I-8, SR 94</td>
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<td>2029</td>
<td>TL33</td>
<td>Transit Leap</td>
<td>Rapid 292 Phase 2</td>
<td>Pacific Beach to Otay Mesa via Kearny Mesa, El Cajon, Jamacha, and Otay Lakes (full version of Rapid)</td>
<td>I-8, I-15, SR 94, CCT, SB2S</td>
<td>$96</td>
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<tr>
<td>2040</td>
<td>CCO97</td>
<td>Complete Corridor: MLC</td>
<td>SR 125 (I-8)</td>
<td>North to West and East to South</td>
<td>I-8, SR 94</td>
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<tr>
<td>2040</td>
<td>CCO98</td>
<td>Complete Corridor: MLC</td>
<td>SR 125 (I-8)</td>
<td>North to East and West to South</td>
<td>I-8, SR 94</td>
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<td>2040</td>
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<td>North to West and East to South</td>
<td>SR 94</td>
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<td>2050</td>
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<td>Complete Corridor: ML</td>
<td>SR 125 (Amaya Drive to Mission Gorge Road)</td>
<td>6F to 4F+2ML</td>
<td>I-8, CCT</td>
<td>$40</td>
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<td>2050</td>
<td>CCO44</td>
<td>Complete Corridor: ML</td>
<td>SR 125 (SR 905 to SR 54)</td>
<td>4T to 4F+2ML</td>
<td>SB2S</td>
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<tr>
<td>2050</td>
<td>CCT100</td>
<td>Complete Corridor: MLC</td>
<td>SR 125 (SR 52)</td>
<td>North to West and East to South</td>
<td>CCT</td>
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<tr>
<td>2050</td>
<td>CCT101</td>
<td>Complete Corridor: MLC</td>
<td>SR 125 (SR 54)</td>
<td>South to South and North to North</td>
<td>N/A</td>
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<tr>
<td>2050</td>
<td>CCT102</td>
<td>Complete Corridor: MLC</td>
<td>SR 125 (SR 54)</td>
<td>North to West and East to South</td>
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<tr>
<td>2050</td>
<td>CCT113</td>
<td>Complete Corridor: DAR</td>
<td>SR 125 (Jamacha Boulevard)</td>
<td>North and South</td>
<td>N/A</td>
<td>$49</td>
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<tr>
<td><strong>Interstate-15 (I-15)</strong></td>
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<tr>
<td>2029</td>
<td>CCO73</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (SR 78)</td>
<td>East to South and North to West</td>
<td>North County Corridor</td>
<td>$147</td>
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<tr>
<td>2032</td>
<td>TL31</td>
<td>Transit Leap</td>
<td>Rapid 238</td>
<td>UC San Diego to Rancho Bernardo via Sorrento Valley and Carroll Canyon</td>
<td>SR 56, CCT, SB2S</td>
<td>$78</td>
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<tr>
<td>2040</td>
<td>CCO11</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-15 (I-5 to I-805)</td>
<td>6F to 6F+2ML</td>
<td>SR 94, SB2S</td>
<td>$103</td>
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<tr>
<td>2040</td>
<td>CCO12</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-15 (I-805 to I-8)</td>
<td>8F+2TL to 6F+2TL+2ML</td>
<td>I-8, SR 94, SB2S</td>
<td>$115</td>
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<tr>
<td>2040</td>
<td>CCO13</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-15 (I-8 to SR 163)</td>
<td>8F to 6F+4ML</td>
<td>I-8, CCT, SB2S</td>
<td>$241</td>
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</table>
## Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020) Millions</th>
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<tbody>
<tr>
<td>2040</td>
<td>CC074</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (SR 52)</td>
<td>West to North and South to East</td>
<td>CCT, SB2S</td>
<td>$181</td>
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<tr>
<td>2040</td>
<td>CC075</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (SR 52)</td>
<td>North to West and East to South</td>
<td>CCT, SB2S</td>
<td>$196</td>
</tr>
<tr>
<td>2040</td>
<td>CC076</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (SR 52)</td>
<td>North to East and West to South</td>
<td>CCT, SB2S</td>
<td>$196</td>
</tr>
<tr>
<td>2040</td>
<td>CC077</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (SR 52)</td>
<td>South to West and East to North</td>
<td>CCT, SB2S</td>
<td>$196</td>
</tr>
<tr>
<td>2040</td>
<td>CC079</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (I-8)</td>
<td>North to West and East to South</td>
<td>I-8, SB2S</td>
<td>$202</td>
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<tr>
<td>2040</td>
<td>CC080</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (I-8)</td>
<td>North to East and West to South</td>
<td>I-8, SB2S</td>
<td>$202</td>
</tr>
<tr>
<td>2040</td>
<td>CC081</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (I-8)</td>
<td>South to West and East to North</td>
<td>I-8, SB2S</td>
<td>$202</td>
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<tr>
<td>2040</td>
<td>CC082</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (I-8)</td>
<td>South to East and West to North</td>
<td>I-8, SB2S</td>
<td>$202</td>
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<tr>
<td>2040</td>
<td>CC083</td>
<td>Complete Corridor: MLC</td>
<td>I-805 (SR 15)</td>
<td>North to North and South to South</td>
<td>SR 94, SB2S</td>
<td>$112</td>
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<tr>
<td>2040</td>
<td>CC110</td>
<td>Complete Corridor: DAR</td>
<td>I-15 (Clairemont Mesa Boulevard)</td>
<td>North and South</td>
<td>N/A</td>
<td>$49</td>
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<tr>
<td>2040</td>
<td>TL29</td>
<td>Transit Leap</td>
<td>Rapid 235</td>
<td>Escondido to Downtown San Diego via I-15 (DAR stations)</td>
<td>I-8, SR 56, SR 94, CCT, North County Corridor, SB2S</td>
<td>$34</td>
</tr>
<tr>
<td>2040</td>
<td>TL30</td>
<td>Transit Leap</td>
<td>Rapid 237</td>
<td>UC San Diego to Rancho Bernardo via Sorrento Valley and Mira Mesa</td>
<td>SR 56, CCT, SB2S</td>
<td>$54</td>
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<tr>
<td>2050</td>
<td>CC014</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-15 (Valley Parkway to SR 76)</td>
<td>8F to 6F+3ML</td>
<td>N/A</td>
<td>$408</td>
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<tr>
<td>2050</td>
<td>CC015</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-15 (SR 76 to County Line)</td>
<td>8F to 6F+3ML</td>
<td>North County Corridor</td>
<td>$199</td>
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<td>2050</td>
<td>CC072</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (SR 78)</td>
<td>South to West and East to North</td>
<td>North County Corridor</td>
<td>$147</td>
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<tr>
<td>2050</td>
<td>CC078</td>
<td>Complete Corridor: MLC</td>
<td>I-15 (SR 56)</td>
<td>South to West and East to North</td>
<td>SR 56</td>
<td>$239</td>
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</table>
## Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020 Millions)</th>
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</thead>
<tbody>
<tr>
<td><strong>Interstate 5 North Coast Corridor (I-5 NCC)</strong></td>
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<tr>
<td>2026</td>
<td>CC046</td>
<td>Complete Corridor: ML</td>
<td>I-5 (Manchester to Vandegrift)</td>
<td>8F to 8F+2HOV/high-occupancy toll (HOT) (^{12})</td>
<td>North County Corridor</td>
<td>$171</td>
</tr>
<tr>
<td>2026</td>
<td>TL05</td>
<td>Transit Leap/ Goods Movement</td>
<td>Commuter Rail 398</td>
<td>Oceanside to Downtown San Diego (includes upgrades to Pacific Surfliner/COASTER/Metrolink/Freight LOSSAN services from Orange County to Downtown San Diego, wooden bridge replacements, add station at Downtown San Diego)</td>
<td>CMH</td>
<td>$1,203</td>
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<tr>
<td>2029</td>
<td>TL40</td>
<td>Transit Leap</td>
<td>Rapid 473</td>
<td>Oceanside to Solana Beach to UTC/UC San Diego via Highway 101 Coastal Communities, Carmel Valley</td>
<td>SR 56, CCT, North County Corridor, SB2S</td>
<td>$156</td>
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<tr>
<td>2032</td>
<td>CC004</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (SR 52 to I-805)</td>
<td>8F to 6F+4ML</td>
<td>CCT, SB2S</td>
<td>$190</td>
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<tr>
<td>2032</td>
<td>CCl11</td>
<td>Complete Corridor: DAR</td>
<td>I-5 (Voigt)</td>
<td>North and South</td>
<td>N/A</td>
<td>$49</td>
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<tr>
<td>2040</td>
<td>CC007</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (Via de La Valle to La Costa)</td>
<td>8F to 6F+4ML</td>
<td>N/A</td>
<td>$316</td>
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<tr>
<td>2040</td>
<td>CC008</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (La Costa to Cassidy Street)</td>
<td>8F to 6F+4ML</td>
<td>North County Corridor</td>
<td>$302</td>
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<tr>
<td>2040</td>
<td>CC009</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (Cassidy Street to Harbor Drive)</td>
<td>8F to 6F+4ML</td>
<td>North County Corridor</td>
<td>$121</td>
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<tr>
<td>2040</td>
<td>CC010</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (Harbor Drive to County Line)</td>
<td>8F to 6F+2ML</td>
<td>N/A</td>
<td>$197</td>
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<tr>
<td>2040</td>
<td>TL06</td>
<td>Transit Leap/ Goods Movement</td>
<td>Commuter Rail 398</td>
<td>Oceanside to Downtown San Diego (build Del Mar tunnel, add stations at Central Mobility Hub and Camp Pendleton, and grade separation at Leucadia Boulevard)</td>
<td>North County Corridor</td>
<td>$2,875</td>
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<tr>
<td>2050</td>
<td>CC104</td>
<td>Complete Corridor: Interchange and Arterial Operational Improvements</td>
<td>I-5 (SR 56)</td>
<td>West to North and South to East</td>
<td>SR 56</td>
<td>$379</td>
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<td>2050</td>
<td>TL07</td>
<td>Transit Leap/ Goods Movement</td>
<td>Commuter Rail 398</td>
<td>Oceanside to Downtown San Diego (build Sorrento Mesa and UTC tunnels, add station at Balboa Avenue)</td>
<td>SR 56, CCT</td>
<td>$3,171</td>
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\(^{12}\) Project is consistent with the Caltrans North Coast Corridor (Build NCC) project.

*San Diego Forward: The 2021 Regional Plan*
## Major Projects by Corridor and Air Quality Phasing

### State Route 94 (SR 94)

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020 Millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2026</td>
<td>CC108</td>
<td>Complete Corridor: Interchange and Arterial Operational Improvements</td>
<td>SR 94 (SR 125)</td>
<td>South to East, including auxiliary lane to Lemon Avenue</td>
<td>I-8, SR 125</td>
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<tr>
<td>2040</td>
<td>CC032</td>
<td>Complete Corridor: ML</td>
<td>SR 94 (I-5 to I-15)</td>
<td>8F to 6F+3ML</td>
<td>I-15, SB2S</td>
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<tr>
<td>2040</td>
<td>CC033</td>
<td>Complete Corridor: ML</td>
<td>SR 94 (I-15 to I-805)</td>
<td>8F to 6F+3ML</td>
<td>I-15, SB2S</td>
<td>$23</td>
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<td>2040</td>
<td>CC034</td>
<td>Complete Corridor: ML</td>
<td>SR 94 (I-805 to SR 125)</td>
<td>8F to 6F+3ML</td>
<td>I-8, I-15, SR 125, SB2S</td>
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<td>2040</td>
<td>TL14</td>
<td>Transit Leap</td>
<td>LRT 520</td>
<td>Orange Line (El Cajon to Downtown, double/third-tracking and grade separations at Euclid Avenue, Broadway/Lemon Grove Avenue, Allison Avenue/University Avenue, and Severin Drive)</td>
<td>I-8, I-15, SR 125, CMH, SB2S</td>
<td>$274</td>
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<td>TL15</td>
<td>Transit Leap</td>
<td>LRT 520</td>
<td>Orange Line (El Cajon to Downtown, double/third-tracking)</td>
<td>I-8, I-15, SR 125, CCT, CMH</td>
<td>$274</td>
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### Interstate 8 (I-8)

<table>
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<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020 Millions)</th>
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<tbody>
<tr>
<td>2023</td>
<td>TL19</td>
<td>Transit Leap</td>
<td>Rapid 10 Phase 1</td>
<td>La Mesa to Ocean Beach via Mid-City, Hillcrest, Old Town (light version of Rapid)</td>
<td>I-15, SR 94, SR 125, CMH, SB2S</td>
<td>$36</td>
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<tr>
<td>2029</td>
<td>TL20</td>
<td>Transit Leap</td>
<td>Rapid 10 Phase 2</td>
<td>La Mesa to Ocean Beach via Mid-City, Hillcrest, Central Mobility Hub (full version of Rapid)</td>
<td>I-15, SR 94, SR 125, CMH, S2BS</td>
<td>$146</td>
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<tr>
<td>2040</td>
<td>CC024</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-8 (I-805 to College Avenue)</td>
<td>8F to 6F+4ML</td>
<td>I-15, SB2S</td>
<td>$161</td>
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<tr>
<td>2040</td>
<td>CC025</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-8 (College Avenue to Johnson Avenue)</td>
<td>8F to 6F+4ML</td>
<td>SR 94, SR 125</td>
<td>$281</td>
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<tr>
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<td>CC026</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-8 (Johnson Avenue to Mollison Avenue)</td>
<td>6F to 4F+4ML</td>
<td>SR 125, CCT</td>
<td>$48</td>
</tr>
<tr>
<td>2040</td>
<td>CC027</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-8 (Mollison Avenue to Greenfield Drive)</td>
<td>4F/6F to 4F+4ML</td>
<td>N/A</td>
<td>$106</td>
</tr>
<tr>
<td>2040</td>
<td>TL16</td>
<td>Transit Leap</td>
<td>LRT 530</td>
<td>Green Line (Santee to Downtown, double/third-tracking and grade separations)</td>
<td>I-15, SR 94, SR 125, CCT, CMH, SB2S</td>
<td>$384</td>
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<tr>
<td>2050</td>
<td>CC023</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-8 (I-5 to I-805)</td>
<td>8F to 6F+4ML</td>
<td>I-15, SB2S</td>
<td>$179</td>
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<tr>
<td>Conformity Analysis Year</td>
<td>Project ID</td>
<td>Category</td>
<td>Project Name</td>
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<td>Connecting Corridor(s)</td>
<td>Cost ($2020 Millions)</td>
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<tr>
<td>2050</td>
<td>CC067</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (I-8)</td>
<td>South to East and West to North</td>
<td>CMH</td>
<td>$202</td>
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<tr>
<td>2050</td>
<td>CC068</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (I-8)</td>
<td>North to East and West to South</td>
<td>CMH</td>
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<tr>
<td>2050</td>
<td>TL01</td>
<td>Transit Leap</td>
<td>Commuter Rail S81</td>
<td>581: Downtown to El Cajon via SDSU and La Mesa, S81B: Central Mobility Hub to El Cajon via SDSU and La Mesa</td>
<td>I-15, SR 94, SR 125, CMH, SB2S</td>
<td>$9,774</td>
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<tr>
<td>2050</td>
<td>TL17</td>
<td>Transit Leap</td>
<td>LRT S30</td>
<td>Green Line (Santee to Downtown, double/third-tracking and grade separations)</td>
<td>I-15, SR 94, SR 125, CCT, CMH, SB2S</td>
<td>$384</td>
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<tr>
<td>Coast, Canyons, and Trails (CCT)</td>
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<tr>
<td>2023</td>
<td>TL32</td>
<td>Transit Leap</td>
<td>Rapid 292 Phase 1</td>
<td>Pacific Beach to Kearny Mesa (light version of Rapid)</td>
<td>I-15, SB2S</td>
<td>$7</td>
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<tr>
<td>2029</td>
<td>TL24</td>
<td>Transit Leap</td>
<td>Rapid 30</td>
<td>Balboa Station to Sorrento Mesa via Pacific Beach, La Jolla, UTC</td>
<td>SB2S</td>
<td>$189</td>
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<tr>
<td>2029</td>
<td>TL50</td>
<td>Transit Leap</td>
<td>Rapid 870</td>
<td>El Cajon to UTC via Santee, SR 52, I-805</td>
<td>I-8, I-15, SR 125, SB2S</td>
<td>$62</td>
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<tr>
<td>2029</td>
<td>TL51</td>
<td>Transit Leap</td>
<td>Rapid 890</td>
<td>El Cajon to Sorrento Mesa via Santee, SR 52, I-805</td>
<td>I-5 NCC, I-8, I-15, SR 125, SB2S</td>
<td>$107</td>
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<tr>
<td>2032</td>
<td>CC029</td>
<td>Complete Corridor: ML</td>
<td>SR 52 (I-805 to I-15)</td>
<td>6F to 4F+3ML</td>
<td>I-15</td>
<td>$92</td>
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<tr>
<td>2032</td>
<td>CC030</td>
<td>Complete Corridor: ML</td>
<td>SR 52 (I-15 to Mast Boulevard)</td>
<td>6F to 4F+3ML</td>
<td>I-15</td>
<td>$153</td>
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<tr>
<td>2032</td>
<td>CC031</td>
<td>Complete Corridor: ML</td>
<td>SR 52 (Mast Boulevard to SR 125)</td>
<td>4F to 4F+3ML</td>
<td>N/A</td>
<td>$103</td>
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<tr>
<td>2050</td>
<td>CC028</td>
<td>Complete Corridor: ML</td>
<td>SR 52 (I-5 to I-805)</td>
<td>4F to 4F+3ML</td>
<td>SB2S</td>
<td>$214</td>
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<tr>
<td>2050</td>
<td>CC065</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (SR 52)</td>
<td>South to East and West to North</td>
<td>N/A</td>
<td>$202</td>
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<tr>
<td>2050</td>
<td>CC066</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (SR 52)</td>
<td>North to East and West to South</td>
<td>N/A</td>
<td>$202</td>
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</table>
## Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020 Millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>State Route 56 (SR 56)</strong></td>
<td></td>
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<tr>
<td>2040</td>
<td>CC006</td>
<td>Complete Corridor: ML/ Goods Movement</td>
<td>I-5 (SR 56 to Via de La Valle)</td>
<td>8F/10F+2HOV to 6F/8F+4ML</td>
<td>I-5 NCC</td>
<td>$37</td>
</tr>
<tr>
<td>2040</td>
<td>TL26</td>
<td>Transit Leap</td>
<td>Rapid 103</td>
<td>Solana Beach to Sabre Springs via Del Mar Heights and SR 56</td>
<td>I-15</td>
<td>$53</td>
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<tr>
<td>2040</td>
<td>TL27</td>
<td>Transit Leap</td>
<td>Rapid 104</td>
<td>Sorrento Valley to Sabre Springs via SR 56</td>
<td>I-15, SB2S</td>
<td>$11</td>
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<tr>
<td>2050</td>
<td>CC035</td>
<td>Complete Corridor: ML</td>
<td>SR 56 (I-5 to I-15)</td>
<td>4F to 4F+3ML</td>
<td>I-15</td>
<td>$549</td>
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<tr>
<td><strong>San Vicente</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2040</td>
<td>CC050</td>
<td>Complete Corridor: Rural</td>
<td>SR 67 (Mapleview to Dye Road)</td>
<td>Shoulder widening/straightening</td>
<td>N/A</td>
<td>$206</td>
</tr>
<tr>
<td>2050</td>
<td>CC061</td>
<td>Complete Corridor: Rural</td>
<td>SR 78 (Deer Canyon Drive to Santa Ysabel)</td>
<td>Intersection improvements</td>
<td>N/A</td>
<td>$4</td>
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<tr>
<td><strong>North County Corridor</strong></td>
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<tr>
<td>2023</td>
<td>TL37</td>
<td>Transit Leap</td>
<td>Rapid 450 Phase 1</td>
<td>Oceanside to Escondido via Palomar Airport Road and SR 78 (light version of Rapid)</td>
<td>I-5 NCC, I-15</td>
<td>$8</td>
</tr>
<tr>
<td>2029</td>
<td>CC036</td>
<td>Complete Corridor: ML</td>
<td>SR 78 (I-5 to Twin Oaks)</td>
<td>6F to 4F+4ML+Connectors</td>
<td>N/A</td>
<td>$507</td>
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<tr>
<td>2029</td>
<td>CC037</td>
<td>Complete Corridor: ML</td>
<td>SR 78 (Twin Oaks to I-15)</td>
<td>6F to 4F+4ML</td>
<td>I-15</td>
<td>$145</td>
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<tr>
<td>2029</td>
<td>CC064</td>
<td>Complete Corridor: MLC</td>
<td>I-5 (SR 78)</td>
<td>South to East and West to North, North to East and West to South</td>
<td>N/A</td>
<td>$352</td>
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<tr>
<td>2029</td>
<td>TL36</td>
<td>Transit Leap</td>
<td>Rapid 440</td>
<td>Carlsbad to Escondido Transit Center via Palomar Airport Road</td>
<td>I-5 NCC, I-15</td>
<td>$71</td>
</tr>
<tr>
<td>2029</td>
<td>TL39</td>
<td>Transit Leap</td>
<td>Rapid 471</td>
<td>Downtown Escondido to East Escondido</td>
<td>I-15</td>
<td>$85</td>
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<tr>
<td>2029</td>
<td>TL41</td>
<td>Transit Leap</td>
<td>Rapid 474</td>
<td>Oceanside to Vista via Mission Avenue/Santa Fe Road Corridor</td>
<td>I-5 NCC</td>
<td>$71</td>
</tr>
<tr>
<td>2029</td>
<td>TL42</td>
<td>Transit Leap</td>
<td>Rapid 477</td>
<td>Carlsbad Village to SR 76 via College Boulevard, Plaza Camino Real</td>
<td>I-5 NCC</td>
<td>$108</td>
</tr>
<tr>
<td>2040</td>
<td>CC105</td>
<td>Complete Corridor: Interchange and Arterial Operational Improvements</td>
<td>I-5 (SR 78)</td>
<td>South to East and West to South</td>
<td>I-5 NCC</td>
<td>$379</td>
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## Major Projects by Corridor and Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Connecting Corridor(s)</th>
<th>Cost ($2020 Millions)</th>
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<tbody>
<tr>
<td>2040</td>
<td>TL10</td>
<td>Transit Leap</td>
<td>LRT 399</td>
<td>SPRINT (Oceanside to Escondido, double-tracking and grade separations at El Camino Real, Melrose Drive, Vista Village Drive/Main Street, North Drive, Civic Center, Auto Parkway, and Mission Avenue)</td>
<td>I-15</td>
<td>$376</td>
</tr>
<tr>
<td>2040</td>
<td>TL38</td>
<td>Transit Leap</td>
<td>Rapid 450 Phase 2</td>
<td>Oceanside to Escondido via Palomar Airport Road and SR 78 (full version of Rapid)</td>
<td>I-5 NCC, I-15</td>
<td>$31</td>
</tr>
<tr>
<td>2050</td>
<td>TL11</td>
<td>Transit Leap</td>
<td>LRT 399</td>
<td>SPRINT (Oceanside to Escondido, extension to North County Fair)</td>
<td>I-5 NCC, I-15</td>
<td>$376</td>
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## Table C.12: Rural Corridor Projects Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Description</th>
<th>Cost ($2020 Millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2040</td>
<td>CC047</td>
<td>Complete Corridor: Rural</td>
<td>I-8 (I-8 to West Willows Road)</td>
<td>Interchange improvements</td>
<td>$11</td>
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<tr>
<td>2040</td>
<td>CC049</td>
<td>Complete Corridor: Rural</td>
<td>SR 94 (SR 94 to Melody Road/Daisy Drive)</td>
<td>Intersection improvements</td>
<td>$8</td>
</tr>
<tr>
<td>2040</td>
<td>CC052</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (Rice Canyon Road to Pala Reservation)</td>
<td>Straightening</td>
<td>$60</td>
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<tr>
<td>2040</td>
<td>CC055</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (SR 76 to Cole Grade Road)</td>
<td>Intersection improvements</td>
<td>$1</td>
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<tr>
<td>2040</td>
<td>CC057</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (SR 76 to Pauma Reservation Road)</td>
<td>Intersection improvements</td>
<td>$1</td>
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<tr>
<td>2040</td>
<td>CC058</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (Pala Casino to Rice Canyon Road)</td>
<td>Facility improvements</td>
<td>$1</td>
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<tr>
<td>2040</td>
<td>CC060</td>
<td>Complete Corridor: Rural</td>
<td>SR 79 (SR 79 to Schoolhouse Canyon Road)</td>
<td>Intersection improvements</td>
<td>$1</td>
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<tr>
<td>2050</td>
<td>CC048</td>
<td>Complete Corridor: Rural</td>
<td>I-8 (I-8 to East Willows Road)</td>
<td>Interchange improvements</td>
<td>$11</td>
</tr>
<tr>
<td>2050</td>
<td>CC051</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (SR 79 to Valley Center Road)</td>
<td>Facility improvements</td>
<td>$693</td>
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<tr>
<td>2050</td>
<td>CC053</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (Harolds Road to Pauma Rancho)</td>
<td>Straightening</td>
<td>$21</td>
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<tr>
<td>2050</td>
<td>CC054</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (SR 76 to Pala Mission Road)</td>
<td>Intersection improvements</td>
<td>$1</td>
</tr>
<tr>
<td>2050</td>
<td>CC056</td>
<td>Complete Corridor: Rural</td>
<td>SR 76 (West Reservation Boundary to East Reservation Boundary)</td>
<td>Shoulder widening</td>
<td>$40</td>
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<tr>
<td>2050</td>
<td>CC059</td>
<td>Complete Corridor: Rural</td>
<td>SR 79 (Deer Canyon Road to San Felipe Road)</td>
<td>Shoulder widening</td>
<td>$226</td>
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<tr>
<td>2050</td>
<td>CC062</td>
<td>Complete Corridor: Rural</td>
<td>SR 94 (Jamul Reservation to Tecate Road)</td>
<td>Shoulder widening/straightening</td>
<td>$252</td>
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## Arterial Projects Air Quality Phasing

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<th>Conformity Year</th>
<th>TIP ID</th>
<th>Lead Agency</th>
<th>Project Name</th>
<th>Description</th>
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<tbody>
<tr>
<td>2023</td>
<td>CB04B</td>
<td>Carlsbad</td>
<td>El Camino Real and Cannon Road</td>
<td>In Carlsbad, along the east side of El Camino Real just south of Cannon Road, widen to prime arterial standards with three through lanes, a right turn lane, and a sidewalk approaching the intersection.</td>
</tr>
<tr>
<td>2023</td>
<td>CB32</td>
<td>Carlsbad</td>
<td>El Camino Real Widening – Poinsettia to Camino Vida Roble</td>
<td>In Carlsbad, widen El Camino Real from 900 feet north of Cassia Road to Camino Vida Roble, along the northbound side of the roadway to provide three travel lanes and a bike lane in accordance with prime arterial standards.</td>
</tr>
<tr>
<td>2023</td>
<td>CB59</td>
<td>Carlsbad</td>
<td>El Camino Real Widening – Sunny Creek to Jackspar</td>
<td>In Carlsbad, on El Camino Real from Sunny Creek to Jackspar, widen along the northbound side of the El Camino Real to provide three travel lanes (currently two lanes northbound), sidewalk, and a bike lane.</td>
</tr>
<tr>
<td>2023</td>
<td>ESC04</td>
<td>Escondido</td>
<td>Citracado Parkway II</td>
<td>West Valley to Harmony Grove, widen from two to four lanes with raised medians; construct bridge over Escondido Creek.</td>
</tr>
<tr>
<td>2023</td>
<td>ESC08</td>
<td>Escondido</td>
<td>Felicita Avenue/Juniper Street</td>
<td>Widen from two to four lanes with left turn pockets, raised medians on Felicita; new traffic signals at Juniper and Chestnut, Juniper and 13th Avenue, Juniper and 15th Avenue; modify traffic signal at Juniper and Felicita.</td>
</tr>
<tr>
<td>2023</td>
<td>O22</td>
<td>Oceanside</td>
<td>College Boulevard Improvements from Avenida de la Plata to Waring Road</td>
<td>In Oceanside, widen from the existing four lanes to six lanes with bike lanes and raised median.</td>
</tr>
<tr>
<td>2023</td>
<td>SD70</td>
<td>San Diego</td>
<td>West Mission Bay Drive Bridge</td>
<td>In San Diego, replace bridge and increase from four- to six-lane bridge including Class II bike lane (52-643/S00871).</td>
</tr>
<tr>
<td>2023</td>
<td>SM19</td>
<td>San Marcos</td>
<td>Grand Avenue Bridge and Street Improvements</td>
<td>From Discovery Street to San Marcos Boulevard, construct four-lane arterial bridge and a six-lane arterial street from Craven to Grand Avenue.</td>
</tr>
<tr>
<td>2023</td>
<td>SM31</td>
<td>San Marcos</td>
<td>San Marcos Creek Specific Plan – Discovery Street Widening and Flood Control Improvements #88265</td>
<td>From Via Vera Cruz to Bent Avenue/Craven Road, widen roadway to four-lane secondary arterial.</td>
</tr>
<tr>
<td>2023</td>
<td>SM32</td>
<td>San Marcos</td>
<td>Via Vera Cruz Bridge and Street Improvements #88264</td>
<td>From San Marcos Boulevard to Discovery Street, widen to four-lane secondary arterial and construct a bridge at San Marcos Creek.</td>
</tr>
<tr>
<td>2023</td>
<td>SM42</td>
<td>San Marcos</td>
<td>Discovery Street from Craven to Twin Oaks #ST007</td>
<td>In the City of San Marcos, on Discovery Street from Craven Road to west of Twin Oaks Valley Road, construct approximately 5,100 lineal feet of a new six-lane roadway.</td>
</tr>
<tr>
<td>2023</td>
<td>SM48</td>
<td>San Marcos</td>
<td>San Marcos Creek Specific Plan: Creekside Drive and Pad Grading #88505</td>
<td>Construct approximately 3,000 feet of a two-lane collector road from Via Vera Cruz to Grand Avenue in the City of San Marcos. The road will include two 12-foot lanes, diagonal parking on the north side, and parallel parking on the south side. In addition, the project also will include a 10-foot bike trail meandering along the south side.</td>
</tr>
<tr>
<td>2023</td>
<td>SM69</td>
<td>San Marcos</td>
<td>Twin Oaks Valley Road &amp; Barham Drive Improvements #ST008</td>
<td>This project involves surface improvements including asphalt, concrete, medians, sidewalks, signage, and traffic lights. Underground improvements include utility and drainage improvements, relocations and water treatment within the public right of way to accommodate the construction of additional lanes.</td>
</tr>
<tr>
<td>Conformity Analysis Year</td>
<td>TIP ID</td>
<td>Lead Agency</td>
<td>Project Name</td>
<td>Description</td>
</tr>
<tr>
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<tr>
<td>2026</td>
<td>CB22</td>
<td>Carlsbad</td>
<td>Avenida Encinas – Widen from Palomar Airport Road to Embarcadero Lane</td>
<td>In Carlsbad, Avenida Encinas from Palomar Airport Road southerly to existing improvements adjacent to Embarcadero Lane, roadway widening to secondary arterial standards.</td>
</tr>
<tr>
<td>2026</td>
<td>CB31</td>
<td>Carlsbad</td>
<td>El Camino Real Widening – La Costa Avenue to Arenal Road</td>
<td>In Carlsbad, along El Camino Real from 700 feet north of La Costa Avenue to Arenal Road, widening along the southbound side of the roadway to provide three travel lanes and a bike lane in accordance with prime arterial standards.</td>
</tr>
<tr>
<td>2026</td>
<td>CHV69</td>
<td>Chula Vista</td>
<td>Heritage Road Bridge</td>
<td>Heritage Road from Main Street/Nirvana Avenue to Entertainment Circle, widen and lengthen bridge over Otay River from a four-lane to a six-lane bridge that accommodates shoulders, sidewalk, and median; project is on Heritage Road from the intersection of Main Street and Nirvana Avenue to Entertainment Circle.</td>
</tr>
<tr>
<td>2026</td>
<td>CHV87</td>
<td>Chula Vista</td>
<td>E Street Extension from Bay Boulevard to H Street</td>
<td>Extension of E Street and F Street west of Bay Boulevard, and the realignment of Gun Powder Point Drive for Chula Vista Bayfront redevelopment. Project includes construction of a roundabout at E Street, F Street, and Gunpowder Point Drive; Class I and II bike paths; and sidewalks.</td>
</tr>
<tr>
<td>2026</td>
<td>CNTY14A</td>
<td>San Diego County</td>
<td>South Santa Fe Avenue South</td>
<td>South Santa Fe from 700 feet south of Woodland Drive to Smilax Road, widening of South Santa Fe Avenue to a five-lane major road with a center left turn lane, curb, gutter, sidewalk, bike lanes, and drainage improvements from 700 feet south of Woodland Drive to Smilax Road.</td>
</tr>
<tr>
<td>2026</td>
<td>CNTY21</td>
<td>San Diego County</td>
<td>Bradley Avenue Widening and Overpass at SR 67</td>
<td>Widen Bradley Avenue from Magnolia Avenue to Mollison Avenue; widen from two lanes to four lanes plus sidewalks. Replace two-lane bridge over SR 67 with a six-lane bridge which accommodates turn pockets.</td>
</tr>
<tr>
<td>2026</td>
<td>CNTY34</td>
<td>San Diego County</td>
<td>Dye Road Extension</td>
<td>Dye Road to San Vicente Road – in Ramona, study, design, and construct a two-lane community collector road with intermittent turn lanes, bike lanes, curb, gutter, and pathway/walkway.</td>
</tr>
<tr>
<td>2026</td>
<td>CNTY98</td>
<td>San Diego County</td>
<td>Otay Lakes Road</td>
<td>Four-lane boulevard with raised median from the city/county boundary to Strada Piazza, and two-lane community collector with intermittent turn lanes to the east.</td>
</tr>
<tr>
<td>2026</td>
<td>ESC24</td>
<td>Escondido</td>
<td>Centre City Parkway</td>
<td>Mission Road to SR 78, widen four lanes to six lanes with intersection improvements.</td>
</tr>
<tr>
<td>2026</td>
<td>NC01</td>
<td>National City</td>
<td>Plaza Boulevard Widening</td>
<td>Phase II of Plaza Boulevard from Highland Avenue to N Avenue, widen from two to three lanes, including a new traffic lane in each direction, new sidewalks, sidewalk widening, traffic signal upgrades, and interconnection at Plaza Boulevard.</td>
</tr>
<tr>
<td>2026</td>
<td>NC01</td>
<td>National City</td>
<td>Plaza Boulevard Widening</td>
<td>Phase III of Plaza Boulevard from I-80 to Euclid Avenue, widen from two to three lanes, including a new traffic lane in each direction, new sidewalks, sidewalk widening, traffic signal upgrades, and interconnection at Plaza Boulevard.</td>
</tr>
<tr>
<td>2026</td>
<td>SD102A</td>
<td>San Diego</td>
<td>Otay Truck Route Widening (Phase 4)</td>
<td>Phase II (from Britannia to La Media Road) of Otay Truck Route in San Diego from Drucker Lane to La Media, add one lane (total three lanes) for trucks; from Britannia to La Media, add one lane for trucks and one lane for emergency vehicles (border patrol/fire department access); add one lane for trucks along Britannia from Britannia Court to the Otay Truck Route.</td>
</tr>
<tr>
<td>Conformity Analysis Year</td>
<td>TIP ID</td>
<td>Lead Agency</td>
<td>Project Name</td>
<td>Description</td>
</tr>
<tr>
<td>-------------------------</td>
<td>--------</td>
<td>-------------</td>
<td>--------------</td>
<td>-------------</td>
</tr>
<tr>
<td>2026</td>
<td>SD190</td>
<td>San Diego</td>
<td>Palm Avenue/I-805 Interchange</td>
<td>Improvements to the Palm Avenue Bridge over I-805, including repairs to the bridge approaches; a new Project Study Report and Preliminary Environmental Assessment Report. Phase II of the project will include widening of the bridge, realignment of existing ramps, possible addition of northbound looping entrance ramp, restriping of traffic lanes, and signal modifications.</td>
</tr>
<tr>
<td>2026</td>
<td>SD250</td>
<td>San Diego</td>
<td>La Media Road Improvements</td>
<td>In San Diego, on La Media Road from SR 905 to Siempre Viva Road, widen La Media Road to a six-lane primary arterial from SR 905 to Airway Road, and to a five-lane major road between Airway Road and Siempre Viva Road with three southbound lanes and two northbound lanes. This project will also improve drainage at the intersection of La Media Road and Airway Road (S-15018).</td>
</tr>
<tr>
<td>2026</td>
<td>SD34</td>
<td>San Diego</td>
<td>El Camino Real</td>
<td>In San Diego on El Camino Real from San Dieguito Road to Via de la Valle, reconstruct and widen from two to four lanes and extend transition lane and additional grading to avoid biological impacts (CIP 52-479.0).</td>
</tr>
<tr>
<td>2026</td>
<td>SM24</td>
<td>San Marcos</td>
<td>Woodland Parkway Interchange and Barham Drive Widening &amp; Street Improvements #88005</td>
<td>From La Moree Road to Rancheros Drive, modify existing ramps at Woodland Parkway and Barham Drive; widen and realign SR 78 undercrossing and associated work.</td>
</tr>
<tr>
<td>2029</td>
<td>CB12</td>
<td>Carlsbad</td>
<td>College Boulevard Reach A</td>
<td>In Carlsbad, from Badger Lane to Cannon Road, construct a new segment of College Boulevard to provide a four-lane roadway with raised median, bike lanes, and sidewalks/trails in accordance with major arterial standards.</td>
</tr>
<tr>
<td>2029</td>
<td>CNTY35</td>
<td>San Diego County</td>
<td>Ramona Street Extension</td>
<td>From Boundary Avenue to Warnock Drive – in the community of Ramona, construct new road extension, two lanes with intermittent turn lanes, bike lanes, and walkway/pathway.</td>
</tr>
<tr>
<td>2032</td>
<td>SD190</td>
<td>San Diego</td>
<td>Palm Avenue/I-805 Interchange</td>
<td>Improvements to the Palm Avenue Bridge over I-805, including repairs to the bridge approaches; a new Project Study Report and Preliminary Environmental Assessment Report. Phase III will provide the ultimate build-out of the project which will incorporate improvements of Phase II plus the northbound and southbound entrance ramps (CIP 52-640.0).</td>
</tr>
<tr>
<td>2032</td>
<td>SM10</td>
<td>San Marcos</td>
<td>SR 78/Smilax Interchange Improvements</td>
<td>Construct new interchange at Smilax Road interchange and SR 78 improvements.</td>
</tr>
</tbody>
</table>
## Table C.14: Other Transit Projects Air Quality Phasing

<table>
<thead>
<tr>
<th>Conformity Analysis Year</th>
<th>Project ID</th>
<th>Category</th>
<th>Project Name</th>
<th>Cost ($2020) Millions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2026 --</td>
<td>--</td>
<td>Transit Leap</td>
<td>Systemwide Operations Costs</td>
<td>$2,172</td>
</tr>
<tr>
<td>2026 TL60</td>
<td>Transit Leap</td>
<td>Vehicle Purchases and Replacements (including spares)</td>
<td>$395</td>
<td></td>
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<tr>
<td>2026 TL63</td>
<td>Transit Leap</td>
<td>Local Bus Route Enhanced Frequencies – Ten minutes in key corridors</td>
<td>Included with operations costs</td>
<td></td>
</tr>
<tr>
<td>2040 --</td>
<td>--</td>
<td>Transit Leap</td>
<td>Systemwide Operations Costs</td>
<td>$5,433</td>
</tr>
<tr>
<td>2040 TL61</td>
<td>Transit Leap</td>
<td>Vehicle Purchases and Replacements (including spares)</td>
<td>$1,033</td>
<td></td>
</tr>
<tr>
<td>2040 TL64</td>
<td>Transit Leap</td>
<td>Local Bus Route Enhanced Frequencies – Ten minutes in key corridors</td>
<td>Included with operations costs</td>
<td></td>
</tr>
<tr>
<td>2040 TL66</td>
<td>Transit Leap</td>
<td>Transit Fare Subsidies</td>
<td>$982</td>
<td></td>
</tr>
<tr>
<td>2050 --</td>
<td>--</td>
<td>Transit Leap</td>
<td>Systemwide Operations Costs</td>
<td>$12,021</td>
</tr>
<tr>
<td>2050 TL62</td>
<td>Transit Leap</td>
<td>Vehicle Purchases and Replacements (including spares)</td>
<td>$2,196</td>
<td></td>
</tr>
<tr>
<td>2050 TL65</td>
<td>Transit Leap</td>
<td>Local Bus Route Enhanced Frequencies – Ten minutes in key corridors</td>
<td>Included with operations costs</td>
<td></td>
</tr>
<tr>
<td>2050 TL67</td>
<td>Transit Leap</td>
<td>Transit Fare Subsidies</td>
<td>$4,041</td>
<td></td>
</tr>
</tbody>
</table>
Public Comments and Responses Received August 7 to November 24, 2021

San Diego Forward: The Draft 2021 Regional Plan (2021 Regional Plan) was released for public review and comment on May 28, 2021. The public comment period concluded on August 6, 2021. On October 29, 2021, SANDAG provided a copy of the comments received during the public comment period; those comments and responses can be found in Appendix G, Attachment 7 of the final 2021 Regional Plan.

SANDAG continued to accept, record, and respond to comments received via email, voicemail, public meetings, and letters (via email and mail). Between August 7, 2021, and November 24, 2021, SANDAG received 143 public comments.

Comments and corresponding responses are sorted first by source, then by commentor name, if provided, in alphabetical order.

Table 1: Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

<table>
<thead>
<tr>
<th>ID</th>
<th>Commentor Name</th>
<th>Agency</th>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>E293</td>
<td>Andrew M. Leeper</td>
<td></td>
<td>It has come to my attention that the present development plans for the immediate Santee Trolley Station Area may be lacking in crucial foresight that could ultimately weaken the futuristic developmental potential of the Santee/Lakeside area! At stake is the FULL developmental potential of the San Diego River Corridor, which would increase its overall attractiveness, and, ultimately, overall economic value! Extending the San Diego Trolley further along this riverbed property, along with smart development (including affordable housing) along its edges would do just that! And of course, with the control and capture of its river into nice bodies of water, and the addition of attractive pathways to walk (walk) along (kind of like that of Mission Valley), a real asset to this region would be realized!!! (I have also added a PDF Map with this message) Unfortunately, the immediate development around the Current End Santee Trolley Station threatens to “box in” its ability to facilitate this futuristic transformation! Without the Trolley being able to extend itself to the riverbed’s edges, I’m afraid none of these most desirable effects can take place. With this in mind, I must advocate that an open corridor be zoned in immediately so that NO NEW IMMEDIATE DEVELOPMENT can jeopardize this overall developmental reality!! Thank you for taking out your time for the consideration of this most desirable idea!!!</td>
<td>Land use authority is reserved to local jurisdictions - the cities and the county. Santee Trolley Station is in the jurisdiction of the City of Santee and subject to the city’s zoning and ordinances. Through the land use and housing programs identified in the 2021 Regional Plan, SANDAG will continue to work with local jurisdictions on planning efforts and development opportunities near transit.</td>
</tr>
<tr>
<td>E294</td>
<td>Anonymous</td>
<td></td>
<td>Why do we still have no transportation plan for people to be taken to and picked up from our international Airport ? Yet they have put way to much money into Palomar Airport ? We know when the planes are going to and from San Diego , I guess some people know someone in both counties?</td>
<td>The Regional Plan includes creation of a new Central Mobility Hub that will have fast, frequent, and convenient connections between existing and planned transit and the airport. The MTS Route 992 bus will continue to serve the airport from Downtown San Diego. Appendix A includes a grouped collection of priority airport roadways. These improvements include: Converting Laurel Street to Primary Airport Entrance/Exit Roadway, Modifying Laurel Street between Pac Highway and I-5, and installing new I-5 Freeway Ramps at Laurel and Redwood St.</td>
</tr>
<tr>
<td>E295</td>
<td>Anonymous</td>
<td></td>
<td>I oppose this Tax, it is unfair and does not consider the needs of the general population and San Dag has not followed the will of the voters.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.</td>
</tr>
<tr>
<td>ID</td>
<td>Commentor Name</td>
<td>Agency</td>
<td>Comment</td>
<td>Response</td>
</tr>
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<td>-----</td>
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<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>E296</td>
<td>Barbara Franklin</td>
<td></td>
<td>Your plan isn’t something San Diegans need or want. Also it’s antiquated technology. By the time it’s built much better options will be available. I didn’t vote to raise taxes to pay for this.</td>
<td>We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
</tr>
<tr>
<td>E297</td>
<td>Billie Collins</td>
<td></td>
<td>I have lived in California for well over 60 years, my family is here, and we love our state. However, all the taxation of EVERYTHING here is encouraging us to look elsewhere. Our children cannot afford to live here anymore, everyday there is a new “improvement” plan which requires new “funding”, meaning taxing. Plans are never completed, and money is wasted on unrealistic and unrealized dreams. We definitely oppose the proposed new mileage tax by SANDAG.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.</td>
</tr>
</tbody>
</table>

The 2021 San Diego Regional Plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies. Appendix G of the 2021 Regional Plan includes the Public Involvement Plan and details the strategies used to consult with the public. Additional engagement will be conducted as elements of the plan move forward to its implementation phases. In addition to more traditional fixed-route transit services, the 2021 Regional Plan incorporates Flexible Fleets, which will offer people a variety of on-demand shared vehicles. Flexible Fleet services may complement fixed-route services, even in more suburban communities. Flexible Fleets use demand-responsive technology to provide on-demand services, real-time arrival times, and optimize routing for the fastest route. With the Next Operating System (Next OS) proposed in the Regional Plan, real-time information from transit and Flexible Fleets will be integrated in the back-end. This data will be used to provide trip planning tools that provide accurate travel information and make planning, booking, and paying for a ride as seamless as possible.

Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

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E298 Billie English  
So you are going to charge a tax per mile even for those that cannot take public transportation. If we drive a van conversion that has a toilet when I have an IBS attack. Now you are going to tax me, just because you can. I'm one of many people that public transportation does not work for us. Besides you can't even keep our roads in reasonable condition. I will never be able to trust that any additional taxes will be used appropriately. You don't have a good track record. Just look at the streets in Mira Mesa. This is not nice. I would like a response to my email.

Response:
Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

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We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

The Plan includes Complete Streets improvements to address sidewalks and accessibility accommodation.

E299 Caleb Ng  
I oppose the mileage tax because we have already paid for our share in freeway infrastructure. Additionally, this tax would unfairly burden my family because there are no alternative methods of getting to and from my work which is about 23 miles from my house. We are already paying enough taxes. Enough is enough.

Response:
Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

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The Plan includes Complete Streets improvements to address sidewalks and accessibility accommodation.

E300 Carolyn Batiste  
Dear SANDAG Board, I am so disappointed that anyone would think that adding a tax to the mileage that we drive as a matter of our very existence is even a thought in anyone's idea of emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

Response:
Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

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We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

The Plan includes Complete Streets improvements to address sidewalks and accessibility accommodation.
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</tr>
</thead>
</table>
| E301 | Chad Ciampoli |         | representing the good folks of San Diego County. As your mission statement says: We are the regional agency that connects people, places, and innovative ideas by implementing solutions with our unique and diverse communities. Implementing this idea will create less congestion because you add cost to our very existence that will change the way we will navigate across this county. This will not create as your vision statement says: Pursuing a brighter future for all. You will be taxing generations to come with this burdensome tax. I grew up in the San Francisco-Oakland Bay Area. I know what good public transportation looks like. But the crime on BART is documented and it has lost riders. What you propose is not even close to responsible; and we all must pay for public transit when we use it. Making it fee means I don’t have an investment in the responsibility to care for the product. If you want to help people that are low income that is a good thing. You give people vouchers that they can apply for and we can verify need. We drive our children to school, daycare, medical and therapy appointments. If we manage to scrimp the money together we drive our kids to their games that cost of money for uniforms or participation to leagues. We drive our elderly parents, or neighbors to medical appointments and for shopping needs. We drive to maintain our livelihood to and from our place of employment and for some of us driving is integral to our employment. Shipping and delivery companies drive because it is the essence of their business. You tax that, they tax the consumer. No matter how you folks try to slice and dice what you say is fair, it will not be fair to any consumer in San Diego County. Your vision of Equity will not be achieved because even the lowest of income people all drive or have someone drive them in San Diego county. Your idea will create fees between family and friends just to offset the cost of driving. Just say no to any new taxes!!! We are all trying to recover from the economic pains of the COVID-19 shut down. Please stop the insanity of economic destruction with more new taxes. The TransNet measure approved by San Diego county voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. Some of the remaining projects in the TransNet measure are not likely to be constructed due to three primary factors: 1) changes in regional needs 2) changes in state law and 3) technology advancements that would suggest a different transportation solution. The changes in regional needs are the result of slower population growth than anticipated and a change in anticipated land use pattern from a sprawling pattern to a more focused development pattern with new growth occurring within existing urbanized areas. State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). Advancements in technology provide new solutions such as the use of shared electric vehicles and system improvements to signals and dynamic traffic signals that make better use of existing transportation infrastructure. The local elected officials of the SANDAG Board of Directors may review the TransNet ordinance and list of projects to discuss possible updates. This process is outside of the development the 2021 Regional Plan. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like,
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<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>E302</td>
<td>Charles Talcott</td>
<td></td>
<td>person? How can we trust your math or your promises when TransNet and TransNet 2 were either wrong or completely walked back on?</td>
<td>how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
</tr>
<tr>
<td>E303</td>
<td>Charles Talcott</td>
<td></td>
<td>STOP, the insanity of over taxation. The people of San Diego County, whom you say you serve, do not need nor want another tax. We also do not need politicians dreaming up grandiose schemes that will only hurt the majority and never benefit the majority. Reconsider your decision.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. The 2021 San Diego Regional Plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies.</td>
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San Diego Forward: The 2021 Regional Plan
Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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<td>E304</td>
<td>Chop Chaz</td>
<td>NO, NO, NO, AND NO</td>
<td>On your mileage tax</td>
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<td>E305</td>
<td>Christine Becker</td>
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<td>To whom it may concern, San Diegans are opposed to SANDAG’s proposed fee per mile driven plan. Here is the letter San Diegans will be sending, as well as some of the major concerns. I am a fourth generation San Diegan, and I cannot stand idly by, while they do this to my city. We are America’s finest City, let’s all stand together and prove it. The proposal suggests that all highways, in time, become toll roads. So basically, aside from car registration, cost of insurance, vehicle maintenance, your actual car payment, oh yeah, and gas, you will be taxed to oblivion for driving your car. Here are my personal thoughts, mingled with cold hard facts and the words of other concerned San Diegans. Commercial truckers will also be charged the additional cost to transport goods, that increase in fees will be passed along to the price of consumer goods. Groceries, Starbucks, Amazon packages. The price of literally everything will go up. What percentage of the automotive/automotive subsidiaries make up jobs in California, historically 3%, probably much higher now. How many car dealerships are there in San Diego, hundreds and hundreds, and how many does each dealership employ? Then there are Highway Patrolman, Jiffy Lube’s, discount tires, stereo installers, car painters, mechanics, wholesalers, window tinters’? Not to mention, the DMV, insurance companies. Trolleys are not policed, there will be an increase in crime. Rape, robbery, murder. Sorry, but I would never allow my 70-year-old mother to ride the trolley to get groceries or run an errand. Nor would I, myself. I’m a young, strong woman, and would still fear rape, robbery or even worse. In nice neighborhoods property value will go down because of the risk in the crime rate. This is a fact, research places where they have put trolley stations. There was just a post on next door about another recent attack.</td>
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We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

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<td>E306</td>
<td>Christine Springer</td>
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<td>I understand SANDAG is assessing the possibility of charging people per mile driving in California. If you ever want to drive anywhere from California this is going to be expensive. We drive a majority of our time down in Mexico because we have vacation property there and most of our driving is done down there. Are you going to charge us a California tax when we’re not even driving in the state of California? Why don’t you just charge a gas tax like you already do at an exorbitant rate? It’s so frustrating that they continue to raise taxes in California but yet never have enough money.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E307</td>
<td>Christine Wissing</td>
<td></td>
<td>Hello, I wanted to ask about how I can write against the new gas tax that San Diego is proposing. The reason that I would like to voice my concern is the fact that San Diego has become pretty much impossible to live with the cost of living rising. Also, I am a single mom that does not live near a trolley and getting my son to school and then to work in a timely manner would be a long vote on it. A response is requested.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<tr>
<td>E308</td>
<td>Denise Summer</td>
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<td>I would like my voice to be heard and wanted to say please do not instill a gas mileage tax in CA. It will cause a financial hardship on so many who are trying to make it in this beautiful state. We already have the highest gas tax in the country and a mileage tax would really create even more problems. Please find another solution. Thank you.</td>
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| E309 | Douglas and Christine Evans |  | We request the following:  
1) A NO VOTE on the SANDAG REGIONAL TRANSPORTATION IMPROVEMENT PLAN (RTIP) as currently proposed.  
2) UTILIZE the existing gasoline and diesel fuel tax as approved by the voters for its intended purpose — roads, bridges, etc. infrastructure. DO NOT SIPHON OFF OUR TAX DOLLARS FOR OTHER PROJECTS!  
3) COMPLETE past SANDAG projects — roads, bridges, etc. — that were approved, promised and never started / completed before embarking on other new projects.  
4) DO NOT IMPLEMENT a "tax-per mile plan" on internal combustion engine (ICE) vehicles | Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. |
without first eliminating all current federal, state, & local fuel taxes. A "tax-per-mile plan" could be
a replacement — one-for-one but, not an incremental or increased tax / fee.

5) DO IMPLEMENT a "tax-per-mile plan" on electrical vehicles (EVs) — full battery electric &
hybrid EVs; natural / propane gas vehicles; hydrogen vehicles. Those vehicles use the same roads
and infrastructure as other vehicles and need to pay their fair share for use of the infrastructure.

6) DO NOT IMPLEMENT MORE "MANAGED LANES" on San Diego County roads. All taxpayers
have the right to use all of the roads, bridges, etc. anytime of the day without paying more taxes /
fees to use what they have already paid for. DO NOT DISCRIMINATE! Plus, all lanes should be
available to all vehicles anytime of the day to minimize congestion on the roads.

7) SPEND SANDAG monies proportional to usage of infrastructure — a larger percentage for
roads, bridges, etc. and very small percentage for public transportation. Public transportation is
used by only 2.5% of the San Diego County population. Even if public transportation usage
increases to 10%, which is highly unlikely only a maximum spend of 10% of the total spend is
justified for public transportation.

8) DO NOT TRY TO FORCE PEOPLE OUT OF THEIR PERSONAL VEHICLES. Current vehicle
technology and future technology will reduce greenhouse gases from transportation and clean
up the environment.

Thank you for voting NO on the current RTIP and developing a plan that is suitable and beneficial
to all San Diego County residents — urban, rural, young, old, seniors, working folks, retirees, San
Diego proper, North County, East County, South County, etc. — not a plan that benefits just a few
residents at the detriment and cost to others.

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sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for
our transportation system.

The TransNet measure approved by San Diego county voters in 2004 focused on congestion
relief and included a set of transportation improvements, many of which have been completed.
The remaining projects in the TransNet measure are not likely to be constructed due to three
primary factors: 1) changes in regional needs 2) changes in state law and 3) technology
advancements that would suggest a different transportation solution. The changes in regional
needs are the result of slower population growth than anticipated and a change in anticipated
land use pattern from a sprawling pattern to a more focused development pattern with new
growth occurring within existing urbanized areas. State laws have changed from requiring
congestion relief (usually solved in the short term by widening roadways) to reducing vehicle
miles traveled and greenhouse gas emissions (usually solved by people living closer to
destinations and using alternative modes of transportation such as walking, biking, carpooling
and taking public transit). Advancements in technology provide new solutions such as the use of
shared electric vehicles and system improvements to signals and dynamic traffic lane
assignments that make better use of existing transportation infrastructure.

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<td>E311</td>
<td>Ed Noland</td>
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<td>I fully support the concept of free public transit. By free, we are talking about paying for transit by means other than riders per-use fees. I can drive on most roads without paying a per-use fee. Why not extend this to public transportation. I'd like to suggest that the concept of exempting fully electric vehicles from the per-mile fees be examined. The type of person that gets hit by this per-mile fee without the option to use free transit is like my or most independent lawn care, pest control, or appliance repair workers who can't afford to live anywhere near the west side of I-5. They must drive a longer distance with their mowers or other required equipment. I guess the solution to this is to increase our services workforce will have to raise their prices a bit. Unless, they can afford the new all electric F-150 pickups and the electrical vehicle exemption is implemented.</td>
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<td>E312</td>
<td>Edgar L. Morse III</td>
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<td>I am a 50 year + resident of San Diego, and I am OPPOSE the taxation of mileage on motor vehicles. This tax hurts the common working man or woman. San Diego is a large city and 8) DO NOT TRY TO FORCE PEOPLE OUT OF THEIR PERSONAL VEHICLES. Current vehicle technology and future technology will reduce greenhouse gases from transportation and clean up the environment. Thank you for voting NO on the current RTIP and developing a plan that is suitable and beneficial to all San Diego County residents — urban, rural, young, old, seniors, working folks, retirees, San Diego proper, North County, East County, South County, etc. — not a plan that benefits just a few residents at the detriment and cost to others.</td>
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The transportation system is designed to provide convenient travel choices for residents, employees, and visitors. Fast and frequent transit remains the most effective way to move a lot of people and studies indicate that this will continue to be the case well into the future. Commuter rail operating along the region’s urban corridors, can serve longer-distance regional trips and providing a remedy for today’s congested corridors. Additionally, Flexible Fleets like e-bikes, shuttles, or autonomous ridesharing will be available to serve shorter trips or areas where traditional fixed transit may not work well. Analysis during development of the Plan found that over 90 percent of the county’s population is within a 10-minute Flexible Fleet ride to transit. Together, these multimodal services provide greater and more convenient choices than what is available today. SANDAG is planning to start testing and launching Flexible Fleet pilots in 2022. Pilots will be designed to provide affordable and convenient options based on community needs.

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<td>E314</td>
<td>Emad Mirgoli</td>
<td>I am a resident of the City of San Diego and live in the Hillcrest area. The 5 times I have ridden the bus I have had to stand near piss and s*** covered bus stops (take a look at the stop on University &amp; Vermont). Now you want to charge me a per mile fee on top of the gas tax to pay for free fare for your s***** service? F***** enough bullshit from you and your s**** director from LA. Send him back and stop forcing b***** down our throats.</td>
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E316  George Kneeshaw  I am completely against the SANDAG plan. I have been paying TransNet taxes since 2004 for promised projects that have not been done. The SANDAG board of directors ordered Hasan to begin the environmental study for widening hwy 67 and he did not comply. He should be terminated. In fact SANDAG should be disbanded and CalTrans handle our highways. More taxes, and mileage meters are more socialist crap we do not need and do not want. In my area there are no reliable mass transit alternatives and likely never will be. Take your buses, trains and bike lanes and let those who use them pay for them. Put the TransNet money to the promised upgrades and no new taxes. Remember fire Hasan Ikhrata.

year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

E315  Emily Deibler  I have read the reports that an upcoming vote to increase a fee/tax on miles driven in the state of CA is coming up. I urge you to NOT pass this fee. It will hurt the workers that are struggling already after the last year. I know it isn’t for another couple of years- but we need time to adjust from so much closure and new demands of business to keep our customers safe. Imposing another fee or tax to just get to work- will be detrimental to so many and further drive away those that love our beautiful state. It just doesn’t make sense.

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<td>E317</td>
<td>George Ramirez</td>
<td>Tax me to death!</td>
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<td>E318</td>
<td>Gi Gongu</td>
<td>Who do I contact to voice my opposition of the proposed “Track and Tax”?</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E319</td>
<td>Grace Lowenberg</td>
<td>I am a registered independent voter and have voted in every election since I was first eligible to vote. I will NOT vote for any SANDAG proposed tax increase unless and until the promised</td>
<td>The TransNet measure approved by San Diego county voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed.</td>
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improvements to widen State Route 78 and State Route 52 for all cars that we voted for back in 2004 have been constructed. And, I plan to actively campaign against any such tax increase. SANDAG continually over looks those freeways in favor of the I-5 and I-15 and now in favor of misguided public transit options which will not deliver the unrealistic ridership projections SANDAG forecasts.

Moreover, your plan ignores the fact that all-electric vehicles and driverless vehicles are just around the corner. These new technologies will provide greater reduction in greenhouse gases and accidents at far less taxpayer expense. Your plan has been overtaken by these innovations and is already outdated. Californians will not give up, nor should we have to give up, the freedom and convenience of our own vehicles. The SANDAG plan is as misguided as the bike lanes recently installed in Hillcrest, only it will cost far, far more.

And, the necessary land acquisition alone is highly likely to result in massive cost overruns not to mention years of litigation and may never be achieved. It will be similar to the state bullet train fiasco all over again. For these and many other reasons, SANDAG should ditch the plan in favor of less costly, realistic options that will actually address the real future needs of San Diegans.

We rely on our cars. I have to drive from El Cajon to Vista on a regular basis to care for my elderly Mom, who uses a walker. I have to drive her regularly from Vista to Encinitas for doctor visits then back to Vista then I drive back to El Cajon. That can take as long as 3 hours on the road. And you expect me to do that using public transportation? Not only will I have to take an entire day off work, but she simply will be unable to do that. If I use my car to drive her to her doctors appointments, then you’re proposing to charge me another tax on top of the gas tax???!?! You need to EXPAND the freeway lanes and give us what SANDAG promised in freeway expansions in 2004. We will NOT vote for any taxes to pay for your plan.

The remaining projects in the TransNet measure are not likely to be constructed due to three primary factors: 1) changes in regional needs 2) changes in state law and 3) technology advancements that would suggest a different transportation solution. The changes in regional needs are the result of slower population growth than anticipated and a change in anticipated land use pattern from a sprawling pattern to a more focused development pattern with new growth occurring within existing urbanized areas. State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, or using electric and electric charging and taking public transit). Advancements in technology provide new solutions such as the use of shared electric vehicles and system improvements to signals and dynamic traffic lane assignments that make better use of existing transportation infrastructure. The local elected officials of the SANDAG Board of Directors may review the TransNet ordinance and list of projects to discuss possible updates. This process is outside of the development the 2021 Regional Plan.

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<td>E321</td>
<td>Irene Raymundo</td>
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<td>My name is Irene Raymundo and I am a resident and registered voter of San Diego. For the record, all my family and neighbors oppose the mileage tax proposal and will vote against any politician that supports the proposal. Respectfully when does the increased taxation stop. Better use of current taxes is a more responsible solution. The working class are leaving California for this reason. 2 of our neighbors relocated to other states and took their business with them.</td>
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<td>E322</td>
<td>J B Alberts</td>
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<td>Dear SANDAG, I write in complete opposition to any type of mileage taxation plan. Californians, and San Diegans in particular, already pay $0.79/gal in gasoline taxes. We will NOT pay another wasteful tax that politicians will squander on useless projects that we don’t want. Stop the mileage tax.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E323</td>
<td>James Bridgewater</td>
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<td>The mileage tax is a very odd tax. It funds San Diego City and pretty much leaves out North County, who are taxed as well. Do electric cars get a break? How about hybrids? Do the gas guzzlers get charged more? The gas tax had specific projects to fund which are now abandoned. San Diego County is big and mass transit for all is not a good thing no matter how much you want it to be. Please do not ruin this county for an impossible dream you have. Take things slow in small steps. The plan that your team has presented seems to be an impossible pipe dream. It will not work. The dream is good but not reachable on the way you are approaching it. Think about the actual people of San Diego for a while and you may get it.</td>
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<td>E324</td>
<td>James Mullady</td>
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<td>I have never written to a government entity before but the idea you are floating is too much. STOP trying to take away our cars. START spending our money on the roads. How much did the new Trolley line cost and how many people have used it? Enough is enough!</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.</td>
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<td>E325</td>
<td>Jan McNamara</td>
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<td>I can’t believe SANDAG is even considering a mileage tax! I live in East County. Do you have any idea how difficult it would be for me to travel? Anyway, forget about taking any trolleys to North County, even though I realize the Blue line will soon be going to La Jolla. This would require me to take a bus to the trolley station, catch a trolley then transferring to another trolley line once I arrived downtown. Then once I reach La Jolla it would require catching a bus to my final destination. Something I could accomplish in 20 minutes by car would take hours! Escondido would be no easier. I would like to know how all the directors of SANDAG travel around? I doubt very seriously it is by bus and trolley. I hope this proposal will be put to rest. It is not in the best interest of the citizens of San Diego.</td>
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The Mid-Coast Extension of the UC San Diego Blue Line Trolley is a SANDAG priority project. The $2.1 billion project will add eleven miles to the UC San Diego Blue Line Trolley, extending service from Downtown San Diego to the University Community. The Trolley extension will improve access to growing employment, education, and residential areas in addition to serving major activity centers such as Old Town San Diego, UC San Diego, and University Towne Centre (UTC). Construction for the project began in fall 2016 and service is anticipated to begin in November 2021. Transportation models indicate that the new trolley service will attract 20,000 new transit riders a day to the system.
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<td>E326</td>
<td>Janine Thorp</td>
<td>No No No. We are taxed too much already!</td>
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<td>E327</td>
<td>Jeff Zinza</td>
<td>Hello, I'm an avid cycling commuter who heard about the new program on the news this evening. If I'm not using my car to commute, how do I get credits for miles ridden instead of driven, especially if there will be a sales tax? Is there a way to track miles in order to get credits against the sales and mileage tax hikes? Just trying to understand how to avoid new taxing that are intended to promote the values that I already live. Please advise.</td>
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Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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<td>E332</td>
<td>Kelsey Thomas</td>
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<td>I live in San Diego County. I’m not sure if I’m contacting the correct person to discuss this, but I’m voicing my concern about the cents per mile tax. It’s not right and as high as gas is, it’s not right for you guys to do this to citizens of San Diego. There are families out there that have limited food and house finances. Along with that, public transportation is not feasible especially families with little kids taking them to school and going to work, taking a bus to work, that’s crazy! What about going to the grocery store? Taking a bus? Not possible. How will that work? You guys on SANDAG really need to think more about the citizens then your agenda.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E333</td>
<td>Kurt Hill</td>
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<td>Hello, There are a number of very obvious questions that I feel are not being answered (or I cannot find the answer to) regarding the proposed mileage tax. While I understand and support the concept of a user-fee, I also have concerns. Would you please answer these questions, or direct me to the appropriate contact to get those answers? Will the gas-tax be eliminated if I am paying a use-fee, or is this going to be in addition to the existing gas tax? How will various equity issues around this be addressed? In particular, the price of housing forces many lower-income residents to find homes in far-flung communities (Temecula, etc.) and they already have to deal with a huge commute and the expense of driving &amp; maintaining a car. These are exactly the people who will be hardest hit by a use-fee, whereas those who can afford to live close to their workplace will probably save money. Is the intent to force the poor to use public transit? If so, is the cost of their time being addressed? By this I mean that it can take significantly longer to get anywhere on public transit, so forcing people onto public transit has a very real cost</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.</td>
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### Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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<tr>
<td>E334</td>
<td>Laura Vega</td>
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<td>in the time they have for themselves and their families. Imagine commuting from Temecula to work on public transit -- probably two hours each way if we build a good system to support that commute. These seem like fairly obvious concerns, so I assume some research has already been done -- can you point me to any informational items that address these inequities? Someone living in Temecula would face a nearly 50 mile commute if they worked in the Claremont area of San Diego. This would cost them ($0.04/mile) an additional $4 per day to commute, or $80/month. That’s a significant new bill for many people. These new taxes do not affect everyone the same. When the system is structured so that the poor need to live far from work, and then the system is changed to punish the people that live far from work, how is that equitable? We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. SAN DAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. For more information on our community-based outreach please see Appendix H - Social Equity: Engagement and Analysis.</td>
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<td>E335</td>
<td>Lee B</td>
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<td>Why don’t you idiots make the 7 or 8 garbage trucks that visit my neighborhood (and others) EVERY F<em><strong>ING DAY pay for the damage they do to roads? It’s a rhetorical question because there are no trucks, only fools and morons. People have come up with numerous schemes to make people pay for trash hauling services instead of once a week services completed by the Cities which are much less expensive because once a week trucks don’t tear up the roads. Tax the “private” tax trucks to compensate for the damages they do and do a “per mile” on them so they don’t drive on the streets every damned day. This was all illusory anyway as homes that use City Services for trash hauling pay for that through property taxes, which go up the maximum under Prop 13 every year anyway. You fools can’t figure out how to get every penny out of us, can you? I don’t see why you can’t just tax the per mile big trucks that tear up the roads and put sales taxes on the rest of us. The sales taxes would be good because in this “throw away economy” people would be forced to buy less. I always hear how the sales taxes and plastic bag fees will disproportionately hurt the poor and the poor buy the same useless environmentally unfriendly c</strong></em> that everyone else does. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know there is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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| E336 | Leland Hamby   |        | Dear SANDAG, Thank you for getting me politically active. I have had enough of your hard nose antics. I will actively seek to remove all of you from this outrageously unproductive board. I oppose a mileage tax and added gas taxes that do not improve our highways. Yes I have used our poor public transit and it leaves me with a long walk. I am disabled and that is a chore. | Lastly, SANDAG will create a framework, called the Fix it First Strategy, which aims to repair our region’s existing roads and develop long-term maintenance of our transportation network. More detail can be found in Appendix B. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there is a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.  |}

<p>| E337 | Lili Feingold |        | Dear Friends at SANDAG, I am adamantly AGAINST your proposed mileage tax. It is UNTENABLE in San Diego. We are already being nickedled and dimed at every turn. Now you want to tax us for the road usage cost? We’re already paying huge gas taxes and high auto registration fees. No. Absolutely not. I am a school teacher and I can only afford to live far from my place of work. I did the math, and your ridiculous mileage tax would add upwards of $200 to my monthly costs. I will do everything in my power to encourage my fellow San Diegans to vote against this nonsense. Do not burden us with more tax hikes. | Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there is a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. |</p>
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<td>E338</td>
<td>Linda Steiner</td>
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<td>Please do not support the proposed mileage tax. We are long time residents of San Marcos, living on a senior’s income. We cannot afford the taxes you are proposing.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E339</td>
<td>Lindsey Hansen</td>
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<td>Dear SANDAG, No more taxes. No more taxes for public transportation. Stop trying to tax us out of our cars. This is a terrible idea. Stop this now.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E340</td>
<td>Matthew Demer</td>
<td>San Diego 350</td>
<td>Hi, my name is Matthew Demer with San Diego 350. I am writing because I wanted to thank the staff at SANDAG for their progress around transportation in this RTP. However, San Diego needs safe and accessible alternatives to car transportation in order to address climate and equity goals and this plan doesn’t move quickly enough to meet the urgency of the climate crisis and give those reliant on transit the relief they need. All of my family members who live and work in San Diego have made the decision to regularly bike to work. This is an important practice which the city’s transportation and bikeway infrastructure should support, and can do so by constructing universal vertical sight line markers, if not curb protection, for bike lanes to clearly demarcate space and help keep bike commuters safe. I also strongly support the grand central station project and trolley airport extension. The key to getting tourists, the heart of our economy, on foot is by rolling out the full red-trolley-carpet on arrival. The easiest way to arrive in our city should be made sustainable.</td>
<td>Reducing emissions from all sectors is critical for the state to meet its goal of “carbon neutrality” by 2045. Implementing the 2021 Regional Plan, while also facilitating the development and implementation of local Climate Action Plans (CAPs) across our region, will help everyone—the State, SANDAG, cities, and other public agencies—achieve their climate goals. The Regional Plan does not include details on project designs, but SANDAG looks forward to partnering with local jurisdictions and others as it implements the Plan. Advancing renewable energy, including solar power, will be key to a carbon neutral future. SANDAG follows national and international best practices in bikeway design to create safe facilities for users of all ages and abilities. Multiple studies show that most people feel safer in protected bikeways, and when well designed, they are safer than any other type of bike facility. The focus of our efforts is on people who may be “interested but concerned” in riding a bike alone or with family. For those who do not feel comfortable riding in protected bikeways, the</td>
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| E341 | Michele Winters |        | Good afternoon, I’m writing in regards to the proposed tax per mile this organization wants to bring to the people of San Diego. First of all, you should all be ashamed of yourselves for even considering another tax. The city and surrounding counties of San Diego are not designed well for public transportation. The area is too spread out and we have a lot of rural areas. There’s not even a bus stop close to my house nor would I even have the desire to use public transportation because my commute is over 25 minutes. I couldn’t even begin to imagine how long it would take me to get to and from work.

We already have the highest gas prices, taxes and cost of living here in California and you want to add more on top of that? That’s asinine! The second most ridiculous idea is putting transponders in our vehicles to track the mileage. That’s one of the most invasive and disturbing things I have heard. I don’t know how the employees at SANDAG even sleep at night just knowing the kind of garbage they want to throw on the citizen’s in San Diego. Do you want more people to move out of this state? Is that what your game plan is? Our city council and mayor have already turned this garbage they want to throw on the citizen’s in San Diego. Do you want more people to move out of this state? Is that what your game plan is? Our city council and mayor have already turned this great city into a hell hole. San Diegans have already dealt with enough since Covid started and to bring to the people of San Diego. First of all, you should all be ashamed of yourselves for even considering another tax. The fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.

The transit system envisioned in this Plan responds to updated growth projections and focuses on high-speed services that will connect jobs and offer service with similar travel times as autos. Previous plans focused on access but not necessarily speed of travel and equivalency with other options, thereby making these planned services much more desirable to the traveling public. SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.

We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.|

| E342 | Michelle Bales |        | Hi, I was given this email to voice my concern over the proposed mileage tax. I oppose having the $.04 per mile tax. Not only have the gas prices risen, but everything else has risen as well, including my rent. I finally get a 5% increase a little over a week ago, to then on the first get a 9% rental increase. Definitely behind the curve ball on this one too. This will create a hardship, not only for myself, but I can imagine everyone else.

I don’t have a solution, but I know this is related to the electric vehicles. Maybe charge more for their yearly registration? I don’t know how determination of one’s mileage will work, especially when people travel out of the county. How is it going to work when I travel to see my family in AZ or go up to Los Angeles or elsewhere in the States. I only see major problems trying to enforce something like this. And how does it work when a city in the County votes against it? Makes it even harder to calculate.

There’s got to be another way, people are still having money problems from 2020 and do not need more increases. | California Vehicle Code allows people to bike in the roadway with traffic. While protected bikeways are a great solution in many cases, we know they are not always the best solution. Every project goes through a detailed and context sensitive design process which results in decisions regarding the best facility, which may include protected bikeways, buffered bikeways, shared use paths, or shared streets with significant traffic calming elements. The Regional Plan also includes funding for upgrading existing bikeways that may not meet current best practices in maintenance or bikeway design. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. |
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<td>E343</td>
<td>Mike Wagner</td>
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<td>I am a native San Diegan, San Diego property owner since 1988, informed, and vote. I use SR-67 daily for my commute to work and have experienced several life-ending events on this highway. Traffic trauma on SR-67 is an ongoing nightmare. As the Comprehensive Multimodal Corridor Plan is in development, I implore Caltrans and the San Diego Association of Governments to fix the dangerous and obsolete corridor between Ramona and Lakeside. As you are aware, San Diego county taxpayers passed the TransNet Tax to include widening SR-67 to four lanes. The long-term political neglect of this crucial corridor is unacceptable. The political redirection of improvement funding is happening again with a $177-billion-dollar transportation vision entitled &quot;The Five Big Moves&quot;. This vision is ridiculous and the extravagant price tag simply does not economically fit our community. Please use our tax dollars as intended to widen SR-67 to four lanes which will greatly improve safety and provide effective emergency evacuation.</td>
<td>The Regional Plan primarily includes safety improvements to address crashes and evacuation needs in the rural areas, the event of wildfire or other disasters. However, in conjunction with the Regional Plan, SANDAG and Caltrans are actively preparing the San Vicente Comprehensive Multimodal Corridor Plan, which is a more focused effort to identify projects and strategies that integrate transportation options, wildlife connectivity, and technology deployment to improve mobility and evacuations along the SR 67 corridor. The Plan for SR67 includes safety and operational improvements such as shoulder widening, curve realignments, and technology improvements from Mapleville to Dye Road in the plan phase year 2035. These additional improvements could help address crashes and evacuation needs in the rural areas, evacuation in the event of wildfire or other disasters. Appendix Q also describes emergency evacuation strategies, including signaling, traffic control guides, roadblocks and barricades, electronic signage, land expansion, contra-flow lanes, traveler information services, use of mass transit, and airport uses.</td>
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<td>E344</td>
<td>Mikik Cosmikik</td>
<td>SANDAG</td>
<td>SANDAG members and staff, I want to thank the staff at SANDAG for their strides in addressing climate and equity in this Regional Transportation Plan draft, this plan doesn’t move quickly enough to meet the urgency of the climate crisis and give those reliant on transit the relief they need. We ask that you move faster in meeting targets for emissions reduction, transit projects, and the hours of service and frequency of transit so that our public transit system can be a meaningful alternative to cars.</td>
<td>The 2021 Regional Plan is required to reduce greenhouse gas (GHG) emissions from passenger vehicles and light-duty trucks by 19% per capita by 2035 compared to 2005 levels, as mandated by Senate Bill (SB) 375. The SB 375 reduction target must be achieved by reducing per capita VMT, not through the use of zero emission vehicles. Reducing emissions from all sectors is critical for the state to meet its goal of &quot;carbon neutrality&quot; by 2045. Implementing the 2021 Regional Plan, while also facilitating the development and implementation of local Climate Action Plans (CAPs) across our region, will help everyone—the State, SANDAG, cities, and other public agencies—achieve their climate goals. The Regional Plan does not include details on project designs, but SANDAG looks forward to partnering with local jurisdictions and others as it implements the Plan. Advancing renewable energy, including solar power, will be key to a carbon neutral future. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.</td>
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<td>E345</td>
<td>Nancy Shields</td>
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<td>Among your various ideas this ranks #1 on the worst ideas list. Hello. I am strongly voicing my opposition to this proposed amendment. Californians already pay some of the highest taxes in the nation on most everything. We do not need another unfair tax, and especially not this one. I understand that we need to reduce carbon emissions and increase public transportation. California also needs to improve roads, and freeways. However, a per mile tax will unduly hurt those on fixed incomes, &amp; low income households who are barely making ends meet now. Public transport is great, but not for everyone. California will never be a state that relies heavily on public transportation. Trying to force it on the general public by making it too expensive to drive is wrong. Please do not burden an already overtaxed region with yet another expensive mistake. Thank you.</td>
<td>We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E346</td>
<td>Nina Buenaviaje</td>
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<td>Hello. I am strongly voicing my opposition to this proposed amendment. Californians already pay some of the highest taxes in the nation on most everything. We do not need another unfair tax, and especially not this one. I understand that we need to reduce carbon emissions and increase public transportation. California also needs to improve roads, and freeways. However, a per mile tax will unduly hurt those on fixed incomes, &amp; low income households who are barely making ends meet now. Public transport is great, but not for everyone. California will never be a state that relies heavily on public transportation. Trying to force it on the general public by making it too expensive to drive is wrong. Please do not burden an already overtaxed region with yet another expensive mistake. Thank you.</td>
<td>We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person or vehicle drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person or vehicle drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.</td>
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San Diego Forward: The 2021 Regional Plan

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<td>E347</td>
<td>Noah Silva</td>
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<td>I have a family and I have to drive 24,000 miles a year for work and this would kill me. You guys are truly greedy and have no sense of how this would affect most people. I wish I had something nice to say to you guys but I don’t wish you the worst.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E348</td>
<td>Patricia Borchmann</td>
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<td>I join many other stakeholders who want to see Appendix AA, Regional Habitat Conservation Vision (May 2021) be brought forward into the body of the SANDAG Regional Plan, instead of taking a backseat by being concealed in an appendix that is largely unseen. In fact, the Draft EIR is incomplete, since this essential Appendix AA is not even listed in the EIR Table of Contents, or appendices. The important policy priorities identified in Appendix AA need to play a central role in shaping SANDAG policy, and drive transportation options considered by decision makers to make informed choices on SANDAG 2021 Regional Plan. Stakeholders in San Diego highly value the region’s biodiversity which makes San Diego the home to the highest diversity of endemic plants and animals found nowhere else in the world, so it is reasonable to demand an EIR which more fully reflects the hotspot resources which are at risk. Additionally, stakeholders demand that the SANDAG 2021 Regional Plan be expanded to analyze a transportation system in San Diego that applies a cohesive policy framework to support a land use pattern that accommodates our region’s future employment and housing needs and protects sensitive habitat and resource areas in San Diego for current and future generations. Unless and until the EIR reflects the policy framework necessary to conform with SB 375 (Steinberg, 2008), then it appears that the Draft EIR and SANDAG 2021 Regional Plan (as currently written) fail to meet the Sustainable Communities Strategy (SCS) requirement. On page AA-12 of the Regional Habitat Conservation Plan, the document states: “While several barriers have been identified in implementing the vision for regional habitat conservation, the role of SANDAG as the regional planning agency and its commitment in its development of a Sustainable Communities Strategy will provide new opportunities to fulfill the promises made during the adoption of the region’s various regional habitat conservation plans. SANDAG will</td>
<td>This comment is responded to in the Final EIR. Please see Comment 3 in Appendix P to the Final EIR.</td>
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<td>E349</td>
<td>Paul Wu</td>
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<td>Hi, we are living in Carmel Valley more than 10 years but no bus comes. We need bus to UTC or downtown, reasons shown below:</td>
<td>Flexible Fleets will offer people a variety of on-demand shared vehicles. Flexible Fleet services may complement fixed-route services, even in more suburban communities. They offer additional convenience, as the on-demand nature of Flexible Fleet services allows people to book a ride almost anywhere and anytime. Proposed Clean Transportation policies will also ensure that Flexible Fleet vehicles transition to zero-emission vehicles to further meet air quality mandates. In addition, the Regional Plan proposes investments in active transportation and Vision Zero policies to create a safer environment for biking. These strategies combined will make it easier to drive around without driving a car.</td>
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<td>First: There are 3 High schools (Torrey Pines, Cathedral, Canyon Crest) and many shopping centers (Beachside Del Mar, One Paseo, Del Mar Highlands, Pacific Highlands Ranch and more) on Del Mar Heights Rd. Government need to provide teens and youth a safe bus to get to school, work, food and shopping. Now there are many walking along DMHS Rd. which is not safe (Carbon unsafe crossing, etc) and many underage teens resorting to use Uber to other ride services which is neither legal nor safe. As a parent, I feel much more confident letting my teens ride the bus.</td>
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<td>Second. Nearly all older Americans live in Carmel Valley say they want to live independently in their homes and communities for as long as possible. People believe older Americans should have that opportunity, and we government have been working to ensure they do. But unless people have safe, convenient and affordable transportation options, they will be stuck at home or will be at greater risk on the roads than they need to be. Having access to transportation is critical to staying connected to family and friends and to pursuing day-to-day activities, both those that are essential and those that enhance the quality of life. We look forward to hearing about a Carmel Valley bus coming from you soon.</td>
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<td>E350</td>
<td>Peter Bryan</td>
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<td>The long overdue project to upgrade the Interstate 5/California 78 needs to be the highest priority in the Regional Plan. The congestion created by this interchange affects more commuters than any other project listed in the plan. It also impacts visitors to San Diego who use the I-5 corridor to get to/from our City. This must be a higher priority, as it affects our health, well-being and economy!</td>
<td>The 2021 Regional Plan includes Managed Lanes on SR 78 and construction of a Managed Lane connector for I-5/SR 78 by the year 2035. Additionally, HOV lanes are included on I-5 from Manchester to Vandegrift in 2025.</td>
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<td>The 78 Freeway needs to be extended to Coast Highway to enable coastal access for millions of residents of northern San Diego County and Southern Riverside County. Don’t let a few selfish residents of Oceanside prevent the region getting to the beach.</td>
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<td>E351</td>
<td>Randy L. Atkinson</td>
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<td>You folks over at SANDAG are crazy! Only 3% of the population uses mass transit. That means 97% don’t use it and probably only 10% of that could use it. Before I retired, I worked at 2 separate hospitals and mass transit was not an option. Now I volunteer 3 days a week in Alpine (from Oceanside) and there is no way I can get there on bus or train!!! Use your brain will you.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region.</td>
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Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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<td>E352</td>
<td>Rebecca Neary</td>
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<td>I don’t drive often as I am retired but I do live in Jamul where I found an affordable rental. I have tried to take public transit, we have a rural bus that runs a very few times a day, no nights and weekends and very few stops. I have used the trolley park and ride to go to downtown San Diego and Balboa Park but other trips take so long due to transfers to local busses that I would spend more time getting places then being at them. With the latest trend of persons randomly attacking people unprovoked the trolley stations are maybe a little shaky. I have talked to MTS and San Dag before and they just said that is how it is for rural folks, so I combine trips when I do take the car but I really can’t use bus here. Smaller, hybrid or electric AFFORDABLE cars may be the best solution.</td>
<td>SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The transit system envisioned in this Plan responds to updated growth projections and focuses on high-speed services that will connect jobs and offer service with similar travel times as autos. Previous plans focused on access but not necessarily speed of travel and equivalency with other options, thereby making these planned services much more desirable to the traveling public. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.</td>
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<td>E353</td>
<td>Rebecca Rigaud</td>
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<td>Hey guys, as a realtor who has to drive all over without pay... this won’t work.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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San Diego Forward: The 2021 Regional Plan

San Diego, CA 92101

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<td>E354</td>
<td>Renay Johnson</td>
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<td>You are delirious if you think taxing roads is the right thing to do. You (SANDAG) will be turning literally every damn road in San Diego into a toll road. What pisses me off is that you know SANDAG executives will not be paying this tax and will find a way around it. Residents of California and San Diego are being taxed to death already. The sad thing is that the taxes that are supposed to be going to roads and transportation are not. What happened to that money? There are people living on the edge already and cannot take another tax. There are people who work two or three jobs just to exist and now you narcissists want to impose a tax per mile on drivers. Not everyone can ride transportation to work, not everyone lives on the bus route and can ride the bus to work. Not everyone makes enough money from one job. I suppose the simple answer is to move to another state. Guess what? People can't even afford to move right now and leave this state and I am one of those people. Residents have gone through a pandemic and lost jobs and income and trying to reboot their lives only to get hit with more taxes. Way to take advantage of a pandemic. This agency should be ashamed of themselves. You (SANDAG) already got your way with the bikes lanes and removing almost 2 miles of parking on 30th St in the City of San Diego. What else the hell does SANDAG want? This agency is crippling this city with the notion that everyone will ride their bikes or public transportation. SANDAG now “promises” free transportation but I bet that won’t even happen. You know who will be riding this “free” transportation? The homeless will be riding it with all of their possession, trash, carts and pets. They will get on the transportation because it’s free and enjoy the free ride because no one is going to put up with their poor behavior or lack of hygiene. You will have the homeless and underbelly citizens of the city riding the free transportation conducting their illegal activities because no one will want to be on the bus for free. This is by far the dumbest thing I’ve heard of an agency bringing to the public. You all are playing God with people’s lives and just causing problems for people who are trying to make a living. You can rot in hell and go fuck yourselves you greedy bastards.</td>
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| E355 | Rich Robson   |        | Hello, is the proposed mileage tax in addition to gas taxes or is it a replacement for the gas tax? | Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system. |

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<td>E356</td>
<td>Richard Emmett</td>
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<td>My name is Richard Emmett. I am a retired Systems Analyst with a particular interest in the future of city transportation. I am very impressed by SANDAG’s Draft Regional Plan and your commitment to addressing climate change, jobs, justice, and improving transportation. But I am concerned this is a very tall order, given our area’s projected growth in traffic flows! I realize your deadline for public input has passed, but I believe there is an approach to transportation that could significantly improve the chances of achieving your goals. Specifically Aerial Transportation: Individual vehicles traveling on cables above the city. Modern aerial vehicles can operate much faster than older cable cars and be fully automated to improve safety and reduce operating costs. Lightweight aerial vehicles will use much less electricity than heavy electric cars and greatly help eliminate GHGs. Cables and towers will be much less expensive to build and maintain than roads and intersections. A network of cables and towers with automated switching can provide transportation to an entire city. We can reserve more of the surface area for pedestrians, bicycles, shade trees, etc. People will want to use the system because it is faster, safer, and cheaper than driving. I have summarized this idea in a short video: Available on YouTube at: youtu.be/b-ohqAw0tU And I have described the idea in more detail in my book: A Practical Aerial Transport System Environmentally Friendly Transportation for the Cities of the World. Available on Amazon at: <a href="https://www.amazon.com/s?k=B086MFN2RP">https://www.amazon.com/s?k=B086MFN2RP</a> I would be happy to provide copies (in electronic form) free of charge to any members of your staff that may be interested and would much appreciate any comments you may have. I am committed to your organization’s goals, and if I can be of any further assistance, please do not hesitate to ask.</td>
<td>We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.</td>
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<td>E357</td>
<td>Rick and Susan Clifford</td>
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<td>Shame on your organization for allowing and voting for yet another tax in San Diego County. This is ridiculous. My husband and I will sell our cars. You'll never get any money out us. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E358</td>
<td>Robert Mickschl</td>
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<td>I am not in support of a new tax on driving my car on our public roads. With all of the money that has been appropriated over the past 65 years of my life, enough is enough! We will do everything possible to oppose this and expose those who stand to profit from this. The tax payers are not going to allow this. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region.</td>
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<td>E359</td>
<td>Roger Ramsey</td>
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<td>I recently read of various proposals to further tax San Diegans. I am a 20 year resident of San Diego. The cost of living in California is already the highest in the nation. Thanks to the gas tax we pay at least a dollar more a gallon than any other state. How much more money does the County need? The proposal to charge a fee-per-mile is a horrible tax on those who can least afford it. The people who have the lowest paying jobs and live the furthest from their place of employment will suffer the most. They already are punished by high fuel prices. This will drive more and more service and blue collar workers out of the state. Why are we subsidizing the middle-to-upper income buyers of electric cars? Tesla buyers do not need a tax break, they can afford the full price they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E360</td>
<td>Shani Reese</td>
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<td>We are opposed to the ridiculous mileage tax. We pay enough taxes to drive on poorly maintained roads! Enough is enough!!!</td>
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<tr>
<td>E361</td>
<td>Shannon Bodnar</td>
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<td>To all elected officials on this Board, My name is Shannon Bodnar and I am a 25 yr resident of San Diego County. I am a hard working, dedicated public school teacher who had to settle many, many miles from where I work due to the high cost of housing. The 2017 gas tax has hit people like me and people significantly worse off than myself, very hard. And now you're considering adding a mileage tax? Whether you tax per mile or tax in lump sum these actions would devastate hard working, middle and lower socio-economic families. As Californians we already pay more taxes than anyone in any other state (except for NY). Please don't shake us down for more money. The state and the county have already taken more than what's fair and will need to do what so many of us have had to do at each of these &quot;tax shake downs&quot;...look at your budget, cut from one area to pay for something else. California government officials MUST STOP coming to the tax payers demanding more money. We will remember who stood in favor of more shake downs and who stood up for us in future elections.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>E362</td>
<td>Stephanie Adams</td>
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<td>Good morning. I can’t believe we are looking at another tax. This one hurts Californians. I am single mother and the thought of having another tax will hit my pocket book. We already have the highest taxes! I am an educator and what extra money I do have I buy materials for my classroom. This tax will ruin families, family vacations and people who need their vehicles for work. Here are some other issues: Families can take public transportation to drop off/pick up their children at schools. Children’s after school activities that are all around at different places. Kids/Adult who play sports and travel around California. Family trips/trips around the state for holiday- this would be an added expense. Like me and so many others we need our car to carry items to work. Everyday I have at least 3 bags that I take into school. How would a person be able to take all of items onto public transportation. Taking public transportation would most likely another 2 hours onto my already 8 hour stressful day. Then it takes away from family time. How would do my errands: Grocery shopping. If I have an appointment I would need to take the whole day off just to get there! Why is the state trying to take over my right to drive my car and then I need to allow you to know where I drive, when I drive and what happens about the mileage outside of the state. This a terrible tax and I believe more people will the state of this passes. There is no way to provide public transportation for the people and for sure families! I have already had so many friends that have left the recently over other mandates. This tax is bad for Californians!</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>WHAT WAS THE ENABLING STATE LEGISLATION that created SANDAG? This is the law that WILL GET REPEALED (and SANDAG CEASES TO EXIST), if you implement a “per mile” road tax! Get ready to be dissolved SANDAG!</td>
<td>SANDAG serves as the forum for regional decision-making for the 18 cities and county government within its jurisdiction. As the San Diego region’s primary public planning, transportation, and research agency, it plays a critical role in regional policies about growth, transportation planning, environmental management, housing, open space, energy, public safety, and binational collaboration. As a result of Senate Bill 1703, which consolidated all of the roles and responsibilities of SANDAG with many of the transit functions of the Metropolitan</td>
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Transit System (MTS) and the North County Transit District (NCTD). SANDAG also is responsible for transit planning, funding allocation, project development, and construction in the San Diego region.

SANDAG is governed by a Board of Directors composed of mayors, councilmembers, and county supervisors from each of the region’s 19 local governments (with two representatives each from the City of San Diego and the County of San Diego). Voting is based on membership and the population of each jurisdiction. Supplementing these voting members are advisory representatives from Imperial County, Caltrans, MTS, NCTD, the U.S. Department of Defense, San Diego Unified Port District, San Diego County Water Authority, Southern California Tribal Chairmen’s Association, and Mexico.

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We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

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SANDAG will be applying a social equity planning framework throughout the implementation of...
I am writing to strongly oppose the $160 billion dollar transportation plan along with the per mile tax and increase in sales tax help the residents in the very rural parts of San Diego County? Are you going to build a trolley from Oak Grove/Sunshine Summit/Warner Springs to Escondido? So, each time I have to shop in Temecula and rarely Ramona, you’ll tax me $2.40 for the 60 mile round trip as those are the closest places to shop in proximity where I live. And a sales tax increase of 2 cents? You have to be kidding me. And what about the tax we voted in several years ago for transportation? Where did it go? Oh, mass transit for urban people. We subsidize urban dwellers? What’s up with that. Well, I have the answers; the funds were misappropriated in terms of supporting urban free riders, not the rural citizens of the county. You all just figure that if you spend your allocations, just establish a new tax. I think your positions should be voted in, not appointed. So, how are you going to track my mileage? Can’t wait till your biased plan, if you can call it that, goes to the popular vote because it sure isn’t a popular plan.

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SANDAG, it’s ridiculous that you would even come up with the idea of taxing people who drive in San Diego county to pay for your agenda of public transit. What part of county do you not understand? It is obvious that we could not all be on public transportation given the size of our county and the population. You already came up with the ridiculous gas tax. Come up with a plan within the budget you get from that.

How do you expect anyone to survive living in San Diego county with high taxes, high gas prices, high rent, high house prices, high cost of living and now to top it all off a tax for getting to work and back to pay for all the expenses we have as San Diegans. You have failed the people you

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### Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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<td>L439</td>
<td>Joe LaCava</td>
<td>City of San Diego</td>
<td>October 27, 2021 Honorable Mayor Todd Gloria, I am writing to respectfully request a revision of the Complete Corridor alignment through Marian Bear Memorial Park proposed in SANDAG’s Draft 2021 Regional Plan (RIP). SANDAG’s 2021 RP will guide San Diego’s future growth, and I value the hard work and extensive public outreach that have gone into the RP. I support the bold vision of the draft RP in reshaping mobility in our region and achieving our Climate Action Plan goals. The draft Plan proposes a three-lane expansion of State Route S2 between I-5 and I-805 to contribute to the regional Complete Corridors network. This expansion would occur within the 467-acre Marian Bear Memorial Park which is one of the oldest open space parks in the San Diego parks system. The park was created in response to the 1970s construction of SR-52 to preserve the environmental and recreational values of San Clemente Canyon, pushing the alignment of SR-52 to the less sensitive portions of the canyon. Expanding the present-day SR-52 outside of the current improved width would diminish the bold action of the leaders of the day. Further, it would disrupt and threaten wildlife and natural habitat in and around the park, impact the experience of users of the park, and, potentially, impact water quality in the San Clemente Creek which flows from the park into Mission Bay. To avoid these impacts and preserve the original vision, I ask that SANDAG pursue a constrained improvement that confines new construction to the existing unimproved median; alternatively, hold the southerly edge of the existing roadway with all new construction located to the north. Either option would eliminate, or at least minimize, impacts to the existing open space park. These options would contribute to the desired transportation connections while protecting the surrounding open space and habitat, maintaining the recreational value, and preserving the park’s legacy. I look forward to working with SANDAG on solutions that preserve Marian Bear Memorial Park and achieve the Complete Corridor alignment in SANDAG’s Draft 2021 RP. Please do not hesitate to contact Kathleen Ferrier of my office at <a href="mailto:kferrier@sandiego.gov">kferrier@sandiego.gov</a> or 619-236-6611 should you have any questions. Sincerely, Joe LaCava</td>
<td>SANDAG appreciates and agrees with the concerns of any potential impacts to our region’s parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan, as you suggest, will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.</td>
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<td>V4</td>
<td>Catherine Staub</td>
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<td>Hi this is Catherine from Escondido, I am calling to say I am greatly opposed to the 4 cent mile tax, whatever you want to call it. That’s an infringement on our rights. It’s government control and that’s absolutely no.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas</td>
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<td>V5</td>
<td>Fred Davis</td>
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<td>Yes this a San Diego citizen and I'm very concerned about the proposed 4 cent mile driving tax and I want to get more information about it. We protest it, and believe it is a real threat from SANDAG and contact me at *** *** ****, thank you.</td>
<td>Funded for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>V6</td>
<td>Glen Gillies</td>
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<td>Good afternoon my name is Glenn Gillian, I live in the north county of San Diego. I'm calling to leave some information, and thoughts about this proposed mileage tax. I read on a local news website that feedback was being collected through the end of today. My two cents worth is that, if mileage tax is I'm going to cut down the amount of mileage that I actually drive. I'm going to consolidate trips. I'm going to use less gasoline. And that doesn't seem overall like a good way to support the local economy. I'm sure I'm not the only one who will have to rethink running to the store every other day and that kind of thing. I'm a full-time caregiver for my elderly mother. I'm technically unpaid, my small business closed during the pandemic. And I don't feel like taxing... and we know California and San Diego have high taxes everything... I don't feel like adding a tax, psychologically a good way to go, for San Diego. I'm sure I'm not the only one like I said who will consolidate trips. think twice about going out, and will not actually spend more money on gasoline and so those taxes are collected. So those are my thoughts. Thanks for listening.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>V7</td>
<td>Helen</td>
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<td>Hi, I am not sure how to do this. But my name is Helen and I am wanting to very strongly voice my opinion of opposition to the local per-mile fee that SANDAG is considering and I know I'll contact the state as well but when I will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.</td>
<td>state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>V8</td>
<td>Larry Green</td>
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<td>I want to voice my opposition to the SANDAG Regional Transportation Plan, the one that is estimated to cost the tax payers $160 billion dollars plus a property tax increase. Could you give me a call back and let me know who the contact person would be for me and the representative for the SANDAG transportation committee would be from the City of Vista, I’d appreciate a call back. Please relay my opposition to the plan both the sales tax increase, the plan in general, as I live in Vista and am familiar with the Coaster plan which leaves empty every 15 minutes going both ways at a tremendous cost to the tax payer. We don’t need another plan that includes transportation such as that.</td>
<td>As requested, SANDAG staff called this individual to provide information on SANDAG Transportation Committee representation. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.</td>
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<td>V9</td>
<td>Rebecca Neary</td>
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<td>Hi my name is Rebecca **** my phone is **** *** and my email is *******, I'm calling and I've called before about the proposed usage tax on cars, I make about thirty thousand a year, I'm retired, and I don't drive very often quite honestly my car sits parked a lot but I do have to drive sometimes, I live in Jamul and there's almost nothing as far as public transit here, I guess there is going to be more next April but it's still not going to work for most things and then my friend Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.</td>
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<td>V10</td>
<td>Rebecca Neary</td>
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<td>Dawn is 70 and he lives in El Cajon and there’s actually buses there but he still works. He does performances for nursing homes and they’re only an hour long and he does 5 or 6 of them a week so they have to go to the nursing home and they have to bring equipment, their musical instruments and sound systems and all that and they have to do it five times a week so obviously he uses gas.&lt;br&gt;&lt;br&gt;Both of us would love to have electric cars but we simply can’t afford them, his income is about twenty thousand dollars a year and mine is about thirty and that’s just not what you can buy an electric car no matter how many incentives we are given we just can’t do it. What I do is I just drive less frequently but you can’t do that. And I think it’s psychologically important to him to still do these musical events and I think it’s psychologically important to the people in the nursing home. And if he didn’t do them, he’d be living just on his social security which is just eight thousand a year so that’s not good. So, these are the kind of people who might be affected negatively by a usage tax and I think um, we are doing our best, we are not driving SUVs or anything like that, giant trucks but we do have to live, also in Jamul, this is a high fire area so obviously we have to have a vehicle if we have to get out quickly. So I try to do it myself, I don’t drive much because I’m retired but Dawn has a special case I told you about, he has to drive, they have to go, even when we do things to go to the beach or something, we carpool so we are doing as asked. Maybe this is not an urban environment, I’ve lived in Boston and I never had a car there my whole life but out here I had to get one. When I was living in San Diego I still left it parked, I used the bus to get to work but that’s it. You can’t do this to us right now, thanks.</td>
<td>We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.&lt;br&gt;&lt;br&gt;We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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No, a gas usage tax, probably not a good idea. Trying to encourage people to have better mileage cars and electric cars, is a very good idea. But you have to help us, because we can’t afford them. It just seems like the only way we can do this.

When I used to live in Boston, I could go everywhere, I never owned a car. Till like 30 and I moved out here. Owning a car, I still use public transit, but now in this rural area I cannot. And I outlined in my own email reasons a person in these rural areas cannot. Thank you for your help.

We cannot afford a mileage tax on my car and there is no public transportation that will come and get me or my wife and we are physically limited by the amount that we can walk and we live on Dictionary Hill where it would be impossible with her knees or my lower back issues to walk up and down the hill we live on and unfortunately we cannot move somewhere closer to getting on the transit because of our credit. We have a house and we are in the process of getting the thing redone after the pandemic but we don’t have the ability to drop and move anywhere because of that. We are both on a limited income. My wife gets just her social security. I get my social security and my navy pension but by no means are we rich and we are below the poverty level established in the United States so I don’t understand how people expect us that don’t have any money to spare and are living paycheck to paycheck to be paying 4 cents a mile for transportation and saying that we drive 15,000 miles a year which we don’t. In fact, I drive maybe every other day or every two days. We certainly don’t drive all the time but the area we live in is not conducive to using public transportation and if public transportation can get you there in an appropriate amount of time, I’d be willing to take it but there is no way to get to it from where I live.

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SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. For more information on our community-based outreach please see Appendix H: Social Equity: Engagement and Analysis.

### Public Meeting

**M162 Aaron**

Hi, good morning members of the Board and Chair. Thank you so much for hearing my comment. To be honest this is something that kind of freaks me out as someone that’s lived in San Diego their whole life. I am 32 and the idea of paying more, I kind of want to ask when does the buck stop? How much is our local trying to squeeze the residents that live in San Diego? I know climate change is the number 1 concern but this generation we can’t afford it. This generation, we can barely afford to take care of ourselves, how are we going to be paying for you know. We have the gas tax and it’s supposed to be replaced by this and the four cents, when is it going to stop? When is the mismanagement of funds, how much is enough? I’m asking the Board, how much money will suffice? How tight do taxes have to be for you know residents to deal with this? In the presentation, this is a bold new vision for the region but how is it considered being paid for? The idea it actually was written down assume road usage charge began in 2030. So the idea for this giant vision for the region was just going to be assumed to be paid for. I don’t like the word “assume” it makes me feel as if this younger generation has to pay for the future. I just don’t think that’s acceptable. California is the third highest state to live in the United States and I just can’t keep up. I don’t know how I can make a future for myself in San Diego when I get nicedled and dimed left and right by local government and we just can’t pay for it all. Thank you.

Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and
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<td>M163</td>
<td>Ariana Federico</td>
<td>Mid-City CAN</td>
<td>Hi, good morning. My name is Ariana Federico. I am a lead organizer with Mid-City CAN. I currently work for the transportation team. We are requesting that the Board move forward with the commitment to evaluate free transit for all by 2023 and that it commits to funding youth passes 24 and under as soon as possible. We’re just also here to appreciate and support the 2021 Regional Plan. It has been an experience in ensuring that our communities are included, especially the 10 transit lifelines. I also want to address that we need to make sure that there are anti-displacement strategies to protect low-income communities of color that are living near the transit corridors. We want to make sure that our communities are here to stay while also participating in these plans that are really changing the region of San Diego. For 24 and under, we really need for that to be funded as soon as possible to increase ridership to ensure that we are supporting our young people that were hit the hardest by the COVID-19 pandemic. It also promotes a reduction of the greenhouse gas emissions. Overall, the road usage charge would replace the gas tax and it is really important to address that this Regional Plan is here to address the climate issues that we are seeing now. If that is what it takes then that is what will need to happen. Thank you for your time.</td>
<td>One of the Implementation Actions listed in Appendix B is a Regional Fare Impact Study. This study will examine public stakeholders' perception of the fare system and determine if the current structure is equitable. If the study confirms that the current fare structure is not equitable, adjustments will be made. The study will also consider the potential for a social equity planning framework throughout the implementation of the Regional Plan. Through this framework, one of the Regional Plan's near-term actions includes developing a Digital Equity Strategy and Action Plan that will address regional accessibility gaps in communications infrastructure, technology, and digital literacy. We have been working with our Community-Based Organization partners (CBOs) to ensure that language translations and educational resources on transit are available to all San Diegans as we advance with our next OS system and build upon improving our existing transportation systems. For more information, I would like to refer you to Appendix B: Implementation Actions, for more information on the Digital Equity Strategy and Action Plan and Regional Fare Impact Study.</td>
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<td>M164</td>
<td>B. Mittermiller</td>
<td>San Diego 350</td>
<td>Good morning Chair Blakespear and members of the Board. My name is B. Mittermiller and I’m with San Diego 350. I would like to talk today about focusing comments in this period. We need to be talking about solutions for fixing our transit system, lowering greenhouse gas emissions, and everything possible to avoid the worst impacts of climate change. Details about the plan can be hashed out later. Today is not a day where everybody is voting on the plan; it’s simply information. It is undeniable that we are in a climate crisis now. This year alone as of Wednesday a total of 2,839 fires have been recorded burning just under 2.5 million acres across the state. We are in a drought that leaves Southern California at risk for more fires before the year is even over. We are out of time to address this climate emergency. Transportation is the source of nearly half of our emissions in the county as a result of over-reliance on private vehicles. This is also an equity issue for those who depend on public transit. We need a world-class transportation system and this plan must be a long-lasting investment in our communities, equity, jobs, and our future. SANDAG has made substantial progress in doing more to reduce emissions and support transit equity including adopting the San Diego Transportation Equity Working Group’s 10 Transit Lifelines. Our communities and our families elected all of you to work together to solve problems. Climate change is a novel existential threat to us all. Please don’t waste valuable time by taking your eyes off of our common goal: survival. Thank you.</td>
<td>Reducing emissions from all sectors is critical for the state to meet its goal of “carbon neutrality” by 2045. Implementing the 2021 Regional Plan, while also facilitating the development and implementation of local Climate Action Plans (CAPs) across our region, will help everyone—the State, SANDAG, cities, and other public agencies—achieve their climate goals. The Regional Plan does not include details on project designs, but SANDAG looks forward to partnering with local jurisdictions and others as it implements the Plan. Advancing renewable energy, including solar power, will be key to a carbon neutral future. The 2021 Regional Plan is required to reduce greenhouse gas (GHG) emissions from passenger vehicles and light-duty trucks by 19% per capita by 2035 compared to 2005 levels, as mandated by Senate Bill (SB) 375. The SB 375 reduction target must be achieved by reducing per capita VMT, not through the use of zero emission vehicles. Appendix 5 includes documentation of SANDAG’s travel demand model and off-model greenhouse gas reduction calculators. These documents are required to demonstrate to the California Air Resources Board that the 2021 Regional Plan will meet the region’s greenhouse gas reduction target. SANDBAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. Through this framework, one of the Regional Plan’s near-term actions includes developing a Digital Equity Strategy and Action Plan that will address regional accessibility gaps in communications infrastructure, technology, and digital literacy. We have been working with our Community-Based Organization partners (CBOs) to ensure that language translations and educational resources on transit are available to all San Diegans as we advance with our next OS system and build upon improving our existing transportation systems. For more information, I would like to refer you to Appendix B: Implementation Actions, for more information on the Digital Equity Strategy and Action Plan and Regional Fare Impact Study.</td>
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<td>M165</td>
<td>Baylen Hernandez</td>
<td>Mid-City CAN</td>
<td>Good morning members of the Board and staff. I am the policy advocate with Mid-City CAN. First, I want to thank everyone for your incredible work on the Regional Plan. We are looking at a very comprehensive document with ambitious yet necessary and achievable goals. Second, I want to express our support for a change made to the draft. We support the proposal to evaluate free transit for all by 2030 and we also ask that as a step toward that goal you commit to funding youth passes 24 and under as soon as possible. Lastly, related to the land-use and housing aspects of the Plan. We are concerned that there is not enough anti-displacement strategies there and we ask that you please ensure the Regional Plan has strong anti-displacement mechanisms. Thank you.</td>
<td>One of the Implementation Actions listed in Appendix B is a Regional Fare Impact Study. This study will examine public stakeholders' perception of the fare system and determine if the current structure is equitable. If the study confirms that the current fare structure is not equitable, adjustments will be made. The study will also consider the potential for a social equity planning framework throughout the implementation of the Regional Plan. Through this framework, one of the Regional Plan's near-term actions includes developing a Digital Equity Strategy and Action Plan that will address regional accessibility gaps in communications infrastructure, technology, and digital literacy. We have been working with our Community-Based Organization partners (CBOs) to ensure that language translations and educational resources on transit are available to all San Diegans as we advance with our next OS system and build upon improving our existing transportation systems. For more information, I would like to refer you to Appendix B: Implementation Actions, for more information on the Digital Equity Strategy and Action Plan and Regional Fare Impact Study.</td>
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San Diego Forward: The 2021 Regional Plan

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<td>M166 Bill Tibbetts</td>
<td>Southwest Wetlands Interpretive Association</td>
<td>Bill Tibbetts representing the Southwest Wetlands Interpretive Association. SWIA has advocated for the protection and restoration of our region’s natural habitats over 40 years. As other speakers have said, natural habitats are an essential component of our greenhouse gas emissions reduction efforts. It would complement the RTP’s transportation and land-use approaches to reduce emissions. So, we support the current plan which would be improved by the proposed changes you’ve heard about today and it represents a necessary shift from inadequate RTP’s, so we support it. In particular, we support the increased plan investments to fully support this region’s habitat conservation plans to add to the acquisition and management. We also fully support the idea of a policy that keeps all future transportation system improvements within the existing developed footprint, removing redundant roadway connections and advanced strategies that will need soon. A bond or a sales tax that will help advance those issues including the Vision Zero safety and equity.</td>
<td>Appendix AA of the 2021 Regional Plan outlines the Regional Habitat Conservation Vision for the region. The appendix provides a brief history of habitat conservation in the San Diego region, describes how SANDAG, through the Environmental Mitigation Program, has contributed to habitat conservation and presents the goals and objectives of the Regional Habitat Conservation Vision in order to protect sensitive habitats and resources for future generations. As part of the 2021 Regional Plan, SANDAG will establish a Nature-Based Climate Solutions Program that will promote natural infrastructure that uses or mimics natural processes to benefit people and wildlife. SANDAG will prioritize resilience and innovative solutions in transportation infrastructure, Comprehensive Multimodal Corridor Plans, and consistent regional planning and implementation of the Sustainable Communities Strategy actions, emphasizing both nature-based and technological climate solutions. There are also further opportunities to expand upon ongoing efforts to assess the amount of carbon storage and sequestration potential of open space lands and the co-benefits from preserved open space, land management, and restoration activities. Many of the complete corridor projects in the draft plan utilize existing right-of-way, and in many cases existing roadway shoulders without encroaching into any additional land. This will greatly reduce environmental impacts, speed project delivery, and reduce costs. Where this is not an option additional project specific outreach and engagement will be conducted with affected residents and stakeholders. This process aims to develop projects with minimal impacts. Land use and zoning authority is reserved to local jurisdictions, however, SANDAG encourages cities to densify where transit is planned. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.</td>
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<td>M167 Bob Leiter</td>
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<td>Hi, I am Bob Leiter and I am speaking today as a resident of the City of Poway. First of all, I want to congratulate SANDAG staff on preparing an excellent draft Regional Plan. I support the written comments that were submitted by the City of Poway by David Devries, the city planner. I am glad that he suggested that the Scripps-Poway Parkway in the south Poway business park become a designated transit corridor and that multimodal safety improvements be made to State Route 67. I also want to thank SANDAG for including a commitment for adopting a regional framework for climate resilience. My family and I have lived in Inland North County for over 30 years and we have some serious concerns about the impacts of climate change in our communities and the vulnerabilities including the increased frequency and duration of wildfires, increased flood risks, increased health risks from extreme heat, and major impacts on the natural environment. I request that the final Regional Plan include the following specific commitments to climate adaptation. First, provide technical assistance to the cities that have not yet been able to complete the state mandated updates to the safety elements of their general plans and also the new requirement for environmental justice elements pursuant of the SB 1000. I understand that Southern California Association of Governments is already providing this service to their local governments. I’d also like to see SANDAG commit to a leadership role working with the Water Quality Control Board to prepare the necessary updates to the San Diego Basin Plan and the 11 water quality improvement plans and to assist the city in obtaining the necessary funding to make the necessary stormwater improvements and management programs. Thank you for your consideration.</td>
<td>The Regional Plan primarily includes safety improvements to address crashes and evacuation needs in the rural areas, the event of wildfire or other disasters. In conjunction with the Regional Plan, SANDAG and Caltrans are actively preparing the San Vicente Comprehensive Multimodal Corridor Plan, which is a more focused effort to identify projects and strategies that integrate transportation options, wildfire connectivity, and technology deployment to improve mobility and evacuations along the SR 67 corridor. For SR 67 safety and operational improvements such as shoulder widening, curve realignments, and technology improvements from Mapleview to Dye Road are included in the plan in phase year 2035. These additional improvements could help address crashes and evacuation in the event of wildfire or other disasters. Appendix Q also describes emergency evacuation strategies, including signaling, traffic control guides, roadblocks and barricades, electronic signage, land expansion, contra-flow lanes, traveler information services, use of mass transit, and airport uses. The County Water Authority is the agency responsible for projecting water needs in the region and their projections use the SANDAG Regional Growth Forecast as an input to their modeling effort. SANDAG considers stormwater, or urban runoff during the project development process and partners with regional transportation infrastructure owners and operators to manage stormwater from roads and highways in the region. For more information on stormwater, please see Appendix R of the 2021 Regional Plan.</td>
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<td>M168</td>
<td>Carolina</td>
<td>Environmental Health Coalition</td>
<td>Good morning board members and staff. My name is Carolina with the Environmental Health Coalition, we are here to express gratitude but also express concerns over the significant impacts. We really appreciate the staff and all the progress to elevate mass transit as a major solution to a climate crisis to air quality, especially to environmental justice communities. It’s the best solution that is actually financially feasible that should be implemented immediately and throughout the implementation of the plans of 2050. The concerns that we do want to elevate are related to the significant impact on substantial air contaminants. So the plan recognizes that there will be significant impacts and we have concerns about that and the draft also recognizes that there will be exposure to sensitive receptors, PM 10 and PM 2.5, and that they are significant. So those two elements are are something want to look to and we have concerns and it’s not acceptable that we see a plan that is assuming that PM 10 and PM 2.5 are going to be elevated to sensitive receptors. We want to address this before we move forward. We look forward to working with staff on that. Thank you.</td>
<td>One of the Implementation Actions listed in Appendix B is a Regional Fare Impact Study. This study will ensure public stakeholders get the chance to weigh in on the options. The study, expected to be completed by FY 2024, will include an evaluation of fare subsidies for people with low-incomes, seniors, students, and youth. While that work is underway, staff from SANDAG, MTS, and NCTD are working with stakeholders on a one-year pilot that may provide free fares for youth age 18 and under. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG’s housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, transit agencies, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.</td>
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<td>M169</td>
<td>Carolina Martinez</td>
<td>Environmental Health Coalition</td>
<td>Good morning, I am Carolina Martinez with the Environmental Health Coalition and the San Diego Transportation Equity Working Group. I am here to commend SANDAG for a Regional Plan that has been proactive at including environmental justice communities. I am also here to ask that SANDAG elevate its role in support of jurisdictions in the making of a more affordable housing. We know that the planet is burning and our current transportation heavily contributes to the fire, damaging our lungs and failing the low-income communities of color who depend on it the most. Overall, 95% of San Diego’s low-income residents do not have access to fast and frequent transit. The proposed Regional Plan provides critical lifelines to change that. We commend SANDAG for the proposed final Plan changes which include more frequency, 24-hour service, a Blue-line express trolley, bathrooms, a Purple line that serves City Heights, a system that is able to evacuate people to safety during an emergency, free transit by 2030 but we still need free transit for youth 24 and under now. The Plan includes critical lifelines but we cannot ignore the housing. We cannot continue to ignore housing while planning for transit. While anti-displacement study and the housing incentive program are set forward, the current emergency calls for all government to lead with an emergency response solution. We request that the Regional Plan include more proactive mechanisms to guarantee that communities of color won't be displaced as a result of transit improvements. For example, the need to build all necessary public infrastructure to alleviate costs for developers so they can build more affordable housing. We can no longer displace the housing responsibility solely to the jurisdictions. Every government agency needs to integrate –(cut for time).</td>
<td>This comment is responded to in the Final EIR. Please see Comment 21 in Appendix P to the Final EIR.</td>
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<td>M170</td>
<td>Craig Jones</td>
<td>Alliance for Regional Solutions</td>
<td>Hi, thank you! I actually have some questions for clarification, I assume for Mr. Grier. First on the GHG analysis, my question is; are those analysis of project impacts and production of GHG, are the GHG levels from all sectors of the San Diego region, not just transportation, but for energy. Are those analyzed levels of GHG production, from all sectors? That’s my first question. My second question would be, in light of the environmentally superior of alternative three in the EIR, what would be the reasons not to go for adoption of alternative three? Hopefully we can get some clarification on this. Thank you.</td>
<td>This comment is responded to in the Final EIR. Please see Comment 32 in Appendix P to the Final EIR.</td>
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<td>M171</td>
<td>Craig Jones</td>
<td>Alliance for Regional Solutions</td>
<td>Thank you very much I appreciate it. My name is Craig Jones, I am a representative to the Social Equity Working Group and representing an Alliance for Regional Solutions which represents interest in North County. I appreciate the presentation this morning. It appears that the changes to the draft Regional Transportation Plan are positive. They’ll advance our efforts to address climate change and they will be good for equity. I really appreciate that. I have been following the media coverage in the last couple of days. I’ve got a message for Supervisor Jim Desmond, Jim, if we build this system for this Plan, yes people will use it. They will use public transit more because the system will work and compete with the private car, making it desirable for people to do this. Regarding the vehicle mileage charge, this will replace the current gas tax. Gas taxes which are a per mile that we pay now will phase out. We will need to replace the gas tax, that is what the vehicle mileage tax will do. Again, this is an issue of equity for drivers of electric cars like myself. If we don’t have a mileage charge, then we won’t be paying our fair share. This is way of ensuring</td>
<td>We appreciate your support and feedback. SANDAG is working on designating pilot programs and near-term projects to begin implementing some of the elements outlined in the proposed final 2021 Regional Plan. Please continue to follow along in this process by visiting SDForward.com.</td>
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### Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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<td>M172</td>
<td>David Alvarez</td>
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<td>Thank you and thank you everybody for the opportunity to share our thoughts. In the 1950’s a major board of transportation entered into a major freeway plan for San Diego. The plan is the 52 highway and we have the data to show. I propose requesting that SANDAG reconnect Logan or a freeway lid or cap as part of one of the priority projects in order to undo some of the impacts that greenhouses have and to increase opportunities to youth. I am glad that there is a lot of space protected in the plan, but there are communities like this one where they don’t have access to parks and they don’t have that type of amenities and they need. I want to ask if someone could give us clarification from SANDAG staff. Page 277 is where my letter request for this is and the response from SANDAG is not very clear whether our proposal makes it into this plan. I would appreciate that. Thank you so much.</td>
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<td>M173</td>
<td>David Guerrero</td>
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<td>Good morning SANDAG. My name is David Guerrero. I have lived in City Heights since October 1981. I have loved this area and I have seen this area change in many ways sometimes in positive ways and in not many positive ways too. But I truly believe in the positive change happening in City Heights and we need more. First, I would like to thank SANDAG for the Regional Plan. We need a bold plan for the future of San Diego and including projects like the Purple line. It would make a huge impact for City Heights and for connecting the region. One of the downsides of City Heights is seeing so many have been displaced, end up homeless, and out of work. Displacement makes people have to travel farther to work, medical appointments and errands. That is why I believe that the Mid-City corridor plan will be a huge benefit for the transit dependent communities like City Heights residents as well as tourists coming to City Heights and Little Saigon. I want to thank you for including the anti-displacement study and incentive program in the original plan. I cannot emphasize how important it is for San Diegos and its communities to get the support they need going forward. Thank you again.</td>
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<td>M174</td>
<td>Deborah Knight</td>
<td>Friends of Rose Canyon</td>
<td>Hi, my name is Deborah Knight. I am the Executive Director of Friends of Rose Canyon, which works to preserve the the Rose Creek Watershed- the main fresh water tributary of Mission Bay. That water body includes Marian Bear Park. My letter included an MSCP that specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including Friends of Rose Canyon, the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Creek will be a key component of these planning efforts.</td>
<td>SANDAG appreciates and agrees with the concerns of any potential impacts to our region’s parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including Friends of Rose Canyon, the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Creek will be a key component of these planning efforts.</td>
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<td>M175</td>
<td>Deborah Knight</td>
<td>Friends of Rose Canyon</td>
<td>Good morning my name is Deborah Knight. I am the Executive Director of Friends of Rose Canyon which is part of the Save Marian Bear Park Coalition. I urge the Board today to act to save Marian Bear Park. Marian Bear extends for 3 miles along the south side of the 52 between the 5 and 805. It is one of the City of San Diego’s oldest open space parks. Its trails provide an escape to nature for urban residents of all ages. It is also part of the city’s MSCP. The Regional Plan proposes to add 3 additional highway lanes to the 52, right next to Marian Bear Park plus multiple new highway connectors in all directions to and from the 5 and 805. Please remove these today from the draft Regional Plan. SANDAG staff has told us to not worry, that they will try to use existing footprint to add this massive amount of new highway in these 3 miles. That is not the point. The point is three more miles of traffic and air pollution along the edge of an open space park.</td>
<td>SANDAG appreciates and agrees with the concerns of any potential impacts to our region’s parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including Friends of Rose Canyon, the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Creek will be a key component of these planning efforts.</td>
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<td>M176</td>
<td>Donald Beyer</td>
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<td>Good Morning. Right now, we have a ridership of about three percent of our population on mass transit and a big question is how much ridership is expected after these 168 billion dollars is spent. The other point I’m going to make is with cost overruns there are always cost overruns, especially when we’re talking about government agencies, and is that calculated into these costs?</td>
<td>The 2021 Regional Plan used comprehensive data analytics to establish where people live, where they work, and what activity centers they were traveling to. Based on this analysis, new routes and modes of transportation were developed. Trunk line transit is connected to Mobility Hubs and Flexible Fleets that provide the first and last mile access that has previously been missing. Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.</td>
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<td>M177</td>
<td>Dorothy Martin</td>
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<td>Good morning Chair and members. I am from Vista, my name is Dorothy Martin and I am glad for this opportunity for public comment. I am new to your public meetings and very nervous right now so I will try to make it short and sweet. I did submit a letter via email and I’ve submitted my comments to my Mayor, Judy Ritter. I’d like to say I agree with the goal of clean air. I think that is something we can all agree on. I have lived in LA in the 60s and it was not too clean back then. San Diego was a good destination because of the clean air so I think we have something to be thankful for in San Diego County. Even LA is seeing a lot of good progress in that area of clean air. I want to go on to oppose the vehicle mileage tax for various reasons. One, I feel that it is taking a lot of revenue from North County and applying it to projects in other parts of the county that we don’t see a direct benefit. I think that’s kind of taxation without representation and also there is a lack of accountability there because we don’t see where our money is going. Secondly, I feel that it is an invasion of privacy. An earlier comment as talking about this. There are some privacy concerns there that is very different to resolve because of cyber security. Thirdly, I feel that it would punish me for example, as a driver of a personal vehicle for my business, personal, and recreational use of those vehicles. I think that is something that infringes on my freedom. Fourthly, -(cut for time).</td>
<td>The 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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Hi good morning everyone, my name is Elizabeth Chavez. I have been living in Barrio Logan for about 11 years. Thank you for including some of the transit lifelines. I am in support of the Regional Plan. I have been a commuter myself since high school. I heavily rely on public transportation for work, school, volunteering and so much more. Most of the places that I do need to go are more than half and hour so having those bathrooms stops will help ease that stress. However I am still concerned about the folks in the community possibly being displaced within their own homes. I have seen families and friends who had a hard time finding those affordable housing and then ended up moving far away from their own homes. I would like to thank you again for the anti-displacement study and the incentive program. Unfortunately there is still more work to be done. Please commit to building the infrastructure so developers can build affordable housing. Thank you.

The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG’s housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity, and addresses gentrification, displacement, and other issues. One of the plan’s near-term priority implementation actions includes a Regionwide Displacement Study (Appendix B) in order to ensure our housing efforts do not lead to the displacement of current low-income residents in communities where housing growth occurs.

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Draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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| M181 | Frank Landis | California Native Plant Society | My name is Frank Landis and I'm the conservation chair for the San Diego chapter of the California Native Plant Society. I want to thank the Board and the staff on trying to get this plan together because as everybody knows it's a horribly complicated mess to try and solve. I wanted to make a couple of comments. One is just to put this in context for why it's so important to have fully funded conservation plan. As I think we all know if we have been paying attention to the COP26 or IPCC or all these other global efforts, conservations and the extinction crisis and global warming are two ends of the same problem. So you're trying to balance the solution for one on the back of the other, they both fail. We are stuck with a horribly complicated problem and we're trying to solve it for future generations. In San Diego, as far as anybody knows we are the most biodiverse county in the United States. That means we've got 1700 plants in an area about the size of the big island of Hawaii and that is about twice as many plants as in Hawaii. But we've also got 3.3 million people which is 19 times more people than the big island of Hawaii. I am picking on Hawaii in particular because Hawaii is currently the extinction capital of the United States. We really don't want to replace them but when you pack that many people in that small space with that many species, it gets really complicated to solve the problems.

One example of how complicated it is, Marian Bear Park issue where you're trying to cram a transportation corridor in next to a wildlife corridor. It also points out that if you expand one you cut the other. So we really have to balance both of those. I want to point out I used to do environmental science and 30 years ago I was talking about climate change at the symposium. We are decades behind. I thought when I was an undergrad everything would be solved by now, but we really have to work. Thank you. | We appreciate your support of habitat conservation efforts in the region. SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the California Native Plant Society, City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts. |
| M182 | Gretchen Newsom | IBW 596 | Hi, Gretchen Newsom on behalf of IBW 569 and our 3600 union power professionals and electricians. As we have said many times before your Board. We must change our path to preserve the future and quality of life for generations to come. Which is why we are so very pleased to see the 5 Big Moves introduced and now pleased to see a new bold regional transportation developed in alignment with those values. We now have a real plan to expand transit, make more efficient use of our highway system and meet San Diego's climate goals. These smart investments will also create thousands of local jobs and ensure a better quality of life for all. As the Plan outlines, now is the time to make strong, immediate investments in transit like railline build outs and the increase of transit frequency all while expanding our network of mass transit opportunities including those youth opportunity passes. We are pleased to see that the Plan has gotten better and better. We stand united with our partners in urging you to implement strong and immediate investments in transit, climate action, job creation, and lifeline community connections. Thank you. | We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com. |
| M183 | Gustavo Dallarda | Caltrans | Thank you, Mayor Gloria. So the Department of Transportation, we sent a four page letter in response to the RTP. You can see it in attachment one, on page 945, so I won't go through all of it. I'll just mention briefly that we support this plan. This plan is in alignment with state goals and we've been working together collaboratively with SANDAG staff on the development of this plan for the last couple of years so I want to thank Ray and Coleen and the rest of the SANDAG staff for taking our input during that time and incorporating that input as part of the plan. I wanted to | We appreciate the collaboration and partnership with Caltrans throughout the development of the 2021 Regional Plan. |
I had a lot I want to say but I've been just crossing things out because I want to have respect for network we may have to convert some general purpose lanes into managed lanes. Now for that, corridors portions. We are fully aware that in some areas even to complete the managed lane are fully on board with the plan put forward, particularly for The 5 Big Moves and the complete to have to be studied further in environmental documents pursuant to CEQA and NEPA but we are included in the original plan so in the cost of the projects of the shoulder conversions those costs are already addressed in there obviously the details are for each individual project are going to have to be studied further in environmental documents pursuant to CEQA and NEPA but we are fully on board with the plan put forward, particularly for The 5 Big Moves and the complete corridors portions. We are fully aware that in some areas even to complete the managed lane network we may have to convert some general purpose lanes into managed lanes. Now for that, we will require legislation and we will work through those details in the thank you.

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<td>M184</td>
<td>Hon. Councilmember Christopher Rodriguez</td>
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<td>I had a lot I want to say but I've been just crossing things out because I want to have respect for time so I'll quickly try to summarize my comments. So the city of Oceanside is extremely concerned with the proposed plan and the draft EIR’s failure to identify funding for two desperately needed regional transportation projects. Number one is the I-5 HOV lanes from the 78 to Vandegrif identified and labeled as I-5 HOV lanes and number two the I-5 and SR 78 interchange. I’ll start with the I-5 HOV lanes from the 78 to Vandegrift. The draft EIR states that the proposed I-5 HOV lanes project will be implemented by year 2025 however date SANDAG has yet to allocate funding or support on this major freeway improvement project’s design. It is imperative that the proposed project not only remain on the proposed plans list of projects but also receive adequate funding and commitment from SANDAG to bring the project to fruition especially, if the draft EIR analysis relies on it. With the year 2025 nearly three years away it is unrealistic and disingenuous for SANDAG to continue stating that the project will be delivered on time. The next most important project here in North County - I-5 and the SR 78 interchange, the proposed interchange project would establish a much needed connection between the west and east side of I-5 at the SR 78 interchange under existing conditions there is no safe access for bicyclists and pedestrians across I-5 in this area similar to the I-5 and for the I-5 HOV lanes project the draft EIR identifies and relies on the this projects for the EIR however SANDAG has not formally appropriated the funding needed to implement it by 2025. My staff reiterated these comments from the city to SANDAG and I know you’re going to respond to those by November 30th so I don’t need a response necessarily right now. I do want to make brief comments because there’s a lot of comments and a lot of themes surrounding equity and the environment and that’s something that I’m very passionate about and so what I what I’d like to start out by saying is climate change calls for adaptation and balance, not panic and fear. What I mean by that is - let me go over some data and facts and I would love to sit down with some of my colleagues or the public in a productive conversation. During the 30 years that countries have been setting GHG emission reduction targets, global emissions have risen by 60 percent. More recently from 2009 to 2019 emissions rose from 29.7 billion tons to 34.2 billion tons, a 15 increase. During the more recent period the countries of the organization for economic cooperation development the OECD reduced their emissions however non-OECD emissions grew by almost 10 times the reduction in emissions achieved by the OECD countries. So pretty much there are countries that are not participating on efforts to counter global warming and those regions now produce 65 of the world’s emissions. The United States with less than 15% of global emissions, because it’s a global problem ladies and gentlemen, is a bystander at best, while China accounts for 30 percent. The mistake that many make is to simply say that they don’t believe global warming is happening. The overwhelming scientific research</td>
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<td>Responses to comments submitted by the City of Oceanside are included in the 10/29/2021 Board report, item 3, Attachment 1, pages 16-16-20. The Build NCC I-5 HOV lane project is being constructed from south to north and includes the northern segment (to Harbor/Vandegrif) as part of its project level environmental analysis. While funding has not yet been identified or programmed, SANDAG continues to pursue funding for implementation of this project consistent with the proposed Regional Plan. The interchange improvements, including managed lane connectors, between SR 78 and I-5 are included in the 2035 phase of the Regional Plan. The 2021 Regional Plan must meet all federal and state mandates, including the SB 375 regional greenhouse gas (GHG) reduction target set by the state and federal air quality conformity requirements. The City of Oceanside’s comment on the Draft EIR is responded to in the Final EIR.</td>
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<td>M185</td>
<td>Hon. Garry Bonelli, Commissioner</td>
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<td>confirms that global warming is in fact happening. Climate scientists are just not sure to what extent and estimates and opinions vary widely because of this uncertainty. So to me and to many of the constituents I represent, spending billions of dollars locally to over mitigate a problem that we’re merely a bystander on doesn’t make sense. At the expense of our region, California is a prime example of short-sighted and unrealistic policy decisions in all major areas of society from public safety, quality of life, housing allocation, schools, business, labor, transportation, and the environment, the policies are all geared toward bigger government, massive spending, massive taxation to fund special interest elites at the expense of hard-working Californians. I want to end with one last item a report most climate change activists do not understand the impossibility of achieving a net zero due to current technologies and limited supplies of green exotic minerals and metals even if it was worth trying to do so I encourage them to review the paper by Cambridge University emeritus professor of technology Michael Kelly which shows that replacing just the United Kingdom’s 32 million light duty vehicles of the 1.42 billion cars in operation worldwide with next generation EVs would require incredibly vast quantities of materials that do not exist today. Thank you.</td>
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<td>The TransNet measure approved by San Diego County voters in 2004 focused on congestion relief and included a set of transportation improvements, many of which have been completed. Some of the remaining projects in the TransNet measure are not likely to be constructed due to three primary factors: 1) changes in regional needs 2) changes in state law and 3) technology advancements that would suggest a different transportation solution. The changes in regional needs are the result of slower population growth than anticipated and a change in anticipated land use pattern to a more focused development pattern with new growth occurring within existing urbanized areas. State laws have changed from requiring congestion relief (usually solved in the short term by widening roadways) to reducing vehicle miles traveled and greenhouse gas emissions (usually solved by people living closer to destinations and using alternative modes of transportation such as walking, biking, carpooling and taking public transit). Advancements in technology provide new solutions such as the use of shared electric vehicles and system improvements to signals and dynamic traffic lane assignments that make better use of existing transportation infrastructure.</td>
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Speaking on behalf of the Port of San Diego and the Regional Plan we’re very supportive of the Harbor Drive 2.0. It’s a great example of a multimodal corridor that will benefit not only people movement, but goods movement and really help out the communities of Barrio Logan, National City, Chula Vista, and the South Bay. Also we’re very supportive of the goods movement to keep the rail line open, to get it into a tunnel to get more efficiency out of the North-South rail line and that’s from the Port’s perspective. From my personal perspective, having a little bit of history here with SANDAG and as a member of your Transportation Committee listening to my fellow Board members out there we know that trying to create a plan in a dynamic, complex living environment in sort of a politically charged era, it’s very difficult. The point that Mayor Salas makes about change in entrepreneurship and innovation, keep in mind by the year 2050, 30 years from now half the people working out there in their jobs, they’ll be working in jobs that don’t exist today. It just shows the rapidity of change - how quickly we’re changing. I salute SANDAG and their plan for the outstanding work they’ve done on the equity front and sustainability. They’ve been very, very transparent. Hasan’s been brutally honest about the costs and what this plan will cost however, when it gets right down to it most residents want less traffic congestion. Yes, they’re worried about the reality of climate change, sea level rise, but they’re looking at less traffic congestion. When I participated in the public workshops I heard a lot of different comments and then you asked posed two questions and the questions are what do you like most about the plan and what do you like least about the plan. I like that it’s a plan, if I read the tea leaves right, you’re going to have the votes to move this plan flowing forward and it’s going to keep federal and state dollars flowing into our region - that’s important. What I like least about the plan it’s too slow to implement and way, way too costly. And I have all the respect in the world to SANDAG staff having been part of that organization for a number of years, however we’re listening to the strongest voices on the Regional Plan people that are bicycling and walking, jobs, environmental advocates and God love them for their passion and being involved in the plan. Just to point out to our fellow directors we’ve come full circle. Back in 1975 a visionary like Hasan, a guy by the name of Dick Huff, the first Executive Director of SANDAG came up with a plan. A heavy rail plan matrix throughout the County people said a heavy rail plan it’s going to cost several billion dollars and didn’t support it. How can that be - ridiculous way ahead of his time. But then that the 13 cities and the County that comprised SANDAG refused to modify the land use policies and that several billion-dollar heavy matrix rail system went down the drain and this was even before Peter Calthrop came up with the phrase of transit-oriented development. Yes, SANDAG has delivered hundreds maybe thousands of projects, programs, and services however, during the ensuing 45 years and many subsequent RTPs and billions of dollars spent...
First I want to give recognition to all the public members who have made comments and I want to give at least my appreciation for participating in this long process. I also want to make note that this RTP is two years behind schedule but this RTP is different from previous ones it’s made a significant change in direction and I applaud Hassan and staff for making this change. Going this new direction is I think very significant and important for so many of us in our community and for our future. 

To make this short I want to ask some quick questions of Ray Major and Coleen and you could keep your answers short if you can. One is who’s been paying for our roads in the past and currently are we fully paying for our roads and maybe you have some quick answers for us. Right so this was under the belief that users should pay their way correct, but when did that stop happening in terms of paying its own way. Correct and what one of our main thrusts of this board is to try to address equity. So is that equitable if people that have more fuel-efficient cars or electric cars are not paying as much as those who are paying driving less fuel-efficient cars? Correct so would you say a road usage fee would be more equitable and actually help poor people more than our current system? Correct so that was actually my second question we don’t need to go into the methodologies but there are ways to adjust for people who are very poor to have to drive and lastly there’s a lot of talk of VMT reduction this plan uses various mechanisms including road use fee as well as high occupancy lanes to reduce vehicle miles traveled so Coleen would do the state that’s asking us to reduce vehicle miles traveled per capita correct? How much do we have to reduce? A response to these comments was provided at the 10/29/2021 Board Meeting. The gas tax does not fully pay for our infrastructure needs. Overtime, as we move towards a more fuel efficient electric fleet, we need to find a replacement to the gas tax to maintain roads and invest in new projects. Under the current system with the gas tax, people who are driving more fuel-efficient cars pay less than those who have less fuel-efficient cars. This can be a social equity issue because people who earn lower incomes typically drive less fuel efficient, older model cars. With a road usage charge, these inequities can be overcome by designing the program with adjustments based on income. 

The 2021 Regional Plan is required to reduce greenhouse gas (GHG) emissions from passenger vehicles and light-duty trucks by 19% per capita by 2035 compared to 2005 levels, as mandated by Senate Bill (SB) 375. The SB 375 reduction target must be achieved by reducing per capita VMT. Meeting the 19% target will be accomplished through a variety of strategies including land use. The Regional Plan includes an SCS land use pattern that focuses future growth in the mobility hub areas with the goal to get people closer to destinations so that trips are shorter and closer to mobility options such as public transit and flexible fleets.
San Diego Forward: The 2021 Regional Plan

draft 2021 Regional Plan Responses to Comments Received August 7 to November 24, 2021

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<td>M187</td>
<td>Hon. Lesa Heeber, Mayor</td>
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<td>I'm really supportive of what I'm hearing a plan that looks forward and most importantly considers the threats that we face from climate change. It's an indisputable fact that fossil fuels are the largest contributors to this threat in our region and to me it's the rationale for thinking differently about our transportation choices so I commend this. I recognize that not everyone is used transit and I mean even in New York City I think it's just 56% of the population uses it so I do have a couple of questions. What is the mode share now and anticipated to be in 2035 and 2045, in the peak and off-peak? If you could also remind us of the greenhouse gas savings with this plan versus doing nothing versus business as usual. Also just to clarify, the road user charge as Mayor Salas was mentioning, will the board have the ability to adjust who is and is not charged depending on equity issues and other considerations that we might have. A response to these comments was provided at the 10/29/2021 Board Meeting. Analysis of GHG reduction and mode share for all trips, including comparisons to a “No Build” scenario, can be found in the Regional Plan performance measure results in Appendix T, Attachment 6. Equity is at the forefront of everything we are doing. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. This board will have a chance to set the policy on how we want to move forward with any road user charge.</td>
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<td>M188</td>
<td>Hon. Mary Salas, Mayor</td>
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<td>Thank you very much and thank you to the staff that has worked so hard on developing this plan so far thank you to all the public that weighed in on this discussion during the different meetings that we’ve had and also through written communications it’s really important for us to hear all those concerns and ideas and suggestions and what I wanted to say is you know this is a bold look at the future and it’s a blueprint for the future and that we have to understand that infrastructure and projects take years and years and develop during the time that that’s taking to develop there’s technologies that are going to develop in ways that we can’t even understand right now that will allow us to implement all these different ideas that are incorporated in in the plan right. So a lot of the concerns about tracking how are you going to do this how are you going to keep track of this I think that you know the technology will evolve that that we’ll get answers as this plan goes forward. I think that it’s imperative that we support this vision you know I have grandchildren I worry about their future I can see the world that how it’s changed here the climate regionally in San Diego and we can see it going on all around us from you know the polar ice caps melting just the future doesn’t look good unless we get a handle on climate right and we have to act as expeditiously as possible and all of that means a lot of sacrifice and a lot of change in the way that we do things, a lot of change in the way that we think. But we have to do it and we have to do it for the future of our humanity. We have to do it for the future of our economy going forward and so yeah there’s going to be a lot of changes within this plan that right now seem like another world. But we can go back a hundred years and look at the way that we’re doing things now and you know who would have thought that, you know when they were writing futuristic novels that we would even surpass the ideas, ideas that were presented then. But I do have a concern, and the concern is for the working people that will have to use freeways in in the future and I hope that when we’re developing these plans it’s not just going to be the region of San Diego but it’s going to be statewide, it’s going to be nationwide, that we take a look at the haves and have nots and actually the growing middle class that is becoming rapidly the have-nots and think about the people that can buy electric automobiles, the people that can install solar in their homes, they’re people with expendable income. We look at the working class people and they’re not the ones that can afford the branded cars and they’re even making choices today you know whether to choose a new electric vehicle or you know conventional fossil fuel driven vehicle and you know the difference in the price point is pretty significant so I hope that going forward that not only are we looking at the plans and how they have to evolve nationwide, statewide, but what the state can do to make sure that there’s some kind of program where we can encourage...</td>
<td>A response to these comments was provided at the 10/29/2021 Board Meeting. States like California and other jurisdictions have implemented their own sales and gas tax measures to try and address the maintenance and operation of road networks. However, as vehicles’ fuel efficiency continues to improve, and fossil fuels consumption is phased-out with electric vehicles, a new tax model will be necessary for the ongoing maintenance and operation of our road and highway networks. The revenues necessary for the ongoing maintenance will still need to be collected. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. This board will have a chance to set the policy on how we want to move forward with any road user charge.</td>
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people to make those choices about moving to electric vehicles. I fully support this plan. I know it's a huge change for people and the people that are concerned about the user tax, you know we’re paying for that right now and gas taxes are diminishing and there has to be a way to pay for the roads in the future and so this is what tries to answer right now so those are just my comments. Staff you've worked so hard on this plan it's been a long journey getting to this point and we need to move forward. Thank you.

The 2021 Regional Plan maximizes our existing roads using technology to manage how lanes are used which reduces traffic congestion and delay. The proposed network of managed lanes also encourages carpooling, vanpooling and taking transit which creates more roadway capacity without adding additional lanes. With respect to shoulder conversion, implementation would require close collaboration with state and federal agencies and possibly legislation. SANDAG has been meeting with Caltrans to discuss the approach to managed lane construction in the proposed 2021 Regional Plan.

The 2021 Regional Plan must meet all federal and state mandates, including the SB 375 regional greenhouse gas (GHG) reduction target set by the state and federal air quality conformity requirements. Underlying assumptions are determined based on many factors: ability to meet state and federal requirements, including Title VI and environmental justice considerations, best available research and best practices used by other regional agencies, results of model sensitivity tests (which show the impact of different strategies on variables such as VMT), and alignment with phasing of projects and revenues.

The regional road user charge in draft Regional Plan was assumed to be $0.02/mile beginning in 2026; however, in the proposed final 2021 Regional Plan, the state and regional road user charge are planned to begin in 2030. This is a reasonable assumption for the 2021 Regional Plan based on literature and assumptions made by other regional agencies in their regional transportation plans; the impact on ability to reduce GHG emissions and air pollution, and the potential for additional revenues. It is important to note that federal and state governments require the 2021 Regional Plan to include a financial plan that contains cost estimates and revenue sources that are reasonably expected to be available. Please see Appendices U and V in the proposed 2021 Regional Plan for more information about cost estimation and revenue assumptions.

The assumptions made in the 2021 Regional Plan should be considered a starting point for future study. Prior to implementing a road user charge, SANDAG would complete more detailed and realistic analysis, perform an equity analysis, closely coordinate with the state and regional partners on similar efforts, evaluate technology options, and prepare a pricing implementation strategy that considers all pricing elements identified in the 2021 Regional Plan.

Responses to the City of Carlsbad's letter are included Attachment 7E to Appendix G of the proposed 2021 Regional Plan.
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<td>M190</td>
<td>Hon. Mayor Alejandra Sotelo-Solis</td>
<td>City of San Diego</td>
<td>Okay thank you again chair now for the opportunity to speak my comments are “companeros”. This the time for change. This our vision to help our future, really create a more healthy, a cleaner, more united and connected region. We have to have vision and that’s why we were elected in that in these roles. In February 2019 we had the conversations of what we envisioned as a region to make all those things happen. Is it going to cost money? Damn right it is! But it’s that investment, we put our money where our mouth is, it make it happen because it matters to us. It matters to have that connectivity, it matters to mother earth that we lower our greenhouse gas emissions. So from the community charettes that I know each one of us has pushed whether it be virtual attending events you know at the various community spaces and creating bilingual, multilingual spaces the community has provided that input. We are very close to creating a plan that we can be proud of but also to leave a legacy for the future generations we can’t say we want some things but we can’t do this we like this but we don’t want this because it should be about how do we get to that yes because ultimately the technology will meet those needs. We don’t know everything, true, but we have to think visionary and this RTP is worth doing and worth doing right. I want to thank staff again for helping to really capture all of the ideas from 1000s of people that submitted comments online on the RTP in writing but also too through those community charettes, as well. And thanks for the community for being consistent in the messaging to create accessible mass transit. Is everybody gonna hop on a bus tomorrow – no but we’re gonna make it a lot sexier, a lot smoother, a lot faster and more convenient so that it can be that option the better option and again the goal is by 2030 we make it free for everyone lastly I just want to say that as data driven decision makers with this 2021 RTP which will sunset in 2050 so we have quite some time to see it in its lifetime. We want and we said we wanted outcomes that are still works in progress because we’re still getting the detail done but we want outcomes that we can point to that is measurable because we each have our climate action plans that we have to achieve we also have you know the equity lens that really takes into account those communities that have been disadvantaged when it’s come to mass transit as well as freeways coming through the neighborhoods so this really is an opportunity to make a difference to be bold to be strong and I can’t wait till we have the continued conversation of December. Thank you chair.</td>
<td>The 2021 Regional Plan has been developed with equity at the forefront. A better transit system is a fundamental component of this Regional Plan and SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. We appreciate your support and feedback.</td>
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| M191 | Hon. Mayor Todd Gloria | City of San Diego | I see other members of the Board seeking recognition I just want to conclude with expressing my appreciation to staff as well as the members of the public who joined us today. This a massive undertaking. It’s taken a couple years now as you saw from the timeline that was in the staff report and we’re not done yet. Obviously we’ll have the opportunity to continue to discuss this matter through December when this Board will be asked to make a decision. I believe today’s conversation will help advance making that decision in part because we’re able to spend a fair amount of time discussing important issues, educating the public and fellow board members and I look forward to that conversation. I will just note that this plan presents a grand vision with some extremely large moves and we’re changing the way that we’ve done things in the past. Big changes are understandably difficult and they certainly will have opponents, but I for one am committed to this vision. It is necessary for the protection of our economy, our environment, and our climate. And while there may be details that we’ll have to continue to work on, specifically I would like staff to respond in writing | SANDAG staff responded to the letter from Councilmember LaCava regarding SR 52. In the proposed final 2021 Regional Plan, the road usage charge would begin in 2030 to align with efforts at the state and other regions. We understand there are concerns around the privacy and implementation of a road usage charge. Significant additional work, including public involvement, pilot testing, legislation and much more will be necessary to inform implementation of elements of this plan, including the road usage charge. SANDAG will continue to collaborate with other regions, the state, and federal government that are evaluating options for a road usage charge. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system. |
First, I want to take this opportunity who thank staff for the tremendous amount of work that has gone into the Regional Plan but also many community members who took time out to participate in this process, your input is invaluable and also each and every board member who has been along every step of the way in this journey the one thing that I can say is that I’m really excited to hear about the changes described by staff and excited because this is exactly the direction we asked staff to go in as a member of the audit committee I value transparency which has been the focal point in SANDAG’s development of the Regional Plan now we know that state has published the raw data, worked closely with the audit committee and staff and work to get public input from people that live in all parts of the county. In fact early on I attended the East County regional in-person meeting to hear the candid conversations that came forward from the community and in May of this year welcomed the public to the East County virtual meeting and introduced the draft plan for the community to give input also prioritizing equality in the Regional Plan and including free transit is setting the stage for the region we all contributed to this plan and I think that it reflects what the region wants and this is what I want my two daughters and their friends to inherit.

Lastly a renewed commitment on flexible fleet pilots projects and learning and learning on technology and the private sector will help the Regional Plan deliver projects better and faster as the Regional Plan moves forward I would like to ask staff to work with me and my team to get a pilot project in my city that would be the city of Lemon Grove so I consider that as we move and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources.

The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share.
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<td>M193</td>
<td>Hon. Rebecca Jones, Mayor</td>
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<td>forward now we all know that this work was not easy but I am confident we will not let fear steer us away from making good decisions. So let's move forward with the plans and again I’d like to say thank you to everyone involved.</td>
<td>A response to these comments was provided at the 10/28/2021 Board Meeting. The Regional Plan considers the current and future needs of the whole region, including communities in north county and east county. The reimagined transportation system offers benefits that extend throughout the region as residents and visitors travel outside their communities for work, recreation, school, entertainment, and accessing basic needs. Appendix A describes the proposed projects organized by corridor area, including the following corridors that serve north county and east county communities: North County, San Vicente, I-5 North Coast, I-15, I-8, SR-94, SR 125, and Coast, Canyons, and Trails. In the proposed final Regional Plan, corridor-level maps have been added to better communicate the proposed projects in each area. In addition, the investments in Next OS, Flexible Fleets, Mobility Hubs, and programs are presented as regional investments and SANDAG intends to work collaboratively with each jurisdiction to implement the Regional Plan and customize mobility solutions for the unique needs of each community. The regional road user charge in the draft Regional Plan was assumed to be $0.02/mile beginning in 2026, however, in the proposed final 2021 Regional Plan, the state and regional road user charge are planned to begin in 2030. This is a reasonable assumption for the 2021 Regional Plan based on literature and assumptions made by other regional agencies in their regional transportation plans, the impact on ability to reduce GHG emissions and air pollution, and the potential for additional revenues. It is important to note that federal and state governments require the 2021 Regional Plan to include a financial plan that contains estimates of costs and revenue sources that are reasonably expected to be available. Please see Appendices U and V of the proposed final 2021 Regional Plan for details about cost estimation and revenue assumptions for the Plan.</td>
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<td>M194</td>
<td>Hon. Steve Vaus, Mayor</td>
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<td>You know there’s been a sense for quite a while that SANDAG wants to make driving so pricey and painful that folks are forced out of their cars whether gas or electric and onto public transit now comes the promise of free transit paid for with a mileage tax a tax which is going to increase everybody’s cost of living regardless of how you drive. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms.</td>
<td>Equity is at the forefront of everything we are doing. SANDAG will not put out a plan that hurts working class San Diegans. SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and greenhouse gas emissions reduction. The initial phase of this study will focus on calculating the true cost of driving, and better understanding what sources of existing revenue are funding different parts of the system and how different populations are impacted by existing revenue mechanisms. This foundational understanding will help SANDAG to design a road usage charge program that is more fair than current transportation funding sources. The study will also assess the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more</td>
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San Diego Forward: The 2021 Regional Plan
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<td>M195</td>
<td>Hon. Terry Gaasterland, Mayor</td>
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<td>I want to really echo so much of what I’ve heard from Mayor Jones, from Mayor Salas there’s so much here for us to as a group to think through together and I want to add another element to this. The City of Del Mar submitted a 32-page detailed commentary on the draft environmental impact report for the Regional Transportation Plan. That 32-page letter has my name on it but it was put together in close consultation and analysis with our Director of Planning in the Planning Department and a few points from that letter really inform us here and I’ll give these examples. So for example, having details on the mobility hub boundaries. Is Del Mar part of this hub or is it not? To really understand the greenhouse gas impacts, what are the assumptions on emissions reductions with rail traffic? Does it include assuming the railroad transportation will double twice the number of trains? And it also assumes that tier 4 engines will be on all the trains by the year 2025. However, the RTP has no requirement for operators to convert, so we need to be careful about our assumptions and really understand the greenhouse gas accomplishments and trade-offs and details on that are in our commentary. Third point, incompleteness in any study impact, really understanding whether something is feasible. Small example, both of Del Mar’s lagoons are missing entirely from the draft EIR that’s the San Dieguito lagoon and the Peninsula’s lagoon. Also missing are things like Del Mar’s bluff overlay zone that protects the bluffs and the lagoon sea level rise adaptation plan, our land conservation ordinance, and since I know those are missing from Del Mar and have not informed the EIR which means we don’t have a complete analysis of greenhouse gas emissions reductions. What about other cities, do other cities have important policies that haven’t been included in this? And then I’d like to draw attention to the Del Mar tunnel which is missing from the draft EIR it’s not there in the geology and soils, the air quality, the land use, the project description, the biological resources, the noise, the greenhouse gas, we have a shoreline protection act line, we have an ICP that’s certified by the Coastal Commission and those aren’t yet in the draft EIR, so I want to draw attention to that because in this RTP there is a lot here that is good, it really steps back and asks the questions what do each of us need and what do we need together. Listening to Mayor Jones I’d like to really emphasize that we need to ask about each region and interconnecting the different regions. We’re a community but we’re a community of communities, so we also need to ask why do we need it, and then once we’ve understood need, what do we want, and then how do we pay for it. So I want to say a little something about how to pay. Coming from a computer science background and coming from a biomedical background I know that it’s possible to do double-blinded identifiers and to track entities where an entity is a car and with really clever AI algorithms (and yes, my background’s AI), we can without identifying individuals and by looking at aggregate behaviors have suggestions for personalized driving plans. These are underway, these are in research and it can be done in a way that doesn’t violate privacy. So for example, electric vehicle cars, we can track for a given car where is it charged, is it local or is it not local, and given the locale how many charges, and then you extrapolate numbers of miles traveled from charges. However, we have to remember that sometimes if you drive a little further you may get there faster so we need to think hard about a blanket four cent a mile tax on vehicle miles traveled and think differently about how to replace the declining gas taxes. I would encourage that this regional transportation plan be crystal clear that as revenues decline from gas taxes how do we pay for what we need and what we want together as a community and as individual communities - let’s be creative. And I want to echo what Mayor Salas says - the concern for working people who must use the roads and highways for their work and have excessive miles compared to someone who’s going to commute to and from a place of work we really have to than their fair share. This board will have a chance to set the policy on how we want to move forward with any road user charge. Any program we put in front of you will outline a process where no one will be worse off.</td>
<td>The City of Del Mar’s comment on the Draft EIR has been responded to in the Final EIR.</td>
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think about how to balance this and that's a social question so I want to put these questions out there and I'll draw your attention to our 32-page letter and please read for yourself page 30.

As mentioned by almost all commentators and standing, staff climate change is a very pressing issue that has affected all residents in San Diego. I can speak for the never-increasing exposure to gas emissions in the communities of Barrio Logan and Logan Heights, communities that besides being divided by the interstate 5 freeway in the 1950s, we're still feeling the repercussions through their exposure to gas emissions. With that being said, there are needed changes to the draft plan and for that I would like to highlight and advocate for the incorporation of Reconnect Logan into the final draft. Reconnect Logan is asking for a freeway lid over the interstate 5 freeway to connect Barrio Logan and Logan Heights in order to reduce the exposure to greenhouse gas emissions, as well as for allowing to create new parts and open spaces for the possibility of affordable housing on top of the freeway lid. Our community has been affected long enough and for that I really urge for the incorporation of Reconnect Logan to the final drafts plan. Thank you very very much.

The Coastal Rail Trail segments requested for removal from the transportation network represent 6.2 miles of regional bikeways connecting to the existing Sorrento Valley Coaster Station, as well as future Transit Leap services. These projects and this alignment were first identified in the 2000 Coastal Rail Trail Project Study Report, included in Riding to 2050: The San Diego Regional Bike Plan (2010), and identified as a priority project in the Bike Early Action Program (EAP). SANDAG will continue to work with the City to address concerns and align with local planning as these projects progress.

SANDAG appreciates and agrees with the concerns of any potential impacts to our region's parks and natural spaces including Marian Bear Memorial Park. For this reason, the proposed final 2021 Regional Plan, as you suggest, will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.

Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on the transportation system, and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the City of San Diego in its role as the state's implementing agency. SANDAG is committed to ensuring that any changes are consistent with the goals and objectives of the Regional Plan, as well as the needs and priorities of the San Diego region and its residents.
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<td>M199</td>
<td>Karen Zerk</td>
<td>Friends of Rose Creek</td>
<td>Good morning Chair Blakespear and members of the Board. My name is Dr. Karen Zerk and I am a resident of the City of San Diego and the Executive Director of the Friends of Rose Creek which is part of the Save Marian Bear Park Coalition. San Clemente Creek runs through Marian Bear Park and then into Mission Bay Park. Rose Creek is already on the 303D list for heavy metals and other pollutants. At this time I would like to request the removal of additional travel lanes and connectors on State Route 52 between Interstate 5 and 805. While staff indicates they will stay within existing right-of-way additional traffic trash and noise will negatively impact Marian Bear Park for urban residents and wildlife. Marian Bear Park has already suffered degradation and loss of habitat due to the Mid-Coast Trolley Extensions that removed oak trees that were over hundreds of years old because they were in the railroad right-of-way. Once the Blue Line opens, the noise of the Trolley will further degrade the experience of recreating at the west end of Marian Bear Park. Please remove the 3 additional lanes and new connectors to protect the habitat and other open spaces within the city of San Diego, which means that city residents who want to experience nature have to drive outside their communities to reach open space. City residents who don’t have vehicles just are shut out of recreating and open space. We need to stop degrading our MSCP lands and other open spaces within the city of San Diego, protect them for the amazing resource that they are. They provide places to cool off, get away from concrete infrastructure, give our children - (cut for time).</td>
<td>SANDAG appreciates and agrees with the concerns of any potential impacts to our region’s parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including Friends of Rose Creek, the City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.</td>
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<td>M200</td>
<td>Katie Meyer</td>
<td>San Diego 350</td>
<td>Hello, good morning Board. My name is Katie Meyer and I am with San Diego 350. I want to thank the Board and SANDAG staff for their hard work on their Regional Plan and for advancing their boldest plan yet and for these changes. I think it is really important that we focus on the scale of the issues at hand rather than how we will pay for the solutions. Right now we are facing a climate emergency. We are already experiencing severe weather, the worse drought in a century, fires, deadly heat waves, and this is just the beginning of a laundry list of catastrophic consequences for not action sooner. As a 20 something I am terrified of my future. I am even more terrified of our inactions that future generations will face who will not be able to have normal childhoods that are not impacted by devastating effects of this crisis. Right now we are at a moment where we have a chance to mitigate some of these worst effects. Nearly half of carbon emissions in San Diego county are transportation related. Our public transportation system in its current state will not reduce emissions to the point needed. It will not adequately alleviate equity concerns we must improve San Diego’s public transit system so it is a real alternative to private cars. SANDAG needs to do everything in its power to combat this crisis in this Plan. Our lives and our planet depend on it. This Plan is a great start but SANDAG needs to do better in reducing emissions and supporting transit equity and that includes incorporating the community-generated 10 transit lifelines in the Plan to improve our transit system and prioritize environmental justice communities. I think it is especially important that we look at anti-displacement measures in our plan. Thank you so much.</td>
<td>The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be implementing a social equity planning framework throughout the entirety of the Regional Plan. For more information on how the plan will benefit our region’s most underserved communities, please refer to Appendix H to find comparative analyses of projected social equity performance measures outcomes (such as PM2.5 emissions reductions) through Build vs. No-Build scenarios. SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG’s housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues. SANDAG agrees that action is needed now to provide frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation. SANDAG recognizes the urgent need for reduction of GHG emissions, especially in our most marginalized communities, as a key aspect in an equitable and sustainable future for the region. Attachment 2 of Appendix A includes a list of transportation projects aimed to reduce pollution exposure in our region’s disadvantaged communities in accordance to AB805 and CalEnviroScreen 3.0.</td>
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<td>M202</td>
<td>Mary</td>
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<td>Good morning Board members. VMT violates citizens constitutional rights to privacy and places undue burden on your constituents who can least afford a mileage tax. Bike lanes have been horrible for the environment. Now in the East Village, at any given intersections’ cars are stopped in four directions while bike lanes have a green light. Car exhaust is spewing in the air while no one is using the bike lanes. Cars now have to circle the block 10 times before finding a parking spot using more fossil fuels and adding exhaust fumes into the environment. Ironically, your presentation depicted the corner of Fifth and Juniper. I recently sat in a parking spot nearby while daughter was in a local business. During bike rode up the Fifth Avenue bike lane. Kevin Costner was wrong. Just because you build it doesn’t mean they will come. Congratulations to Hasan Ikhrata and the Board for your misguided waste of taxpayer money while adding to environmental problems. Thank you for your attention.</td>
<td>Final 2021 Regional Plan. Please continue to follow along in this process by visiting SDForward.com.</td>
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<td>M203</td>
<td>Megan Flaherty</td>
<td>San Diego Audubon Society</td>
<td>Hello, my name is Megan Flaherty. I am with the San Diego Audubon Society. First, I want to echo some of the comments by Laura and Michael Beck regarding the many benefits for natural habitat and wildlife that is going to come out of this plan. Especially the funding for the implementation of the MSCP and protection of our natural lands that’s a really big win and we really appreciate that. We do have some concerns however about some of the additional lanes especially Marian Bear Memorial Park. Similar to what Debbie said, any increase in traffic there is definitely going to impact that park as well as wildlife and the water quality and air quality that all ends up in the bay. We want to have as clean water as possible in that watershed. There is a little bit of confusion because the additional lanes will be within the existing footprint but there will be the construction of new connectors, concrete connectors. We’re very concerned about how those are going impact the already extremely squeezed wildlife corridors on either ends of Marian Bear Park. That speaks to another concern that we have which is that we should be making this Regional Plan, is protecting, and not negatively impacting our region’s parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Thank you for your support of habitat conservation efforts in the region. SANDAG appreciates and agrees with the concerns of any potential impacts to our region’s parks and natural spaces including Marian Bear Memorial Park. For this reason, the final draft 2021 Regional Plan will specify that expanding the present-day SR-52 will not expand beyond the current improved width. Prior to implementation of any Managed Lanes, significant additional planning and environmental analysis will need to be performed to assess the potential alignment of all improvements within existing footprints and will include review of any environmental impacts. Public outreach to stakeholders, including the San Diego Audubon Society, California Native Plant Society, City of San Diego, Marian Bear Memorial Park Advisory Group, and Friends of Rose Canyon will be a key component of these planning efforts.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>M204</td>
<td>Michael Beck</td>
<td>Endangered Habitats League</td>
<td>Michael Beck, San Diego Director of Endangered Habitats League. I’d like to thank in particular the staff for their hard work and engagement in particular, your Executive Directors and upper management that have created a culture of responsiveness as reflected in the changes in front of you today. As Laura Hunter said, this is not common experience of ours to see this kind of responsiveness so much appreciation. We strongly support the changes that are proposed and they’re making critical improvements including the full funding for the habitat plans which will have a significant impact. Not just on the biodiversity related issues but on climate change built on this permanent green belt that is developing within even the urban or suburban areas of San Diego county. Assuming the responsibility of protecting our amazing biodiversity and perpetuity. This funding would build on previous SANDAG commitments and efforts towards these habitat plans. You’ll see an example of this on your December 10th, Board meeting agenda. This natural open space is vital to maintaining a high quality of life as the region grows and develops. This is not something you see in many places in Southern California. It’s our hope that 50 years from now that kids will be able to look out of whatever window of the type of transportation system they’re in. And as they’re going down the I-5 and still be able to see mule deer in the green spaces along this corridor. Thank you very much.</td>
<td>To assist the region to meet its habitat conservation goals, the proposed final 2021 Regional Plan has identified $2,087 million for an enhanced habitat conservation, management, and monitoring program. These funds are complemented with a $665 million Nature-Based Climate Solutions Program that will promote both habitat conservation and restoration and carbon sequestration (See Climate Adaptation and Resilience programs). In addition, future mitigation of the transportation projects included in the 2021 Regional Plan will result in an additional $300-500 million of land acquisition and restoration for habitat mitigation (incorporated in project costs presented in Appendix A). SANDAG is committed to working with its regional partners to identify funding to fulfill this commitment.</td>
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<td>M205</td>
<td>Mike Bullock</td>
<td>Oceanside</td>
<td>Honorably Board, Chair, and Members. Mike Bullock, Oceanside. I support the 5 Big Moves. There are changes I would like. One is to adopt a strategy to get a parking system that stops discriminating economically against those that don’t drive. I am a member of the Oceanside Bike Pedestrian Committee. I am not authorized to speak for them. However, I fully support their letter requesting specific projects in Oceanside. I would like to highlight the two that are in Oceanside’s Mobility Hub. The first is the Coast Highway Road Diet and incentive zone to expand from state Route 76 to Morris Street. The incentive zone has more density, more height, and less parking. I thank Councilman Rodriguez for his strong support of this project when it was approved by the City Council. The corridor is what’s cool about Oceanside. It has a Sprinster station and is only 2 blocks from the transit center and it goes by the City Hall. The City may become the first employer in the world to operate their employee car parking for the financial gain of its employees. The second project is to connect the coast neighborhoods to a high trip count destination shopping center with a bicycle pedestrian bridge over I-5 in the Vista way and Kelly Street area. Again, these projects are in the middle of Oceanside’s bicycle hub. Thank you.</td>
<td>We have reviewed and responded to the Oceanside Bicycle and Pedestrian Committee via Tom Lichterman and appreciate your specific recommendations for projects. SANDAG includes bike racks and secure parking in conjunction with our transportation projects and have also provided grant funding for the City of Oceanside to set up a secure bike parking area near their City Hall. We will continue to work with local agency jurisdictions though our Smart Growth and Active Transportation Grant programs to increase the number of secure parking areas for bikes and personal micromobility devices.</td>
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<td>M206</td>
<td>Noah Harris</td>
<td>Climate Action Campaign</td>
<td>Good morning Chair and Board, this is Noah Harris with Climate Action Campaign calling in support of the 2021 Regional Plan. Transportation projects to begin implementing some of the emissions reductions than any other sector in the region by far. If we are to achieve zero carbon as soon as possible, which the most up-to-date climate science says is necessary to save us the worse impacts of the climate crisis, we have to shift people out of their fossil fuel cars and into more sustainable modes of travel such as biking, walking, transit. This is a key strategy for climate action and transportation. One item of discussion has been the road usage charge and we want to urge the Board to consider the following. First, the RUC would be meant to replace the gas tax which willx decline sharply with the transition to electric vehicles would still be a crucial funding source for future transportation projects. Also, it would be deeply inequitable to continue relying on the gas tax with the transition to EVs. Working class communities tend to drive older, less fuel-efficient cars while EVs are expensive and inaccessible for many especially for transit-dependent riders. EVs will not address congestion and they will cause pollution and wear and tear on our roads. The 2021 Regional Plan is a critical step towards a more equitable climate, just transportation future. We urge your support. Thank you.</td>
<td>We appreciate your support and feedback. SANDAG is working on designating pilot programs and 10-year plan for a full implementation of the elements outlined in the proposed final 2021 Regional Plan. Please continue to follow along in this process by visiting SDForward.com.</td>
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<td>M207</td>
<td>Pamela Hetherington</td>
<td>Environmental Center of San Diego</td>
<td>Good morning Chair Blakespear and Board members. My name is Pam Hetherington, I’m on the Board of Directors of the Environmental Center of San Diego. We strongly support the revision staff has proposed for 2021 Regional Plan. In addition to our support for the visions laid out in the Regional Plan, we realize that full funding for our regional habitat plans is foundational to its success. This is our last best chance to address the climate crisis. The environment is the foundation for all living things. The bold vision before you becomes whole with these new changes. It allows San Diegoans to act locally while thinking globally before it’s too late. Thank you kindly.</td>
<td>We appreciate your support and feedback. Please continue to follow along in this process by visiting SDForward.com.</td>
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This is Paul Jameson from San Diego. I support this plan and the recent modifications. I’m incredibly excited to see free transit as part of the updated plan. I’m also thrilled about the additional emphasis on Vision Zero. I want to second the earlier comments about bicyclists being killed. You know these are folks who are doing the right thing on transportation, reducing emissions, reducing the number of cars on the road and they’re being killed for some time. So thank you for that additional emphasis. I support the plan’s emphasis on electric vehicles. I think that’s an important step in addressing climate change. So I credit SANDAG for taking up with a fair price, one-time charge added to the registration of electric vehicles, I think that’s an fair amount based on you know, miles driven. Everybody knows that you can check with leave the gas tax, we pay for what we use and then you can probably calculate what would be a fair amount based on you know, miles driven. Everybody knows that you can check with insurance companies to find out how many miles whatever you can find a way and then come up with a fair price, one-time charge added to the registration of electric vehicles, I think that’s an approach that would make a lot more sense because trust me people will disobey. They will not get the monitors in there and not to mention the monitors are going to be again another one more thing that’s hackable. I deal with that a lot in my business trying to prevent hacking.

Thank you for your comment and support for the 2021 Regional Plan.

Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

Great, thank you. My name is Phil Petri. I’m with the Interfaith Coalition for Earth Justice. I want to thank the Board and SANDAG staff for their hard work on this Regional Plan. I believe it is the best Regional Plan, transportation plan we’ve ever had to come before us. I also want to encourage SANDAG to take further steps to reduce emissions and to support transit equity. We need to do everything we can about climate change, meeting our climate action goals and so forth. I want to address something very specific which is the issue of bike lanes. My wife teaches at USD, and she bikes to work whenever she teaches so she has to go down to the valley and back up again. She is very aware of how much safer she feels when she is in a protected lane. Of course, in some places there are no bike lanes at all, let alone protected lane. Shepasses everyday by the ghost bike that is right now down on Camino Del Rio south. For the cyclist who was killed there, I think about 2 months ago. So we do not want any more cyclists killed on the road. They are doing the right thing by biking and having 0 emissions getting to and from places. A lot of SANDAG follows national and international best practices in bikeway design to create safe facilities for users of all ages and abilities. Multiple studies show that most people feel safer in protected bikeways, and when well designed, they are safer than any other type of bike facility. The focus of our efforts is on people who may be “interested but concerned” in riding a bike alone or with family. For those who do not feel comfortable riding in protected bikeways, the California Vehicle Code allows people to bike in the roadway with traffic. While protected bike lanes are a great solution in many cases, we know they are not always the best solution. Every project goes through a detailed and context sensitive design process which results in decisions regarding the best facility, which may include protected bikeways, buffered bikeways, shared use paths, or shared streets with significant traffic calming elements. The Regional Plan also includes funding for upgrading existing bikeways that may not meet current best practices in maintenance or bikeway design.
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<td>M211</td>
<td>Roddy Jerome</td>
<td>Good Morning board members. My name is Roddy Jerome. I’m a resident of City Heights. We want to thank you for the funding of the pilot program that was passed last week regarding bus frequency and extended service hours for daily trans users like me that work with senior citizens that can’t drive. Shorter commutes help cut travel time and ease the challenge of carrying medical equipment like limited oxygen supply. The pilot program is only a reflection of what is needed in our communities and the Regional Plan, which we fully support, if included will help with bus frequencies anticipated to name a few things. We hope you include in the Regional Plan City Heights is a diverse community with good people, different foods and cultures. Many refugee groups displacement is a concern for our community because the people that live there are who create the community we need to protect transit dependent community members that currently live there. We don’t want people to have to move further out of transit service areas and to be burdened with long commutes to get to and from work. Everyone has to do their part to address the housing crisis. I understand that the anti-displacement study incentive program that is included in the regional planning is a good starting place, but I feel we need to do more to protect our communities. We’re asking to commit to building the necessary infrastructure so developers can build more affordable housing. Again, thank you for all the hard work appreciate your time and opportunity to be heard.</td>
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<td>M212</td>
<td>Steve Galb</td>
<td>Hello, thank you so much. I am a grandfather concerned for my grandchildren. The climate crisis doesn’t care about politics. Without a major course correction, some even much of the earth will become uninhabitable in the future because of extreme heat, severe weather events, crop failure, and inadequate access to water. That future is a hellscape we must avoid. I urge the Board to adopt and quickly build upon the 2021 Regional Transportation Plan. I take transit in San Diego as much as possible and experience how frustrating the current system is. There is a bus that can take me near my home but the connection at the Fashion Valley trolley station requires a 20- or 25-minute wait. I walk the mile home up a steep hill instead of waiting, but most people can’t or won’t do that. A friend visiting from Germany wanted to go to the beach and took him hours to get there by transit. Please continue to elevate the 10 transit lifelines which were developed by climate justice communities. In particular, be sure to include anti-displacement strategies in future transportation plans to maintain the character of these communities as their transit is improved. Thank you.</td>
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<td>M213</td>
<td>Tim Bilish</td>
<td>Thank you so much for this. I just want to extend the concern for the PM 10 PM 2.5. The staff has described the further attempts to reduce the particular sizes. I would suggest looking at the impact of the wildfires contribution to that as well as the concern for respiratory diseases contributing to the pandemic diseases. Appreciate the time.</td>
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We appreciate your support and feedback. Please continue to follow along in this process by visiting SDFoward.com.

The 2021 Regional Plan has been developed with equity at the forefront. SANDAG will be applying a social equity planning framework throughout the implementation of the Regional Plan. Through this framework, one of the Regional Plan’s near-term actions includes developing a Digital Equity Strategy and Action Plan that will address regional accessibility gaps in communications infrastructure, technology, and digital literacy. We have been working with our Community-Based Organization partners (or CBOs) to ensure that language translations and educational resources on transit are available to all San Diegans as we advance with our next OS system and build upon improving our existing transportation systems.

An equity specific project list has been included in the draft 2021 Regional Plan Appendix H. SANDAG will include the projects that benefit environmental justice communities in Appendix A in the proposed Final 2021 Regional Plan. This information was published in Appendix H Attachment 3 of the Draft but will be moved to Appendix A and updated.

SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. The proposed final 2021 Regional Plan includes increased service spans for the Trolley and bus service up to 20 hours per day. As SANDAG and the transit agencies move into more detailed planning efforts in the near future, some routes will be considered for 24-hour operation.

The Mid-City Trolley Line (Purple Line) is included as the first major new rail project in the Plan and will serve the north-south travel needs in Sorrento Mesa, National City, Kearny Mesa, and University Heights. The South Bay to Sorrento Comprehensive Multimodal Corridor Plan is completing a more detailed ridership analysis of this route. The analysis is studying an alignment that would include stations in City Heights and at San Diego State University (west campus). Also, transit subsidies are a component of the proposed Final Plan and implementation of those subsidies would include a consideration of low-income and youth populations.

Thank you for your comments. SANDAG agrees that action is needed now to provide fast, frequent, reliable, and accessible transit, especially on highly utilized routes. Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors in advance of approval of the 2021 Regional Plan to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase services on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, will be added to Appendix A in the proposed final 2021 Regional Plan.

SANDAG is developing a Regional Housing Incentive Program and it will meet the goals of the proposed final 2021 Regional Plan. SANDAG’s housing incentive program will include development of a regional anti-displacement strategy, consider climate change and resilience, consistency with the transportation improvements included in the Regional Plan, and alignment with other SANDAG grant programs. Additionally, SANDAG will coordinate with its Social Equity Working Group, tribal nations, and other interested stakeholders to ensure the housing incentive program promotes equity and addresses gentrification, displacement, and other issues.

This comment is responded to in the Final EIR. Please see Comment 2 in Appendix P to the Final EIR.
M214 Toshi Ishihara

My name is Toshi Ishihara and I'm over with San Diego City 50 and also a member transportation equity working group. I support the RP and I believe that main objective of RP is transform regional transportation justice and equity. Fight climate change and prepare this region for the future and for the worst impact of climate change and to reduce pollution and greenhouse gas emissions. We should include road-usage fees or in other words, I can say with confidence that 10 years from now most of the vehicles will be better emission vehicles. That we won’t use a drop of gasoline. Many of us use public use public transit, but many of us will continue to drive. We have to come up with a means to pay for that. We will need to continue to maintain freeways and streets. The price of climate change is far greater than fees to maintain. For that, we would need a strategy to pay. And the road-usage charge should be considered. I urge all the members support the RP for our bright future. Thank you.

Response

Thank you for your comment and support for the 2021 Regional Plan.

Website

W562 Debbie Levy

Have you all lost your minds or decided that San Diego has transformed into a county of multi-millionaires? I understand it's to fund transportation but every time I see a bus it is empty and every time I see a trolley it's also barely filled. Not the point-point is that this is a senseless, poorly thought out idea once again by this board. The logistics alone are beyond your reach. Please come to your senses people.

Response

Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted.

We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that's when the state is planning to do it. We don't yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation.

We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.

W563 Gary Lewis Evans

I don't like the new mileage tax - we pay enough gas tax.

Response

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<td>W564</td>
<td>Gregg Parker</td>
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<td>How exactly does SANDAG expect to know how many miles people are driving, and how often will this tax be paid, daily, weekly, monthly, annually? This is an awful idea, and I really think the public outrage is going to be something you have never seen before.</td>
<td>Funding for the 2021 Regional Plan will come from a variety of federal, state, and local sources. One potential source of funding being considered by SANDAG, and studied by the federal and state governments, as a replacement to the gas tax is a road usage charge. Unlike the gas tax, a road usage charge program is based on how much a person drives, rather than how much gas they purchase, and can be designed to ensure that low-income and other underserved populations are not disproportionately impacted. We know there are a lot of questions about what this might mean for the San Diego region. Right now, the 2021 Regional Plan assumes a road usage charge would be implemented in 2030 because that’s when the state is planning to do it. We don’t yet know exactly what it will look like, how the charges will be collected, or what the parameters of the policy will be. However, next year, SANDAG will begin a study to help answer these questions. It will look at the effect that the fee would have on meeting established goals like equity for income levels and greenhouse gas emissions reduction and the potential impacts of user fees on San Diego residents, visitors, and businesses, particularly those relying heavily on transportation. We know this is a change and we respect the concerns raised. SANDAG is monitoring what the state is doing, including potential legislation that may be passed, and will work closely with the Board, stakeholders, and the community to develop a program that is fair, flexible, and sustainable. And, as always, we welcome any ideas you may have for an alternative way of paying for our transportation system.</td>
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<td>W565</td>
<td>J Vazquez</td>
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<td>Hello - I heard on the radio today that the regional plan is being updated to reflect the infrastructure dollars coming to our region. I’d like to know if the expansion of I-5 between Vista Way &amp; HWY 76 is being prioritized in this update. Thank you.</td>
<td>The Build NCC I-5 HOV lane project is being constructed from south to north and includes the northern segment (to Harbor/Vandegrift) as part of its project level environmental analysis. While funding has not yet been identified or programmed, SANDAG continues to pursue funding for implementation of this project consistent with the proposed Regional Plan.</td>
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<td>W566</td>
<td>NA</td>
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<td><strong>Will public transportation fares be cheaper/more affordable?</strong></td>
<td>Se enviará un artículo al Comité de Transporte de SANDAG y a la Junta Directiva para enmendar el presupuesto de la agencia y actuar ahora para invertir en tránsito que beneficie a las comunidades de justicia ambiental. Esta acción busca aumentar los servicios en las líneas de tránsito que tienen un servicio poco frecuente en las tardes y hasta altas horas de la noche, y/o proporcionar subsidios a las tarifas para los pasajeros jóvenes. Además, se agregarán más aclaraciones sobre las mejoras planificadas a la red de autobuses, incluidas las mejoras en la frecuencia y el alcance del servicio, al Apéndice A en el Plan Regional propuesto final para 2021.</td>
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Staff are bringing forward an item to the SANDAG Transportation Committee and to the Board of Directors to amend the agency budget and act now to invest in transit that benefits environmental justice communities. This action seeks to increase service on transit lines that have infrequent service in the evenings and late nights, and/or provide fare subsidies for youth riders. Additionally, further clarification on planned improvements to the bus network, including frequency and span-of-service improvements, will be added to Appendix A in the proposed final 2021 Regional Plan.