

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

	Date	Form	Name/Agency	Comment	Response
The Comments Below Reference the Draft RCP Released by the SANDAG Board of Directors in December 2003					
1	11/18/03	letter	Arthur Coe, California Regional Water Quality Control Board (CRWQCB)	Section I, Second paragraph. The statement "Storm drains are not connected to wastewater systems or treatment plants." is no longer true. With the advent of storm drain diversion structures to protect beaches from dry weather flows, many storms drains are connected to wastewater collection systems and sewage treatment plants.	Paragraph was changed to read: " <u>Most</u> storm drains are not connected to wastewater systems or treatment plants."
2	11/18/03	letter	Arthur Coe, CRWQCB	Section I, Third paragraph. Reading this paragraph one could conclude that fresh water discharging from storm drains creates water quality problems. In fact, the pollutants in the water being discharged from the storm drains, not the fresh water, cause the water quality problems	Paragraph was changed to include the "polluted" storm water.
3	11/18/03	letter	Arthur Coe, CRWQCB	Section I, Sixth paragraph. Current research indicates that imperviousness in excess of 10 percent adversely impacts downstream ecology.	Paragraph was changed to include 10% and references the RWQCB
4	11/18/03	letter	Arthur Coe, CRWQCB	Section I, Seventh paragraph. Third sentence: suggest replacing "poses" with "indicates"	Paragraph was changed to reflect this comment
5	11/18/03	letter	Arthur Coe, CRWQCB	Section I, Eighth paragraph. In sentence six it appears the correct words should be "down current" instead of "downcast". Footnote #4 also appears to be in error.	Paragraph was changed to reflect this comment.
6	11/18/03	letter	Arthur Coe, CRWQCB	Section I, Ninth paragraph. The Regional Boards current municipal storm water permit for San Diego County requires that the cities and other jurisdictions begin to address control of storm water pollutants on a watershed basis.	Paragraph was changed to reflect this comment. The second paragraph in the legislation section was changed, and it now mentions watersheds.
7	11/18/03	letter	Arthur Coe, CRWQCB	Section II, Fourth paragraph. The Regional Board is a storm water <u>regulatory</u> agency not a storm water management agency.	Paragraph was changed to reflect this comment.
8	11/18/03	letter	Arthur Coe, CRWQCB	Section II, Sixth paragraph. Third sentence from end. San Diego County jurisdictions are required to <u>implement</u> the new NPDES permit, not enforce it.	Paragraph was changed to reflect this comment.
9	11/18/03	letter	Arthur Coe, CRWQCB	Section II, Sixth paragraph. Last sentence. Incorrect. The municipal storm water permit requires that municipalities reduce pollutants entering their storm water conveyance systems to the Maximum Extent Practicable (MEP).	Paragraph was changed to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

10	11/18/03	letter	Arthur Coe, CRWQCB	Section II, Eighth paragraph. The citation on penalties is incorrect. Suggest the following: "If the cities fail to comply with this new permit, they are subject to monetary penalties. The penalties that may be assessed administratively by the Regional Board range from \$3,000 per day for failure to submit required monitoring reports to \$10,000 per day of violation for permit violations. The Regional Board can also request that the Attorney General pursue monetary penalties in Superior Court. Penalties imposed by the court can be as high as \$25,000 per day of violation for permit violators.	Paragraph was changed to reflect this comment, and the RWQCB was cited as the source.
11	11/18/03	letter	Arthur Coe, CRWQCB	Section II, Eleventh paragraph. This paragraph indicates some sort of deal struck between the Regional Board and the County. There was no such agreement. The County proposed revised language for AB 1517 at their initiative. The bill, which would have been DOA in its original form, subsequently died a natural death.	Paragraph was changed to reflect this comment.
12	11/18/03	letter	Arthur Coe, CRWQCB	Section IV, First paragraph. For clarification, the text should indicate that many local agency storm water projects are for flood or runoff control (curbs/gutters, catch basins, storm drains, flood control channels, etc.) and have nothing to do with water quality improvement.	Comment noted, and a sentence was added for clarification.
13	11/18/03	letter	Arthur Coe, CRWQCB	Section V, paragraphs four and five. These paragraphs seem to presume that regional treatment of storm water is needed and desirable. In fact, effective programs that result in water quality improvements in receiving waters impacted by storm water discharges are based on a wide variety of control measures, most non-structural.	The IRIS suggests that storm water issues need to be addressed comprehensively in the region, but does not recommend a specific method of treatment. Instead, the IRIS suggests that the region needs a comprehensive master plan for storm water management, which might include treatment facilities or other approaches that protect water quality.
14	11/19/03	letter	COMPACT (Community Planners Advisory Committee on Transportation)	Guiding Principles for an Alternative Strategy for Transportation Infrastructure Planning #2 - "Traffic and transportation planning must anticipate and meet the needs of commerce."	The region is focusing more effort on goods movement and the growing needs of commerce in the long-range transportation plans.
15	11/19/03	letter	COMPACT (Community Planners Advisory Committee on Transportation)	Guiding Principles for an Alternative Strategy for Transportation Infrastructure Planning #3 - "All major highway transportation corridors should be multifunctional and multimodal, not restricted solely to automobiles, motorbikes or commercial vehicles."	The present RTP and future updates will continue to evaluate ways to optimize the existing corridors (such as with HOVs or managed lanes), while minimizing impacts.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

16	11/19/03	letter	COMPACT (Community Planners Advisory Committee on Transportation)	Guiding Principles for an Alternative Strategy for Transportation Infrastructure Planning #4 - "Transportation corridors should be defined by their accessibility, use and multifunctionality as primary, secondary, tertiary."	The regional network is classified by its level of access control. However, reclassifying the network as suggested in the committee's report would be difficult based on the suggested limited access points of no less than 2 miles apart for the primary and secondary system.
17	11/19/03	letter	COMPACT (Community Planners Advisory Committee on Transportation)	Guiding Principles for an Alternative Strategy for Transportation Infrastructure Planning # 5 - "The level of acceptable congestion on major highways must be defined in advance since such roads cannot be expected to be congestion-free."	We acknowledge that the improvements in the RTP will ease congestion but not eliminate it. And many of the new multimodal improvements (e.g., bus rapid transit, HOV lanes), will owe part of their success to the continued congestion on the highway system for single-occupant vehicles.
18	11/19/03	letter	COMPACT (Community Planners Advisory Committee on Transportation)	Guiding Principles for an Alternative Strategy for Transportation Infrastructure Planning #6 - "The benefits of transportation infrastructure planning, when predicated on Principles 1-5, would be shared by both present and future tax revenue sources, and therefore costs should be shared."	Methods to provide funding for the transportation system are considered with each RTP update.
19	11/19/03	letter	COMPACT (Community Planners Advisory Committee on Transportation)	Suggest incorporating into the RCP their recommended Six (6) Guiding Principles for an Alternative Strategy for Transportation Infrastructure Planning. #1 - "Densification of population and development should follow not precede a comprehensive transportation policy."	Smart Growth decisions regarding development in transportation corridors is intended to go hand-in-hand with prioritized transportation improvements.
20	12/10/03	letter	David Krogh, Chula Vista citizen	Might entire document, and perhaps even the Vision 2030 statement, include reference to contingency plans if the most visionary, utopian hopes do not come to pass as hoped (i.e. what is Plan B), since Plan B is needed all too often on this planet.	The RCP is a "living document" that will be updated every three to five years. If it is determined, over time, that the RCP is not meeting the needs of the region, it can be changed to better reflect the circumstances at that time.
21	12/10/03	letter	David Krogh, Chula Vista citizen	Review grammar in second paragraph on page 64 under Regional Airport Planning. Paragraph sounds a little awkward, like it got chopped during editing. Consider agreement of singular/plural of "they" with SDCRAA, etc.	The text has been amended to reflect this comment.
22	12/10/03	letter	David Krogh, Chula Vista citizen	Check consistency/inconsistency of statements on pp. 52-53 about 9M, 13.5M, 16M projected regional trips and "projected to continue."	The text has been changed to reflect the most recent figures for daily regional trips, which are estimated from the SANDAG transportation model. The future trends have been consistent since 1980 and are expected to continue into the future.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

23	12/10/03	letter	David Krogh, Chula Vista citizen	Suggest adding a couple of words in vision statement on page 51 that reflect details expressed elsewhere in document, e.g. "such as added lanes" (p.66): "Many of our existing regional freeways, highways, and major roadways have been expanded, including an extensive managed lane network for transit and carpools."	Vision statement has been revised accordingly.
24	12/10/03	letter	David Krogh, Chula Vista citizen	Perhaps last sentence of 2030 Vision statement, in addition to mention of "additional leisure time", could allude to avoiding traffic congestion robbing more and more time from people's lives (e.g. family) and stress and aggravation (of being stuck in traffic) and cost (additional accidents due to congestion.)	Sentence has been revised to read "As a result, more people have additional leisure time and less travel-related stress."
25	12/10/03	letter	David Krogh, Chula Vista citizen	2030 Vision statement on page 51 sounds very optimistic, visionary, and utopian. My first impression was "too utopian;" however, to accomplish things, we do need to aim high. So, I will limit criticism to suggesting that the statement "As a result, many children walk or bike to school, as we used to do when we were younger" be stricken. I used to walk to school, and wouldn't it be nice, but that statement seems like a misguided attempt at evocative sentimentality. I believe that kids that are driven to school these days because of perceived security concerns that were not perceived when we were kids, and curing those concerns is not germane to this Transportation section, and that is not likely to occur based on actions taken in response to this section.	An objective of the RCP is to encourage more walkability within our communities, and more livable communities. The text in this section was not changed.
26	12/10/03	letter	David Krogh, Chula Vista citizen	On page 73, #14, how and by who (SANDAG, cities, or ?)	SANDAG would coordinate with local jurisdictions the review of large development projects for consideration of RCP, CMP, and RTP policy objectives.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

27	12/10/03	letter	David Krogh, Chula Vista citizen	<p>Re "increases in state and federal gasoline taxes based on historical trends" (p.67), has some observation and analysis occurred about how it came about that those taxes were increased in the past, and consideration given to what practical steps might be necessary or helpful? In other words, are we planning to passively wait until unforeseen future events result in increases, or will any proactive step be taken by San Diego regional authorities? Proceeding from the premises that (1) it will take money to cure/mitigate our transportation and traffic problems, (2) solutions to regional vehicle congestion problems should be funded from those who need and will benefit from them, and (3) we are "wishing" for increases to occur, I suggest that a point #15 on page 73 under Planning, Design, and Coordination actions, or #5 under Funding actions be added to the effect: Research the role of SANDAG and other local San Diego County jurisdictions in support of possible future gasoline tax increases that might help fund needed automobile transportation congestion reduction and transportation capacity expansion. I don't think you'd want to say it in this document, but I'm thinking how about a five cent per gallon increase in gasoline tax, in the short run, followed by a one cent per gallon per year increase thereafter for a period of, say, 20 years.</p>	<p>Future increases in gas tax revenues is an important funding source for transportation improvements. While not singled out on Page 73 of the draft RCP, they are included in Funding Action #1.</p>
28	12/10/03	letter	David Krogh, Chula Vista citizen	<p>On page 71, under Policy Objectives, consider moving #3 up to #2, and #7 up to #3, existing #2 and 4-6 drop down as required. Perhaps #10 should move up also.</p>	<p>The Policy Objectives are not listed in order of priority.</p>
29	12/10/03	letter	David Krogh, Chula Vista citizen	<p>Also, the statement on page 54 "average commute time in the region grew by only three minutes between 1990 and 2000" belies the fact that pre-existing regional transportation infrastructure has been increasingly consumed since that timeframe due to growth outpacing infrastructure expansion, and that marginal load increases at capacity may in future, and are already in 2003, resulting in disproportionate degrees of deterioration.</p>	<p>The comment made here is valid and is supported by the following sentence in the text, which states that peak periods are becoming longer to accommodate the growing traffic volumes that exceed the original peak hour capacity.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

30	12/10/03	letter	David Krogh, Chula Vista citizen	Reference to "added lanes" on page 66, statement "... it requires a combination of key transportation infrastructure investments, such as added lanes, HOV lanes (etc)": Did you add this just for me? I heartily approve its inclusion, and its relative positioning. I believe that it is probably in concert with what you always intended, but words are powerful, and I think that it is significant that you explicitly state it as you have here, since, as I have observed, it has seemed to go unsaid many times.	Capacity improvements must accommodate the growth in auto and mass transit travel.
31	12/10/03	letter	David Krogh, Chula Vista citizen	References to impact fees (p. 69, #3a; p. 73 Funding #3) and local agency contribution (p. 69, #3b) seem responsive to my proposed concepts, although I know that statements by some folks indicated that the concept was not previously unknown.	Local and regional impact fees for transportation facilities are a reality in many jurisdictions, and in counties other than San Diego.
32	12/10/03	letter	David Krogh, Chula Vista citizen	Reference to "sub-regional" (pp. 67, 69 #4a, 72 #1a): Although I am unaware of specific implementation steps, a few of the people that I have talked to have been aware of this anticipated change in approach, and seem to think that it will be beneficial, so I am happy to see it mentioned, and hope that means that whatever successor there might be to the I-805/I-5 Technical Working Group will soon start moving.	No text change was required.
33	12/10/03	letter	David Krogh, Chula Vista citizen	Good statements: page 69, under Ensuring Economic Prosperity: "transportation network is the lifeline of commerce, and that lifeline is slowly being strangled by growing congestion;" p. 66: "Dramatic increases in motorized travel, combined with limited financial capacity to improve roads and build more transit, have resulted in severe congestion on many of our major roadways during rush hours. Besides simply being annoying, this hampers our region's productivity and long-term economic prosperity; p. 52: Roads and freeways are clogged. In fact, many of the region's major transportation facilities are operating at or beyond their capacity.	No text change was required.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

34	12/10/03	letter	David Krogh, Chula Vista citizen	Statement on page 60 "analyses indicate smart growth results in fairly minimal impacts on the region's overall transportation system performance in the near-term, they are clearly a step in the right direction" is good. I concur. It's good to know that document is balanced in admitting this. It confirms my subjective intuition that smart growth and transportation demand management are nice sounding terms but that they only can accomplish so much, and that we also need capacity increases.	No text change was required.
35	12/10/03	letter	David Krogh, Chula Vista citizen	On page 67, under Transportation Funding, the mention of amount set aside (\$20B) for operating and maintenance costs is interesting. I hadn't previously realized how big a chunk that was. I wonder out of the \$10B from TransNet extension included in the \$42B, how much is capital versus operational?	As of May 28, the proposed <i>TransNet</i> extension would generate \$14 billion over 40 years. For the Major Transportation Corridors and Transit System improvements, capital versus operating costs are \$5.8B and \$3.3B.
36	12/20/03	E-mail	Don Wood	Chapter 4B is incomplete. It appears to promote more sprawl development throughout the county, instead of the smart growth policies the SANDAG board keeps talking about.	Both the RCP and the RTP are specific in their goals and objectives to reduce sprawl and to entice development to existing and planned urbanized areas.
37	12/20/03	E-mail	Don Wood	The land use-transportation connection, which talks about how we need to keep expanding our roads and highway system to keep up with growth, completely ignores the transportation-land use connection whereby SANDAG has used state and local tax money to subsidize sprawl development in our county over the last twenty years.	The intent of the RCP is to avoid past growth patterns and refocus our transportation dollars into the urbanized area to serve existing development and smart growth opportunity areas.
38	12/20/03	E-mail	Don Wood	SANDAG's inability to see how designing new roads and freeways into our rural and agricultural areas are bound to result in new sprawl development which has to be confronted and addressed in the RCP. If we don't address this disconnection between transportation planning and the need to curb sprawl now, the RCP will be useless, and SANDAG will continue to promote and subsidize stupid growth as usual.	In the RTP, new facilities are only designed to serve planned development as per the adopted general plans. An example is SR 125 in South Bay, serving the planned Otay Ranch and Otay Mesa communities.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

39	12/20/03	E-mail	Don Wood	Add an additional section to the draft transportation chapter dealing with the transportation land-use connection. This would involve a short history of San Diego's growth, as it expanded outward from Downtown following the regions larger roads and highways like Highway 80 and Highway 395. Show how new regional shopping centers and housing subdivisions sprang up along these roads as local jurisdictions upzoned land along their rights of way allowing spectators to reap billions of dollars in profit. Note that many of these profits wouldn't have been realized if state and local tax money hadn't been used to pave the way.	The Urban Form chapter contains a history of the region's growth. The goals and objectives of MOBILITY 2030 and the RCP discourage transportation facilities that might induce growth in areas not already planned for such growth by local jurisdictions.
40	1/9/04	E-mail	Carolyn Chase	Incorporate planning for land use patterns and fires in the RCP.	The Urban Form chapter discusses the need to design communities to facilitate the protection from fires by avoiding development in fire-prone areas. In the Healthy Environment Chapter, natural fire ecology was added as a key issue along with an action item calling for the consideration of wildfires when designing future developments.
41	1/9/04	E-mail	Carolyn Chase	One paragraph about park, libraries, police, fire, and hospitals is pretty weak for something called a Regional Comprehensive Plan.	The Urban Form chapter includes a discussion on the relationship between land use patterns and public safety. The scope of the RCP did not include consideration of a public safety chapter. However, a brief description about SANDAG's new Public Safety Committee has been added to the Public Facilities chapter of the RCP, and the addition of a Public Safety chapter will be considered in future updates to the RCP.
42	1/9/04	E-mail	Carolyn Chase	We need a public safety chapter in the RCP. An ARJIS summary should be pulled in as part of a Chapter on public safety. It should also document the network of agencies involved in public safety and regional level planning. Some discussion about the relation between land use patterns and public safety is warranted within existing chapters as well.	The scope of the RCP did not include consideration of a Public Safety Chapter. However, the Implementation Chapter of the RCP indicates that additional topics will be considered in future updates to the RCP. The Public Facilities Chapter references SANDAG's Public Safety Committee that was recently created to advise the Board of Directors on major policy level matters related to public safety.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

43	1/13/04	E-mail	Wallace Tucker	The definition of Smart Growth on page 8 of the Exec. Summ. of the RCP makes no explicit mention of open space or resource values. I would like to change the definition to the following: Defining Smart Growth- Smart growth is a compact, efficient and environmentally-sensitive pattern of development that provides people with additional travel, housing, and employment choices by focusing future growth away from rural areas and closer to existing and planned job centers and public facilities, while conserving open space and natural resources.	The smart growth definition was changed throughout the document incorporating open space and natural resources more prominently.
44	1/14/04	E-mail	Hans Norden, H+C, LLC/Business Mechanics	I want to stress the need that ALL city projects affecting our community are harmonized since one facilitates the other. Because of the interconnectedness of individual projects, we must stop and reconsider further development as soon as it becomes foreseeable that the prerequisites on which that particular project was approved will not be met. We have to make choices. That is inherent to a democracy we live in. Besides, the goals set forth in the Mayor's State of the City clearly indicates limits to development. The sky is NOT the limit.	The RCP shares the perspective that projects and infrastructure investments must be harmonized, and provides a framework for a coordinated and comprehensive planning and implementation approach.
45	1/16/04	E-mail	Terri Williams, Community Forest Advisory Board	Appendix 4, Draft Integrated Regional Infrastructure Strategy (IRIS), should include a Chapter A.9, "Community Forest". The content of the "Community Forest" chapter should be based on the July 2003 San Diego Urban Ecosystem (Tree Canopy) Analysis (which can be found as an attachment to the email).	The scope of the RCP did not include this topic. The Implementation Chapter states that additional topics will be considered in future updates to the RCP. The suggested topic could be considered at that time.
46	1/20/04	E-mail	Congresswoman Susan Davis	Members of the community expressed their concern for the need to include military personnel and their family members when developing comprehensive plans for the future. It is vitally important to San Diego's economy that we retain our current installations and attempt to attract new commands to our region. Ensuring adequate housing and a high quality of life for military personnel will be key to keeping and expanding the current military presence in our community. It is important to work with our military leadership and make certain that the needs of San Diego's military families are taken into account as it undertakes the important task of developing a Regional Comprehensive Plan.	We concur that the military needs to be included in preparing the RCP; we have involved the Department of Defense in the planning process as an advisory member of the Regional Planning Committee. A discussion of military housing needs has been added to the Housing chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

47	1/22/04	E-mail	John Suhr	The RCP is too general and needs to get much more specific. Where are the overall plans including land use?	The Implementation Framework chapter of the draft RCP recognized that it served as a starting point in organizing how the plan's goals, policy objectives, and actions would be carried out, and that a more detailed implementation strategy would be included in the final RCP. The final RCP includes Strategic Initiatives that include lead implementing agencies and time frames for completion. Additionally, please note that SANDAG does not have land use or regulatory authority. The RCP is an incentive-based and collaborative plan.
48	1/22/04	E-mail	John Suhr	Legal extortion by special interest groups distorting planning must be prevented. Seek legislation forcing the loser to pay the total cost of such litigation to reduce this threat.	This is beyond the scope of the RCP.
49	1/22/04	E-mail	John Suhr	A new unified regional fire command needs to be created that will immediately employ full resources of all government agencies to control wildfires before they get out of hand, regardless of where the fire occurs or the time of day.	The scope of the RCP did not include consideration of this topic. However, the Implementation Chapter of the RCP indicates that additional topics will be considered in future updates to the RCP. SANDAG recently appointed a Public Safety Committee to advise the SANDAG Board of Directors on major policy-related matters related to public safety. One of the goals of the committee is to promote public safety through collaboration, information sharing, effective technology, and objective monitoring and assessment.
50	1/22/04	E-mail	John Suhr	All SANDAG decision making should be taken online. The public should be completely informed of all proposed actions and allowed full feedback.	All SANDAG agendas and meeting and workshop notices are posted on-line. In addition, SANDAG Board and Transportation Committee meetings are broadcast live on the SANDAG Web site. Opportunities for additional on-line participation will be explored when the RCP is updated.
51	1/22/04	E-mail	John Suhr	Focus on 21st century technologies should be greatly increased to reduce traffic congestion.	Use of e-connections can reduce the need to travel. Until evidence appears to show a major behavior shift, only a small amount of telecommuting, e-shopping, and e-education are assumed in future forecasts.
52	1/22/04	E-mail	John Suhr	Movable barriers need to be installed on all freeways to accommodate the rush, which can be done now.	Unfortunately, fixed medians and bridge structures make this infeasible in most locations.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

53	1/22/04	E-mail	John Suhr	Telecommuting to work and school should be greatly increased to reduce vehicle trips.	Use of e-connections can reduce the need to travel. Until evidence appears to show a major behavior shift, only a small amount of telecommuting, e-shopping, and e-education are assumed in future forecasts.
54	1/22/04	E-mail	John Suhr	E-government needs to be greatly expanded, changing the government focus from regulation to constructing infrastructure. Most current regulations could be put on the Web and self-enforced - with immense savings that could then be devoted to rebuilding the region without tax increases.	See above comment.
55	1/22/04	E-mail	John Suhr	Virtual schools and universities need to be promoted reducing the need to travel.	See above comment.
56	1/22/04	E-mail	John Suhr	Staggered work hours in localities need to be implemented to disperse arrival and departure times.	The RTP promotes this transportation demand management (TDM) measure.
57	1/22/04	E-mail	John Suhr	Research and select a personal rapid transit (PRT) system and set up a demonstration test line, say from the Santa Fe station to the Zoo, or to the airport, or to the convention center.	A project of this type is not under consideration at this time as a major improvement to relieve peak period congestion.
58	1/22/04	E-mail	John Suhr	Express bus service could be a temporary palliative, but must not usurp existing traffic lanes for exclusive use nor be allowed to override synchronized signal systems - as is proposed in the demonstration project on El Cajon and Park Blvds. The Transit First plan needs to be abandoned and replaced with a People First plan instead.	While Transit First will not be abandoned, the traffic impacts of signal or lane priorities for buses will be evaluated before any implementation.
59	1/27/04	E-mail	Jimmy Knott III	There is a secondary portion of wastewater that was not adequately covered in your report - that of recharging the aquifers versus pumping off the coast. Could this be addressed?	Please refer to comment 60 below.
60	1/27/04	E-mail	Jimmy Knott III	The subject of Biosolids, which are the solid treated organic matter that is left over from safely processing sewage wastewater, is missing from the appendix portion of the RCP. Issues that need to be covered are: treatment requirements, needs in infrastructure; needed land area for storage versus composting; comparative costs involved; processing, and potential revenue generation.	The Wastewater Appendix of the IRIS serves as an inventory of existing wastewater processes and programmed expenditures. Each IRIS appendix is comparable in the topics addressed and the level of detail across all infrastructure areas. The scope of the RCP did not include detailed evaluation of alternative processes and their costs and benefits. The Implementation chapter of the RCP indicates that additional topics will be considered in future updates to the RCP, and these areas could be addressed at a later time pending SANDAG Board direction.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

61	1/31/04	E-mail	Jimmy Knott III	There needs to be as an integral part of this plan a regional comprehensive plan for handling emergency, fire, and disaster types of events.	The scope of the RCP did not include consideration of this topic as a stand alone chapter, but the Implementation Chapter of the RCP indicates that additional topics (including public safety) will be considered in future updates to the RCP. The Urban Form, Healthy Environment, and Public Facilities chapters discuss the need to design communities to facilitate protection from fires, to consider wildfire when designing future developments, and the establishment of a Public Safety Committee at SANDAG to discuss policy issues related to public safety.
62	1/31/04	E-mail	Jimmy Knott III	The RCP should look at the use and development of mobile-manufactured home communities. Discourage the conversion of mobile-manufactured home communities to other uses.	A discussion of manufactured homes was added to the Housing chapter.
63	1/31/04	E-mail	Jimmy Knott III	The RCP doesn't address the need for maintenance of agriculture zones as strongly as it needs to. Regional coordination needs to take place to assure sustenance and provision of goods and agriculture zones are an integral part of this needed plan.	The scope of the RCP did not include consideration of agriculture as a separate topic or chapter. However, the Implementation Chapter of the RCP indicates that additional topics will be considered in future updates to the RCP.
64	2/5/04	E-mail	John Suhr	I hope as part of the RCP and MOBILITY 2030 plans that SANDAG considers synchronized regional traffic signal systems as a way to reduce traffic congestion.	MOBILITY 2030 anticipates synchronized signals improving network efficiency.
65	2/5/04	letter	Steve Apple, City of Solana Beach	Many cities, including Solana Beach, incorporated to provide a more localized governmental forum to address land use issues. Solana Beach strongly supports local land use control and recommends its present authority and decision-making abilities not be usurped.	The RCP is an incentive-based and collaborative plan, and reflects that SANDAG does not possess land use or regulatory authority. For additional emphasis, this point was added to several areas of the plan, including the Executive Summary, the Policy Framework, and the Implementation chapter.
66	2/5/04	letter	Steve Apple, City of Solana Beach	RCP: "Accept more responsibility locally for addressing our regional and subregional infrastructure needs." Comment: credit should be given for hosting regional facilities such as an Amtrak station, an airport, a landfill, etc.	The concept of crediting jurisdictions for hosting regional facilities has not been part of the RCP discussion.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

67	2/5/04	letter	Steve Apple, City of Solana Beach	RCP: "Accept more responsibility locally for addressing our regional and subregional infrastructure needs." Comment: Regional and subregional infrastructure needs should be coordinated efforts that are funded regionally and subregionally, and not city by city. Regional fees consistently applied by each jurisdiction to fund regional and subregional infrastructure are appropriate and recommended.	SANDAG agrees with the need to coordinate efforts when planning for regional infrastructure. With regard to this particular comment, there appears to be a miscommunication. In this context, "locally" means the San Diego region, and does not refer to local jurisdictions. The text has been revised to clarify this point. Additionally in response to the consistent application of regional fees, please see comment #777.
68	2/5/04	letter	Steve Apple, City of Solana Beach	RCP: "Align our infrastructure plans and investments with our RCP goal and objectives." Comment: The City of Solana Beach recommends "carrot vs. stick" funding (i.e., awarding incentive funds rather than withholding base line funds) in the process of distributing funding throughout the region.	The RCP and IRIS share this fundamental perspective, and both recommend the use of incentive-based funding. Additionally, the RCP proposes a new project funding prioritization approach that is consistent with an incentive-based strategy.
69	2/5/04	letter	Steve Apple, City of Solana Beach	RCP: "Provide a variety of affordable and quality housing choices for people of all income levels and abilities." Comment: In built out communities such as Solana Beach (which has less than 20 acres of vacant residential land), credit and consideration should be given for the difficulties in accommodating more density and development than communities with hundreds of vacant acres, as well as the opportunity of using true mixed uses in commercial areas.	The RCP recommends many strategies for increasing the supply of housing in communities with less vacant land, including identifying and developing underutilized sites, as Solana Beach has been doing. In implementing the RCP, existing land use will be taken into consideration.
70	2/5/04	letter	Steve Apple, City of Solana Beach	The City of Solana Beach continues to desire to have the NCTD train station mixed use site to be one of the envisioned SANDAG coordinated "Smart Growth Opportunity Areas."	The definition of smart growth opportunity areas has been refined by existing working groups and the Regional Planning Committee, and has been included in the Urban Form chapter of the final RCP. Areas that reflect characteristics of each smart growth category have been included in the Smart Growth Classification Matrix as potential examples that typify the various definitions of smart growth.
71	2/5/04	letter	Steve Apple, City of Solana Beach	Consideration and credit should be given for existing higher density nearby neighborhoods (South Sierra condominiums and the forthcoming Sillstrop project) as well as respecting built out, less dense single family communities.	The designation of Smart Growth Opportunity Areas will be a collaborative process between SANDAG and the local jurisdictions upon adoption of the RCP. Areas that encompass the characteristics of smart growth categories will be recognized as that process unfolds.
72	2/9/04	letter	James Royle, San Diego County Archaeological Society	The RCP should urge that curation be routinely required countywide. Furthermore, SANDAG could help resolve the legacy problem of extensive uncured collections from earlier public and private projects.	See response to comment #45.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

73	2/9/04	letter	James Royle, San Diego County Archaeological Society	The RCP could suggest a mechanism for shared archaeologist/historian positions between jurisdictions, and SANDAG could organize and provide cultural resources training for jurisdiction staff.	See response to comment #45.
74	2/9/04	letter	James Royle, San Diego County Archaeological Society	Cultural resources need and deserve to be treated in a manner consistent with the treatment afforded other resources in the RCP. Failing to do so has meant that not only are the resources not being considered but opportunities to benefit the public and the various jurisdictions are being overlooked.	The scope of the RCP did not include consideration of this topic. However, the Implementation chapter of the RCP indicates that additional topics will be considered in future updates to the RCP.
75	2/9/04	letter	James Royle, San Diego County Archaeological Society	The RCP could urge other cities in the region to participate in the Mills Act, so that the ability to receive the benefits extends to all owners of historic properties in the county.	See response to comment #45.
76	2/9/04	letter	James Royle, San Diego County Archaeological Society	Cultural resources mitigation techniques could be shared by the various jurisdictions.	See response to comment #45.
77	2/9/04	letter	James Royle, San Diego County Archaeological Society	The RCP should include a requirement to provide adequate funding for, and early evaluation of, cultural resources mitigation in the planning of public infrastructure projects.	See response to comment #45.
78	2/9/04	letter	James Royle, San Diego County Archaeological Society	In Chapter A.8 of Appendix 4 where "cultural resources" appear in the discussion of parks and open space, suggests a misunderstanding that all cultural resources are in parks and open spaces. This most certainly is not the case.	Implying that all cultural resources are in parks and open spaces is not the intent of the section. The discussion emphasizes how the IRIS addresses parks and open space with regards to the goals and objectives of the RCP. It is a statement that parks and open space <i>are</i> a cultural resource valued by the community.
79	2/10/04	letter	Stephan Marks, NCTD	Future road projects should employ a "smart corridor and Transit First" philosophy. SANDAG must ensure that funding for all new roads, and improvements to existing roads, must be built to accommodate efficient present and future transit operations.	Language has been added under Local Circulation Elements for the Regional Significant Transportation Network.
80	2/10/04	letter	Stephan Marks, NCTD	Access to public transportation is important in areas where smart growth can not or will not occur, and that funding is still needed to support these services.	We agree, although the level and frequency of transit service in other areas may be lower.
81	2/10/04	letter	Stephan Marks, NCTD	SANDAG should consider maintaining fare affordability when developing a regional fare policy.	Text change not required.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

82	2/10/04	letter	Stephan Marks, NCTD	It is important to recognize the need to balance both productivity and coverage goals in funding BREEZE and FAST services. As SANDAG considers regional transit planning, the NCTD Board will continue to make the case that local services in North County that may not be as productive as South County services are important to preserve.	Text change not required.
83	2/10/04	letter	Stephan Marks, NCTD	SANDAG should consider how to fund local transit services to keep pace with new development. The new Congestion Mitigation Program requirements could serve as the proper policy mechanism but would require that local jurisdictions adopt a regionwide transportation demand management ordinance.	The proposal of a regionwide TDM ordinance to fund transit services is a major policy decision that presently is left to individual jurisdictions and is beyond the scope of the RCP.
84	2/10/04	letter	Stephan Marks, NCTD	SANDAG should provide incentives for local jurisdictions to adopt a region-wide transportation demand management ordinance.	The proposal of a regionwide TDM ordinance is a major policy decision that presently is left to individual jurisdictions and is beyond the scope of the RCP.
85	2/10/04	letter	Stephan Marks, NCTD	Local data on parking guidelines is needed. Parking management programs will become increasingly important to make smart growth areas work and to make public transportation more attractive.	We agree. This is a new area that will be evaluated as more smart growth development is proposed in the region. Additionally, Strategic Initiative 1.2a calls for the preparation of smart growth parking guidelines.
86	2/10/04	letter	Stephan Marks, NCTD	Transit agencies should be eligible to apply for the proposed Smart Growth Incentive Program.	The Smart Growth Incentive Program will be developed as follow-up to RCP adoption. The eligibility of transit operators will be considered at that time.
87	2/10/04	letter	Stephan Marks, NCTD	SANDAG should encourage local jurisdictions through incentives to adopt as part of their development guidelines, pedestrian and transit-friendly design standards. This is a critical policy and program element and the RCP could be more proactive in this area.	One of the actions in the Urban form chapter is to develop an urban design best practices manual as a model for local jurisdictions. This document will address designing for transit as well as pedestrians. Encouraging local jurisdictions to adopt these design standards will be an implementation task that follows adoption of the RCP.
88	2/10/04	letter	Stephan Marks, NCTD	The RCP should include a focus on ADA accessibility. The RCP could be more aggressive in recognizing that communities and homes need to not be just ADA compliant, but to work to make accessibility features the norm. The RCP should promote the link between accessible housing and accessible transportation.	Although accessibility is discussed throughout the RCP, and is included in many of the goals, policy objectives, and actions, this topic has been addressed more thoroughly in the Transportation, Urban Form, and Housing chapters.
89	2/12/04	E-mail	Ernie Holden	The three big auto makers reported that they will produce 18 million new cars this year, that's not counting the imports. Just adding another lane or two will not be the answer but only add to the traffic congestion problem we already have.	No text change was required.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

90	2/12/04	letter	State Senator Denise Moreno Ducheny	<p>I am concerned that the draft RCP provides little detail regarding its two core elements, the designation of smart growth opportunity areas within each community and the linking of transportation funding to local government progress in creating smart growth opportunities and development in these areas. I understand that discussions regarding these elements are continuing and am extremely hopeful that strong and clear language will be added to the draft to accomplish these goals. In addition, I would strongly encourage SANDAG to make public the details of these core pieces of the RCP as soon as possible so that the larger community can review and comment on the plan before its final adoption in June.</p>	<p>Between the release of the draft RCP, and the preparation of the final RCP, the SANDAG Board of Directors, the Regional Planning Committee, and the Regional Planning Technical and Stakeholders Working Groups refined the definition of smart growth opportunity areas and outlined principles for developing the criteria for future smart growth incentive programs, which are directly related to transportation funding. The final RCP includes the principles for developing criteria for smart growth incentives; the criteria will be developed once funding becomes available. All SANDAG meetings are open to the public, and SANDAG Board meetings are broadcast over the internet.</p>
91	2/12/04	letter	State Senator Denise Moreno Ducheny	<p>I would ask that SANDAG consider incorporating housing affordability criteria into the smart growth opportunity areas which are subject to the linkages with transportation funds. The housing chapter contains a powerful discussion of the lack of affordability in the San Diego region and sets out a program. However, it is not clear that this is connected in any way to the smart growth opportunity areas and the linkages, which form the core of the RCP.</p>	<p>Additional language has been added to the Housing chapter, better connecting it to the Urban Form chapter, which includes the principles for developing criteria for smart growth incentives. The principles call for a particular focus on opportunities for housing affordable to all income levels.</p>
92	2/14/04	E-mail	Theresa Acerro	<p>There are few specifics in this plan; does this come next or are you planning to leave it up to the cities that are already actively creating sprawl?</p>	<p>The Implementation Framework chapter of the draft RCP recognized that it served as a starting point in organizing how the plan's goals, policy objectives, and actions would be carried out, and that a more detailed implementation strategy would be included in the final RCP. The final RCP includes an extensive list of "Strategic Initiatives" or sets of priority actions to implement the actions and concepts contained in the plan. Additionally, note that SANDAG does not have land use or regulatory authority. The RCP is an incentive-based and collaborative plan.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

93	2/14/04	E-mail	Theresa Acerro	The county needs to mandate alternative fuels to reduce the amount of particulates in the air caused by cargo transportation.	The County does not have legal authority to mandate alternative fuels. However, both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (ARB) have the authority to adopt fuel specifications, including requiring lower sulfur content to reduce particle pollution. For example, EPA recently adopted national diesel fuel standards that will lower sulfur content to 15 parts per million (ppm) starting in 2006. By contrast, diesel fuel currently sold in California has an average sulfur content of 141 ppm. Although EPA's regulation will apply only to diesel fuel sold for use in on-road vehicles, ARB is planning a similar regulation that would also apply to off-road vehicles and non-vehicular sources. The change to very-low sulfur diesel fuel will reduce emissions of both particulate matter and sulfur dioxide, and enable a new generation of diesel emission control technologies. Additionally, over the past 20 years a number of measures have been adopted by EPA and ARB to significantly reduce emissions from diesel engines. As a result, particulate matter emissions from new heavy-duty diesel truck engines have been reduced by over 85 percent in the last 10 years. Further, ARB has established a Diesel Risk Reduction Plan, with a goal of a 85 percent statewide reduction in diesel exhaust emissions by 2020. Finally, both the San Diego APCD and ARB have established financial incentive programs to obtain early emission benefits of cleaner fuels and engines in San Diego County. Substantial funding has been allocated via the Carl Moyer Memorial Air Quality Attainment Program, the Vehicle Registration Funds Program, the Lower Emission School Bus Replacement and Retrofit Program, and the Heavy-Duty Diesel Vehicle Retrofit Program, as well as others. Collectively, these programs eliminate thousands of tons of diesel exhaust and ozone-precursor emissions in San Diego County.
94	2/14/04	E-mail	Theresa Acerro	There has to be an emphasis on living wage jobs. An emphasis has to be put on using redevelopment money to give blighted community residents a chance to get what they want for their neighborhoods -- not gentrification, but truly affordable housing and living wage jobs.	The Regional Economic Prosperity Strategy proposes raising our standard of living through creating public policies and infrastructure investment that support the growth of middle-income jobs, and in turn educating and training our local residents to take these jobs. This will allow the region to address poverty and prosperity in a consistent and implementable manner.
95	2/14/04	E-mail	Theresa Acerro	Poverty has to be actively dealt with.	See response number 94 above.
96	2/14/04	E-mail	Theresa Acerro	Rail system sounds great, but will people use it?	The Regional Transportation Plan intends to make rail and public transit competitive with auto as a mode choice.
97	2/14/04	E-mail	Theresa Acerro	Some emphasis needs to be put on reuse and recycling or we will never solve the solid waste problem.	SANDAG agrees. The RCP and Countywide Waste Management Plan (2003) emphasize these approaches.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

98	2/14/04	E-mail	Theresa Acerro	Are you sure there will only be 1 million more people here by 2030? Is this a projection or what you plan to control population growth to?	SANDAG's 2030 Final Forecast projects 1 million more people between 2000 and 2030. Historically, the forecasts have been reasonably accurate. However, it is possible that new information could emerge that would change future forecasts. There are no plans to control population growth.
99	2/14/04	E-mail	Theresa Acerro	I question whether there will be sufficient drinking water.	It is the San Diego County Water Authority's (CWA) mission to provide a safe and reliable supply of water to its member agencies. CWA relies upon SANDAG and its member agencies for forecasted growth projections by which to calculate demands and plan for future water supplies. The Water Authority will implement a diversification strategy that uses a mix of resources to ensure water reliability for future generations including demand management (water conservation), water transfers, local water supplies, and existing imported supplies. For more information on water supply, please see the Public Facilities chapter of the RCP.
100	2/17/04	letter	Cindy Stankowski, San Diego Archaeological Center	The RCP should add a quote from the famous philosopher Odo Marquard, "There is no future without a past."	Thank you for your suggestion; however, no change was made.
101	2/17/04	letter	Cindy Stankowski, San Diego Archaeological Center	The RCP could establish "best practices" for the county as a whole, including the sharing of resources among jurisdictions.	See response to comment #45.
102	2/17/04	letter	Cindy Stankowski, San Diego Archaeological Center	Many projects enacted under the RCP will undeniably require federal funding and permits; therefore, curation of excavated archaeological artifacts will be required under federal regulation 36 CFR Part 79. The RCP should reflect this and include a mandate for curation of excavated artifacts county-wide.	See response to comment #45.
103	2/17/04	letter	Cindy Stankowski, San Diego Archaeological Center	The RCP should include a requirement to provide adequate funding for the curation and interpretation of archaeological collections as part of the mitigation process.	See response to comment #45.
104	2/17/04	letter	Cindy Stankowski, San Diego Archaeological Center	We understand that the preservation of cultural resources will be addressed in the RCP Environmental Impact Report, but the topic deserves much higher prominence in the RCP text.	See response to comment #45.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

105	2/18/04	letter	Tom Smisek, City of Coronado	The RCP is a complex document that should encourage acceptance of region-wide goals and policies that will have beneficial impact on the nature of future development in the region. The City Council is confident that the RCP represents an effort to cooperatively assure a better future for our region and its residents by encouraging "Smart Growth" in the region that is similar to what has historically occurred in Coronado.	We agree. No text change was made to the RCP based on this comment.
106	2/19/04	letter	Marsi Steirer, City of San Diego	Draft Iris Technical Appendix, Section 2 [A.2] states that the City of San Diego is the largest member agency of SDCWA and 55% of the water delivered annually to the San Diego region by SDCWA goes to the City of San Diego. According to the SDCWA Annual Report 2002 - page 41, the City's imported use (calculated) for fiscal years 1998-2002 is approximately 33-37 percent of the water delivered to the San Diego region.	Paragraph was changed to read "33-37 percent."
107	2/20/04	letter	Jan Sobel, Carlsbad Chamber of Commerce	Flexibility with regional financial support needed to assist communities that have existing local and zoning plan conflicts with the goals of RCP i.e. increase in density along transportation corridors/downtown areas of Carlsbad above current allowed levels.	The definitions of smart growth opportunity areas and the smart growth incentive program have been refined, and are included in the final RCP. The RCP recognizes that smart growth is not a "one-size fits all" approach.
108	2/20/04	letter	Jan Sobel, Carlsbad Chamber of Commerce	The plan should focus on new issues that affect future development of our region, both residential and business/employment, rather than overemphasizing fixing past problems.	Given that the region consists of significant existing development and that we are running out of land for large-scale residential development, the RCP attempts to take a balanced approach to issues regarding future and past development.
109	2/20/04	letter	Jan Sobel, Carlsbad Chamber of Commerce	Public education of environmental concerns needs regional financial support.	The RCP recommends a program to educate the community about the impacts of our daily activities on the water quality of the ocean and other bodies of water. This takes funding which has not been secured.
110	2/20/04	letter	Jan Sobel, Carlsbad Chamber of Commerce	Caution is necessary when suggesting funding mechanisms for infrastructure so as not to burden just the new homeowners but everyone who is the beneficiary of the improvements.	We have looked into this suggestion, and incorporated it where appropriate.
111	2/20/04	letter	Jan Sobel, Carlsbad Chamber of Commerce	Distribution of any transportation funds needs to address North County in a fair and equitable way with more than 1/3rd of the countywide population plus the South Riverside commuters, North County's road network is clearly deficient, having inadequate regional east-west and north-south alternatives.	This is beyond the scope of the RCP.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

112	2/20/04	letter	Jan Sobel, Carlsbad Chamber of Commerce	The RCP should contain incentives to encourage employment for our region in order to improve the jobs/housing balance in the North and South County regions, reducing peak hour commutes to the traditional job centers in mid-county area.	The RCP proposes a policy framework developed to, among other things, foster a more balanced distribution of jobs and housing through coordinated and collaborative planning efforts at the subregional level.
113	2/23/04	letter	Christopher Terzich, SDG&E	SDG&E would appreciate SANDAG's consideration in including SDG&E as a team member in the development and implementation of the RCP.	The SANDAG Board recently approved the formation of a regional Energy Working Group that makes recommendations on energy issues to the Regional Planning Committee. SDG&E is represented on the working group.
114	2/23/04	letter	Christopher Terzich, SDG&E	Draft policy which can be used to meet Policy Objective 1: Landscape trees, shrubs and groundcover associated with new development or redevelopment around existing and planned gas and overhead or aboveground electrical facilities should conform to SDG&E's landscape guidelines.	The Regional Comprehensive Plan does not make specific site development recommendations that are the authority of the local land use agencies. Coordination between SDG&E and local jurisdictions to ensure compatibility of new development and redevelopment around existing or planned gas and overhead or aboveground electrical facilities would be necessary to ensure compatibility with SDG&E's landscape guidelines.
115	2/23/04	letter	Christopher Terzich, SDG&E	Because the built environment requires energy resources to operate and energy facilities require physical space to produce and convey this critical commodity, energy facilities should be considered a type of land use that requires integration into our land use planning efforts, specifically, natural gas and electrical facility planning.	The Regional Comprehensive Plan does not include a regional land use plan and is intended to encourage those agencies that do have land use authority to consider compatibility with adjacent land uses in the planning process.
116	2/23/04	letter	Christopher Terzich, SDG&E	Draft policy which can be used to meet Policy Objective 1: Development located within or adjacent to multiple species habitat plan preserve areas, adjacent to overhead electrical transmission lines and/or easements should incorporate additional open space buffers to maintain a minimum 400-foot width along transmission lines routes in areas that would provide connectivity between designated or planned open space multiple species preserves.	This comment references requirements that are outlined in the implementing agreements signed by each jurisdiction that has take authority through the adopted habitat preservation plans in the region.
117	2/23/04	letter	Christopher Terzich, SDG&E	Draft policy which can be used to meet Policy Objective 1: Residential development proposed adjacent to other overhead electrical transmission lines and/or easements should incorporate additional open space, non-building area or rear yard setbacks to provide greater buffering from the transmission facilities.	Local land use authorities have to weigh issues of proximity to transmission facilities when formulating zoning requirements. The RCP does not make specific recommendations for site development and land use planning, rather encourages regional land use compatibility and measures to maximize the relationship of land use designation and transportation facilities.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

118	2/23/04	letter	Christopher Terzich, SDG&E	Draft policy which can be used to meet Policy Objective 1: Additional open space or non-building area buffer should be integrated into new residential development or redevelopment located adjacent to existing or planned energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities.	See comment above.
119	2/23/04	letter	Christopher Terzich, SDG&E	Draft policy which can be used to meet Policy Objective 1: Redevelopment plans, community plan updates, general plan amendments, new master plans or similar larger scale developments that are located one mile or more from and existing substation should contact SDG&E to determine whether a set aside area of a minimum of two acres net usable pad area is necessary to accommodate a new substation facility based on increased electrical demand. The set aside area for the substation site should be located adjacent to proposed major arterial roadways and intersections and /or existing or planned electrical transmission rights of way. Also, additional right-of-way/ corridor area for any necessary extension of transmission lines/facilities to serve the substation should be integrated into the plans. Coordination with SDG&E as to the location and size of the set aside area is essential and should be completed early in the process of formulating the plan, update or amendment. The set aside area can be designated with appropriate alternate land uses in the event the site is not needed for utility use.	SANDAG's Technical Working Group (TWG) that makes recommendations to SANDAG's Regional Planning Committee could be a forum for SDG&E to discuss these issues. Though the recommendations in the comment are too site specific for inclusion in the RCP, the TWG consists of planning and community development directors that would be the appropriate audience to discuss such issues.
120	2/23/04	letter	Christopher Terzich, SDG&E	Draft policy which can be used to meet Policy Objective 1: Appropriate secondary land uses should be encouraged to be located within overhead transmission facility rights-of-way when appropriate and could include natural open space, passive parkland, plant nurseries, parking lots, private roads, access ways and driveways based on final review and approval of SDG&E. Trails can also be included as a secondary land use as long as proper indemnification, funding and maintenance language is set forth in a written agreement between SDG&E and the agency and project developer.	SANDAG's Technical Working Group (TWG) that makes recommendations to SANDAG's Regional Planning Committee could be a forum for SDG&E to discuss these issues. Though the recommendations in the comment are too site specific for inclusion in the RCP, the TWG consists of planning and community development directors that would be the appropriate audience to discuss such issues.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

121	2/25/04	Mtg. Comment	Integrated Waste Mngmt Citizens Advisory Comm.	Not having a regional planning agency to make sure that the cities and the county implement the waste management actions in the RCP is a major problem. Someone at the regional level has to monitor whether or not the cities and the county are going to implement these initiatives. Who is tasked with the accountability? The RCP needs accountability and something that can be measured in this area of the RCP.	The revised Implementation chapter includes Strategic Initiatives, including lead agencies, and timeframes for completion. The revised Performance Monitoring chapter identifies indicators to track progress. SANDAG will collect and report on the indicators on an annual basis, and work with lead agencies to promote implementation.
122	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p.8) The definition of Smart Growth should include the phrase "while protecting open space and natural resources."	The smart growth definition has been revised to reflect this comment.
123	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p.8) Under the Smart Growth Principles: Environment, it is acknowledged that new development of any kind should "provide environmentally sensitive development that conserves water and energy, protects water quality, and promotes the use of alternative energy sources." We propose the addition of "protects sensitive plants and habitats, and restores and preserves natural open spaces through the use of native plants in landscaping."	Concepts were incorporated as suggested.
124	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Population growth in the San Diego region may not be particularly beneficial to the quality of life of the people already living here. Some of our members fear that population increases would mean reductions in the quality of life for current residents. Although SANDAG studies of attempts to slow population growth show that standard means are not successful, further studies of methods used by other jurisdictions might help San Diego develop population-slowing methods if found necessary to preserve quality of life.	SANDAG does not contemplate preparing additional growth-slowing studies in the near future. No text changes were made to the RCP based on this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

125	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	There is also the issue of decreasing populations. The San Diego region has experienced this in the past, most recently in the early 1990s. The RCP should be capable of accommodating all types of population changes, providing methods for upgrading existing buildings, roads, and dwelling units in a manner that continues to preserve the quality of life and protect the environmental values of the region. Some regions of this country, which have experienced population and job losses over the past thirty or so years, are those that have also experienced extensive rural sprawl and degradation of their inner cities, e.g., Cleveland OH, St. Louis MO. We need to provide a plan that adapts to the various economic possibilities of the future.	The RCP recognizes that domestic migration fluctuates yearly, usually based on the condition of the local economy. For instance, during the recession of the 1990's, net domestic migration was in fact negative. Foreign migration, on the other hand, is not as sensitive to the local economy (Evaluation of Growth Slowing Policies for the San Diego Region, SANDAG, 2001), and average annual growth remained positive. Our region already is growing at a slower average annual growth rate than that of all of our surrounding areas. Given our geographic location and the growth pressures within our region and beyond our borders, it is unlikely that our region will lose population in the near future. However, the RCP is intended to be a living document updated every three to five years, and can be revised to reflect changes in population trends as necessary.
126	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	The actions described here for increasing our use of native plants throughout the region are excellent and should be incorporated into implementation plans and indicator measurements.	The set of Strategic Initiatives included in the updated Implementation chapter calls for the preparation of guidelines for protecting natural habitats in urbanized areas, and for the use of native vegetation in urban landscapes. The implementation of this Strategic Initiative will be monitored over time as a "performance indicator" as described in the revised Performance Monitoring Chapter.
127	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 4) In Figure 1-2 the locations of the developable land need to be more clearly identified, perhaps by the use of color or circles surrounding the indicated areas.	Comment noted, and text was changed to more clearly explain what is being portrayed in the figure.
128	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 9) We like the 2030 Vision statements. They reflect a picture of the best of all possible conditions. But in order to meet these "dreams", we must be strict in our regional development allowances. Otherwise we will be cemented across the region with no place left for nature. We should look to other models and lifestyles for examples of different lifestyles, such as Europeans, that if adopted here could reduce sprawl and high-energy use.	One of the goals of the RCP is to prevent being "cemented across the region." The RCP emphasizes strengthening the connections between local and regional planning and providing incentives for smarter and more sustainable growth. The RCP promotes less land consumption and more energy conservation.
129	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p.7) Basic elements of urban design includes "Mixed land uses..." Please be more specific about the meaning of mixed land uses.	Definition is included in the Glossary of Terms.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

130	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Figure 4D-1. Since the shades of gray used in this graph are difficult to distinguish it would be more useful to put the percentages next to the vegetation type. Location of San Diego Mission Bay is unclear in the graph, which should list both Mission Bay and San Diego Bay. RCP appears to focus primarily on terrestrial environment. Aquatic- coastal, bays, and estuarine- habitats are vitally important as well.	Figure 4D-1, the Generalized Vegetation map for the western San Diego Region, has been printed in color rather than shades of gray. The percentages of vegetation type are listed in the text.
131	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 99) The policy objective should include preservation and maintenance of natural topography, which supports the native plants and animals. SANDAG can take direct action to help achieve this policy objective by insuring that transportation corridors do not impact core habitat areas, linkages and wetlands. SANDAG should review the Regional Transportation Plan to identify proposed roads and other transportation corridors that impact core habitat areas, linkages and wetlands. Proposed roads and other transportation corridors that impact core habitat areas, linkages and wetlands should be dropped from the Regional Transportation Plan or given the lowest priority for funding.	An action has been added to the RCP to assure coordination and cooperation on planning and implementation of future transportation and habitat preserve infrastructure systems, and this action is included in SANDAG Overall Work Program for Fiscal Year 2005.
132	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	It is recommended that the following action item be added: 5. Ensure that the Design Guidelines for wildlife corridors and habitat linkages from the Biological Goals, Standards, and Guidelines for Multiple Habitat Preserve Design in Section 6, especially as they relate to roads (p. 6-4,item 8), are adhered to in transportation plans.	An action was added to the final plan to reflect the intent of this comment.
133	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Urban canyons and landscapes. (p. 98) Enhancement projects for degraded areas should be promoted. The Sierra Club Canyons Campaign and the City of San Diego Chollas Creek enhancement project are examples. Assignment of responsibility for these urban open spaces and funding for regular maintenance and management needs to be established.	Urban canyons that are part of the MSCP or the MHCP will be managed according to those plans. In some cases, these plans have identified the funding needs of specific degraded areas. Degraded areas not included in the MSCP and MHCP need further analysis by the appropriate jurisdiction.
134	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	It is recommended that the following action item be added: Furthermore, secure funding for the acquisition, maintenance, management and monitoring of the urban canyons and natural landscape areas.	SANDAG is proposing an environmental mitigation program to partially fund the regional needs of the multiple species/habitat conservation plans. Urban canyons and natural landscape areas that are not part of the conservation plans are the responsibility of the individual jurisdictions.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

135	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	We urge SANDAG to convene the MHCP Stakeholders Subcommittee to bring all concerned parties to the table to help insure that the MHCP subarea plans are completed in a timely manner and that the MHCP meets its objectives.	This is a specific requirement of the Multiple Habitat Conservation Program and outside the scope of the RCP.
136	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Habitats for mitigation offsets are becoming scarce countywide. RCP should assess the availability of and quality of habitats (terrestrial and aquatic) for mitigation offsets.	The RCP provides a generalized discussion on the need to protect natural habitats; assessing the quality and quantity of habitat land for mitigation offsets is beyond the scope of the RCP.
137	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Funds are required for preserve acquisition, management and monitoring. Regional funding sources need to be identified. The funds available for environmental projects from the possible extension of the TransNet tax are likely to be insufficient to meet the MHCP requirements. This is a critical issue and needs immediate attention.	SANDAG is committed to securing regional funding for the habitat conservation plans either through TransNet or some other regional source. The RCP includes an action to secure regional funding for habitat conservation plan implementation.
138	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	It is recommended that the following action item be added: Each of the preserve plans must contain "enforceable" language.	The MSCP and the MHCP subregional plans have been written and adopted according to the state and federal endangered species acts and the NCCP Act. It is beyond the scope of the RCP to list all the requirements or language suggestions for the habitat plans.
139	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	The title of this section (Economic Prosperity) is counterintuitive. We already live in the highest standard of living zone in the world. We do not need to raise the overall standard of living, we need to Create Opportunities for Economic Equality for All Residents of the Region.	Relative to other areas of the world, it is true that our region's standard of living is considerably higher. However, this does not mean we should not continue to strive to improve our regional standard of living. Furthermore, the Economic Prosperity chapter emphasizes the role of education and training as a way to improve economic equality within our region. Excellent workforce development efforts are a crucial component of the regional economic prosperity strategy because they create opportunities for local residents to attain the types of jobs we hope to create. This, in turn, provides an opportunity to improve our standard of living across all income categories, especially for those segments of the population who may not have actively participated in the growth of the regional economy.
140	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Septic systems have not been but should be addressed in this section. Information on the number and location of the current and planned septic systems should be provided. Also, the issue of whether septic systems should be permitted in a given location or whether the sewage should be treated by a wastewater treatment plant in order to safeguard public health and water quality needs to be addressed.	Comment noted. Most, if not all, septic systems are located in rural areas planned and served by the County of San Diego. Septic systems are primarily a local planning issue and a detailed discussion of them is beyond the scope of the RCP.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

141	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	By 2030, major changes in the communication technology will require planning to accommodate the necessary infrastructure. The infrastructure will have land use impacts. The proliferation of cell phone antennae already pose land use conflicts.	The scope of the RCP did not include consideration of communications technology. However, the Implementation chapter of the RCP indicates that additional topics will be considered in future updates to the RCP. Additionally, SANDAG views cell phone antennae and related infrastructure needs as local issues to be addressed by local jurisdictions.
142	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Use technology to help efficiently and effectively move people and goods. Examples: carbon tax; volunteers green tax; timed signals; video monitoring busy highways and intersection and instantaneously reporting results to the Internet; fuel cell cars as transport vehicles; electric trains and trolleys; convert internal combustion engines to use hydrogen instead of gasoline; busses that fill the gaps until trolleys are in hydrogen; subsidize hydrogen with carbon tax collected.	Both the RTP and the RCP promote expanding technology to improve the efficiency of the transportation network and remove some trips from the system.
143	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	It is necessary to carefully consider the locations of additions to our transportation systems, such as building another airport, adding rail lines and expanding the ports, to ensure that they serve only highly developed areas of the region and do not encourage sprawl development.	The goals and objectives of MOBILITY 2030 and the RCP discourage transportation facilities that might induce growth in areas not already planned for such growth by local jurisdictions.
144	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	SANDAG is developing their own energy board that will advise on energy issues. The Sierra Club recommends that the board be staffed with knowledgeable experts in air quality, new technology, energy pricing, generation and the grid. We know that this expertise is available in the retired community and recommend that be the source for staffing.	In December 2003, SANDAG established the Energy Working Group that advises SANDAG on issues related to the coordination and implementation of the San Diego Regional Energy Strategy adopted by the SANDAG Board of Directors in July 2003. The working group consists of elected officials from the San Diego region as well as stakeholders representing business, energy, environment (including the Sierra Club), economy, education, and consumer interests. SANDAG is currently identifying resources to be able to utilize the expertise referenced in the comment.
145	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Building Departments in every community in San Diego County should be part of the solar energy solution through their permit and planning departments. Building Departments should have specialists that are expert in efficiency and renewables. Permit fees need to be standardized.	Comment is consistent with the actions in the Energy section of the Public Facilities chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

146	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	We need to explore the potential of the Mexicali to Tijuana power line being used as a backup for San Diego County, thereby reducing the need for the proposed Valley Rainbow line in the Cleveland National Forest.	Comment is consistent with Action #3 (Planning, Design and Coordination) of the Public Facilities chapter. SANDAG is creating opportunities to coordinate energy supply strategies between governments in the border region. SANDAG's Energy Working Group is currently developing a work program to implement the Regional Energy Strategy which recommends strong border coordination.
147	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Contractors need an education that will assure the buying public that they will be getting the quality they pay for. Organizations such as the US Green Building Council, REO, SDG&E and trade unions can provide that training.	This is beyond the scope of the RCP.
148	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Solar thermal can provide hot water for swimming pools, showers, cooking and cleaning for residential and business. These self debt-servicing solar systems should be on every public building that consumes energy. A study or review by experts of every business or residence should be reviewed for it's solar and efficiency potential. Again the Green Building Council, REO and trade organizations can help.	Increased use of renewable energy is a goal of the Regional Energy Strategy, and is included in Action #1 (Program and Project Development and Implementation) of the Energy section of the Public Facilities chapter.
149	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Wind power is available in the desert and mountains between San Diego and Yuma Arizona. We need to encourage wind generation and provide the grid necessary to move this energy into our area if wind is sufficient for generation. The right of way and towers are in place and lines should be added as needed.	Increased use of renewable energy is a goal of the Regional Energy Strategy, and is included in Action #1 (Program and Project Development and Implementation) of the Energy section of the Public Facilities chapter.
150	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Every new homebuyer should have the opportunity to do energy efficiency and renewables, such as photovoltaic (PV). It is essential that the purchase of a PV system provide the buyer with a method to recapture the value of the efficiency and renewable assets when the ownership changes. That methodology is being developed.	Increased use of renewable energy is a goal of the Regional Energy Strategy, and is included in Action #1 (Program and Project Development and Implementation) of the Energy section of the Public Facilities chapter.
151	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Education is necessary for the home buyer to make decisions on the appliances, HVAC, weatherproofing, windows, insulation, automated energy controls, time of use meter and solar. Every new home should be provided the opportunity to install solar based on the number of bedrooms in the home. The "rule of thumb" is 1.5 kW per bedroom (approximately 675 kWh per month for a three bedroom home) will assure that a fair portion of the energy consumed in that home will be from renewable energy.	Increased use of renewable energy is a goal of the Regional Energy Strategy, and is included in Action #1 (Program and Project Development and Implementation) of the Energy section of the Public Facilities chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

152	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Future LNG (Liquid Natural Gas) plants be located offshore for environmental and safety reasons.	The RCP does not make specific recommendations on these facilities.
153	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Every five years a fresh look at the process should be reviewed, while we struggle through this deregulation period.	SANDAG intends to collaborate with the San Diego Regional Energy Office to periodically update the San Diego Regional Energy Strategy.
154	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 21) We very strongly support this goal: "To build and manage a transportation system that provides mobility and equity to all of the region's residents." However to accomplish this goal it is clear that we must develop methods to reduce our reliance on private automobiles.	Agreed, and the RCP discusses the importance of providing alternative transportation choices.
155	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p.15) The RCP does not present alternative scenarios for future growth in the area. The San Diego region is projected to grow by almost a million more people by 2030. This is one projection; a good plan includes alternative scenarios for the future. We would like to see several alternatives, based on other reasonable population projections.	The RCP does, in fact, present alternative growth scenarios, as described in Chapter 4, the Regional Planning and Policy Framework. Additionally, Chapter 3, Overview, discusses the results of SANDAG's analysis of growth slowing policies, conducted in 2001. The 2001 analysis included recommendations for proactive family planning actions by non-profit and other organizations.
156	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	The shoreline protection should include a discussion on the <i>California Coastal Sediment Management Master Plan</i> that is currently under development. Sediment quality and suitability for beach replenishment must be addressed.	SANDAG is participating in the development of the California Coastal Sediment Master Plan. The San Diego region is unique from other areas of the state because we have an adopted shoreline preservation strategy that will guide future beach restoration efforts which will take into account sediment quality and suitability. Comment is noted and the recommendations of that plan have been reviewed by SANDAG's shoreline preservation committee and incorporated into the Shoreline Preservation section of the Healthy Environment Chapter as appropriate.
157	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Coastal protection focuses only on shoreline preservation. Protection of estuaries, marine ecosystems, needs to be included. Power plants in the past have located on the coast because of access to the seawater for power plant condenser cooling. As the seawater is drawn into the power plant, marine life, fishes, fish larvae and other marine life are killed. Mitigation measures to reduce the kill to acceptable levels are difficult and expensive. The development of dry cooling technology now means that power plants no longer require seawater cooling. Consequently, power plants should not be located on the coast and certainly not in San Diego Bay.	Comment noted. SANDAG has recently completed a collaboration with the California Coastal Conservancy on the Nearshore Habitat Inventory which is a comprehensive GIS database aimed at providing a regional scale inventory of sensitive habitats in the nearshore environment. Comment regarding dry cooling power plants is noted. SANDAG is collaborating with energy stakeholders through the Energy Working Group to discuss issues of power generation, transmission, and other related issues contained in the Regional Energy Strategy.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

158	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	With our increasing understanding of shoreline and marine habitats, and the availability of the San Diego Near shore Habitat Inventory, we should develop a procedure for careful regional evaluation of projects proposed for land adjacent to the ocean for their propensity to damage these sensitive habitats. This evaluation could be assigned to a regional body that would act to preserve regional values in a similar manner to the California Coastal Commission actions to protect State values.	Environmental Analyses are required to determine a project's direct and indirect impacts which could include impacts to nearshore coastal habitats. SANDAG's collaboration with Scripps Institute of Oceanography and the California Coastal Conservancy to develop the Nearshore Habitat Inventory provides the data that are needed to determine which resources may be impacted by land based projects at a regional scale. However, it should be noted that the database is intended to be used for regional decision making and is not mapped at sufficient detail to determine project-specific impacts.
159	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	We should take property out of circulation by holding title and refusing to sell to developers that do it for profit. Our urban canyons and open spaces must be dedicated as open space to protect them from development.	Through "land banking," jurisdictions can purchase land to be used for affordable housing. A discussion of landbanking, and a corresponding action, have been added to the Housing chapter. The natural habitats section of the Healthy Environment chapter includes an action to preserve natural areas in urban areas, such as canyons.
160	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p.18) Affordable housing is lagging exponentially in our community. Provide rewards to those communities that provide such housing, such as transportation dollar priorities.	Principles for smart growth incentives have been added to the Urban Form chapter, and reflect the desire to reward communities that provide higher intensities and affordable housing within smart growth areas. Additionally, text has been added to the Housing chapter cross-referencing the text in the Urban Form chapter.
161	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Reservoirs should be separated from the natural resources. This is not to say that they do not deserve full attention to protect the water quality.	Reservoirs have not been separated from the other water bodies; however, the text has been amended to clarify.
162	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Page 108. The correct name of the state agency responsible for water quality is the State Water Resources Control Board, not the State Water Quality Control Board.	The text has been amended to reflect this comment.
163	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	The section on water quality must include the Clean Water Act impaired water bodies Section 303(d).	The 303d map was inserted into the water quality section of the Healthy Environment chapter.
164	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Intergovernmental Coordination (p. 109) The potential impacts of onsite wastewater treatment such as septic tank systems in the rural areas on water quality and public health from both current and planned housing must be addressed. The alternative to require community wastewater treatment plants in the cases where septic systems are either not suitable or desired should be addressed.	A discussion on wastewater treatment, such as septic tank systems, is not appropriate for the "Intergovernmental Coordination" section. However, the "Wastewater" section of the Healthy Environment chapter has been amended to incorporate this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

165	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Funding (p.111) Currently there is no specifically dedicated source of revenue for storm water infrastructure...consider having developers fund this. Although this could increase the already high costs of housing, alternatively, additional infrastructure costs could lead to more efficient development of smaller homes on smaller lots.	The Integrated Regional Infrastructure Strategy (IRIS) suggests that stormwater issues need to be addressed comprehensively in the region, but does not recommend a specific method of treatment. Instead, the IRIS suggests that the region needs a comprehensive master plan for stormwater management, which might include consideration of whether or not a stormwater fee or other dedicated source of revenue for stormwater infrastructure is appropriate.
166	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Policy Objectives (p.112) 2. "Reduce or eliminate pollutants in our region's water bodies" is an ambiguous and unacceptable statement. The Clean Water Act goal is the elimination of pollutants from the waters of the U.S. The National Pollution Discharge Elimination System, NPDES permit process has this goal. The RCP policy objective should be to <i>eliminate</i> pollutants from our region's water bodies.	Although the Clean Water Act and the NPDES permit process state "elimination" as the goal, "elimination" has not been achieved to date. Therefore, it is still necessary and important to reduce or eliminate.
167	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	To fully understand the regional aspects of water quality and the sources of various pollutants, the water quality discussion should include not only the hydrologic cycle (Figure 4D.3- Hydrologic Cycle) but also models that add information concerning the transfer of anthropogenic contaminants that enter the environment into the watershed.	The transfer of anthropogenic contaminants (impurities and pollutants caused by human activities) was not added to the text of the Water Quality section of the Healthy Environment chapter of the RCP. The information provided in the plan is more general and does not include the level of specificity included in this comment.
168	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Urban Runoff (p.110) It is imperative that land use plans and urban design include best management practices to prevent urban runoff before development takes place. Source control is the first line of defense. Current practice is to develop first then attempt to mitigate urban runoff. This often leads to "end of pipe" solutions that are contrary to the basic principle of source control of the pollutant. Increased density may require local runoff control measures but this will require local cost sharing to pay for these measures. The question of who is responsible, private or a public agency, to maintain these local runoff control measures in perpetuity needs to be addressed.	Local jurisdictions, under the NPDES permit, are ultimately responsible for maintenance of local runoff control measures. Private or public agencies that are issued permits by the jurisdictions must comply with those permits and may be subject to fines; however, jurisdictions themselves are responsible because they are required, under the NPDES permit they were issued, to enforce the permits they issue.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

169	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Don't we need a PUBLIC SAFETY CHAPTER at this point? One paragraph about Park, libraries, police, fire and hospitals is pretty weak for something called a Regional Comprehensive Plan. Public safety needs are clearly related to land use patterns and there are regional fire and law enforcement needs and agencies. An ARJIS summary should be pulled in as part of a Chapter on public safety. The RCP should be the one place that a citizen could go to get the summary of all Regional Level planning and agencies and that includes public safety and documenting the network of agencies involved. But also some discussion about the relation between land use patterns and public safety is warranted within the existing Chapters.	The Urban Form chapter includes a discussion on the relationship between land use patterns and public safety. The scope of the RCP did not include consideration of a public safety chapter. However, a brief description about SANDAG's new Public Safety Committee has been added to the Public Facilities chapter of the RCP, and the addition of a Public Safety chapter will be considered in future updates to the RCP.
170	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 112) 3. "Protect our region's wetlands" is certainly a valuable Policy Objective. However, unless we have an active conservation program specifically addressing wetlands, it appears to be too easy to overcome wetlands regulations in the context of land use decisions. Let us change the policy objective to "Prepare a regional wetlands conservation program, identifying and targeting critical wetlands for conservation." Results from such a program are critical for intelligent land use and transportation planning and can be easily catalogued in the Implementation Program.	Policy Objective 1 of the water quality section of the Healthy Environment chapter has been amended to include wetlands. We agree that wetlands are an important part of the ecosystem; however, since wetlands are regulated by federal and state agencies, SANDAG does not see the need for a regional wetlands conservation program at this time. Federal and state agencies have policies mandating avoidance and minimization of impacts. If impacts do occur, no net loss of wetland functions or values would be permitted.
171	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	Current development practice using massive grading of natural terrain and soil compaction is highly destructive of the natural soils. Compacting soil reduces the soil permeability. Grading native soils removes the valuable and complex subsurface ecosystems. Protecting the native soils has largely been ignored.	This is beyond the scope of the RCP. Grading practices and regulations are the responsibilities of local jurisdictions. The habitat conservation plans strive to protect native plants and native habitats.
172	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 31) Noise pollution must be addressed, especially in higher density areas. Noise sources should be identified and mitigation measures planned. Examples of noise sources that can become a problem in higher density areas: transportation corridors, rail transport, concentration of motorized vehicles; airplanes and helicopters; motorcycles, autos, buses, trucks without adequately muffled exhaust; power lawn mowers, leaf blowers, carpet cleaning equipment; high density housing sources of noise; pets; entertainment facilities, clubs, bars, located with in mixed use commercial/residential areas.	Noise impacts associated with the RCP are addressed in the Environmental Impact Report (EIR) that was prepared for the RCP. The EIR identifies potential impacts associated with increased densities adjacent to transportation corridors and outlines mitigation measures that would reduce impacts to below a level of significance.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

173	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 31) Mitigation of noise should result from strict enforcement of noise abatement. Architectural and building codes for reducing noise must be developed and implemented.	Noise issues are addressed in Noise Elements of local general plans. Noise attenuation should be considered during the design of projects to minimize impacts to sensitive noise receptors. In addition, regional impacts associated with implementation of the RCP are addressed in the RCP EIR.
174	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 31) Land use plans need to assure noise source control compatibility in mixed residential/commercial zones.	Noise issues are addressed in Noise Elements of local general plans. In addition, regional impacts associated with implementation of the RCP are addressed in the RCP EIR.
175	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 31) Life style changes should educate the public to be thoughtful of the impacts of their actions, without this "smart growth" will fail due to increased stress levels in the public. Public education to promote noise control is essential.	Noise issues are addressed in Noise Elements of local general plans. Noise abatement public education strategies are beyond the scope of the RCP.
176	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 48) Ensure that growth is kept away from rural areas by requiring a demonstration that there are adequate water supplies for any proposed development based on the most recent information of groundwater recharge rates.	Local jurisdictions, including the County of San Diego, are responsible for ensuring that proposed development projects have adequately addressed water supply issues. SANDAG works with the County Water Authority, local water districts, and local jurisdictions to forecast future population growth and land use distribution to ensure an adequate supply of water for the region.
177	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 48) Agricultural uses should also be required to demonstrate that adequate water supplies are available for their projected needs.	Local jurisdictions, including the County of San Diego, are responsible for ensuring that proposed projects, including proposed agricultural uses, have adequately addressed water supply issues. SANDAG works with the County Water Authority, local water districts, and local jurisdictions to forecast future population growth and land use distribution to ensure an adequate supply of water for the region.
178	2/26/04	letter	Janet Anderson, Sierra Club, San Diego Chapter	(p. 48, policy objective 5) Expand this policy objective by suggesting methods to facilitate redevelopment and infill development such as permitting priorities, density bonuses, and reduced parking requirements.	This suggestion has been incorporated into the discussion of smart growth incentives that has been added to the Urban Form chapter of the final RCP.
179	2/26/04	letter	Michael Ott, LAFCO	SANDAG will serve as the lead agency in developing guidelines for the service providers to better coordinate their Master Plans with the goals of the RCP. Once the guidelines are in draft form, LAFCO staff will provide comments. The Special Districts Advisory Committee should be involved to provide additional input.	SANDAG's role as the lead agency is reflected in the Strategic Initiatives included in the revised Implementation chapter. Suggestion to involve the Special Districts Advisory Committee is noted, and will be taken.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

180	2/26/04	letter	Michael Ott, LAFCO	Existing Local Plans and Programs (p. 23) - The role of LAFCO's Municipal Service Reviews, in terms of pulling together special district's Master Plan information dealing with infrastructure planning, financing, and coordination with land use planning, should be mentioned.	No text change we made.
181	2/26/04	letter	Michael Ott, LAFCO	Implementation Approach (p. 28, 48) - It appears that the Smart Growth Incentive Fund would be utilized exclusively for transportation-related development projects that support smart growth as a part of MOBILITY 2030. LAFCO encourages SANDAG to expand the use of the pilot Smart Growth Incentive Fund to include all local service providers that support smart growth policies. This would provide incentives for special districts to direct development to infill areas prior to undeveloped areas that would require new capital facility investment.	The Smart Growth Incentive Program will be developed upon adoption of the RCP. The eligibility of local service providers will be considered at that time.
182	2/26/04	letter	Michael Ott, LAFCO	Water Supply: Tribal Government Perspective (p. 194) - SDCWA regulations contain prohibitions on providing CWA water to areas outside of the CWA boundaries or to non-CWA member agencies. Contractual service agreements between special districts and third parties are subject to LAFCO review and approval.	This comment was placed as a footnote for clarification purposes, quoting LAFCO as the source.
183	2/26/04	letter	Michael Ott, LAFCO	Water Supply Actions: Planning, Design, and Coordination (p. 195) - Action #6 is stated as "Analyze and address the potential impacts of water supply infrastructure investments on surrounding communities." The LAFCO Municipal Service Review is one of the appropriate existing venues to perform this function, which should be mentioned in the section.	LAFCO has been included as one of the "Lead Agencies" for this action.
184	2/26/04	letter	Michael Ott, LAFCO	Infrastructure Summary (p. 263) - This section should mention the LAFCO Municipal Services Review (MSR) and Sphere of Influence (SOI) update process, which is required by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, that utilizes SANDAG growth projections to examine each city/agency's CIP and SOI.	Comment noted and has been incorporated into the IRIS chapter.
185	2/26/04	letter	Michael Ott, LAFCO	Policy Objective #4 - This objective is a specific aspect of LAFCO purview and is covered by one of the 9 required determinations of the LAFCO Municipal Service Review process. Therefore, the actions to accomplish this objective should specifically mention the need for coordination with LAFCO.	Comment noted and has been incorporated into the IRIS chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

186	2/26/04	letter	Michael Ott, LAFCO	Planning and Design Action #2 (pgs. 270 & 303) should be revised to state, "...of a facilities master plan that incorporates the smart growth principles of the RCP."	Integration of the RCP with infrastructure facility planning is captured in Actions #1 and #3 of the IRIS chapter. The emphasis of Action #2 is for infrastructure providers to link their short-term capital improvement plans to their long term strategic planning efforts.
187	2/26/04	letter	Michael Ott, LAFCO	Parks, Libraries, Police, Fire, and Hospitals (p. 167) - In the aftermath of the devastating fires in the County of San Diego last fall, and the existing mutual aid agreements between the various Fire Protection Districts in the county, the financial aspects of fire protection facilities should be acknowledged as a regional infrastructure and discussed in the IRIS chapter.	The Public Facilities and IRIS chapters include an initial discussion of these topics; however, due to time constraints, a complete analysis of these topics was prohibited. However, future updates of the RCP may address these topics in more detail.
188	2/26/04	letter	Michael Ott, LAFCO	Defining Regional and Subregional Infrastructure (p. 237) - This section identifies the criteria used to select the "region-serving" infrastructure areas to be examined in the IRIS. Based on the regional impact of last fall's devastating fires in San Diego County, and the provision of fire protection services at the regional and subregional level, it would be appropriate to discuss fire protection facilities within the IRIS as a region-serving infrastructure.	The Urban Form chapter discusses the need to design communities to facilitate the protection from fires through means such as establishing fuel management zones. In the Healthy Environment Chapter, natural fire ecology was added as a key issue along with an action item calling for the consideration of wildfires when designing future developments. SANDAG recently appointed a Public Safety Committee to advise the Board of Directors on major policy level matters related to public safety.
189	2/26/04	letter	Michael Ott, LAFCO	Infrastructure Needs and Expenditures (p. 250) - This section should mention SANDAG's efforts, in collaboration with LAFCO and CWA, to develop guidelines for service providers to better coordinate their master plans with the smart growth goals of the RCP.	The effort is the on-going collaboration between agencies. Our inferred collaboration and working relationship is captured under IRIS Policy Objective number 1.
190	2/26/04	letter	Michael Ott, LAFCO	Existing Plans and Programs - Other State and Local Housing Funding and Regulatory Programs (p. 82) - This section should mention that LAFCO is required to consider the extent to which a submitted proposal for a change of local governmental organization will affect a city and/or the County in achieving their respective fair share of the regional housing needs as determined by SANDAG.	A reference to LAFCO was added to this section.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

191	2/26/04	letter	Michael Ott, LAFCO	Need for Smart Growth (p. 88) - The discussion of the lack of infrastructure in older communities to support additional growth is an additional reason to expand the pilot Smart Growth Incentive Fund to include special districts that can support the smart growth goals of the RCP in providing this needed infrastructure in infill-type areas.	See response to comment #181.
192	2/26/04	letter	Michael Ott, LAFCO	The paragraph on Wastewater should be placed closer to the beginning of the section to better differentiate between the untreated storm water systems and the treated sewer systems.	The "Wastewater" section has been placed after the "Urban Runoff" section.
193	2/26/04	letter	Michael Ott, LAFCO	Key Issues: Rural Water Needs (p. 150) - This section states, "An increase in development in those areas puts a strain on local water supplies." This statement should be followed with another that restates the goals of the RCP to discourage development in these areas and encourage development in urban areas with existing water service infrastructure.	The "Rural Water Needs" section in the Public Facilities chapter has been amended to reflect this comment.
194	2/26/04	letter	Michael Ott, LAFCO	Existing Plans and Programs (p. 150) - This section should indicate that LAFCO is responsible for the adoption and update of Spheres of Influence (SOI) and Municipal Services Reviews (MSR).	Due to the long-term and regional nature of the RCP, the information provided in the plan does not include the level of specificity mentioned in this comment.
195	2/26/04	letter	Michael Ott, LAFCO	Key Issues: Capital Improvements (p. 153) - This section should mention the LAFCO Municipal Services Review (MSR) and Sphere of Influence (SOI) update process, which is required by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, that utilizes SANDAG growth projections to examine each city/agency's CIP and SOI.	Due to the long-term and regional nature of the RCP, the information provided in the plan does not include the level of specificity mentioned in this comment.
196	2/26/04	letter	Michael Ott, LAFCO	Existing Setting - Water Supply and Sewer Service (p. 32) - The discussion on water and sewer service is too narrowly focused on SDCWA and the County of San Diego. There are many other agencies responsible for water and sewer service that affect growth in the County.	SANDAG agrees with this comment. These issues are addressed in different chapters of the RCP. The Water Supply section of the Public Facilities chapter includes information on the water agencies. In addition, the Integrated Regional Infrastructure Strategy (IRIS) appendices include information on water and wastewater providers. The context of the discussion in the Urban Form chapter is focused on the CWA service area boundary and the challenges of growth beyond this boundary. A discussion of the other water and sewer service providers is not appropriate for this particular section.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

197	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page xv, paragraph 3, 3rd sentence: "But what should that tomorrow look like? Many would say: <u>clean air, clean water</u> , less traffic, more home ownership, great schools, better transit, pristine open space, and a higher standard of living."	Suggestion incorporated.
198	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page xvii, paragraph 1, 1 st sentence to read: "Another important "E" is Environmental justice: ensuring that plans, policies and actions do not disproportionately <u>negatively</u> affect low income and minority communities."	Suggestion incorporated.
199	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 285, Table 9.1, include in the table the Policy Objective recommended for Chapter 4D, page 99: <u>Provide a larger, healthier urban community forest as part of the urban ecosystem.</u>	The scope of the RCP did not include consideration of Urban Community Forests. However, the Implementation chapter of the RCP indicates that additional topics will be considered in future updates to the RCP.
200	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 3, box, 5 th bullet, 3 rd sentence to read: "The RCP evaluates our policies for fairness – to ensure they do not disproportionately <u>negatively</u> impact minority and low-income communities."	Suggestion incorporated.
201	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 3, box, last bullet, 3 rd sentence: (typo) stated <u>d</u> goals	Typo corrected.
202	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 6, 2 nd paragraph, 2 nd sentence: (typo) bu <u>s</u> es.	Typo corrected.
203	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 7, 1 st paragraph, last sentence: (typo) <u>were</u> used	Grammatical error corrected.
204	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 27, top of page, Item #6, add: "6. Design development to reduce auto dependency <u>and improve the walking environment through safe and pleasant streetscapes</u> ; and"	Suggestion incorporated.
205	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 98, 3rd paragraph, 1st sentence, amend as follows: "While preserve areas provide habitat for threatened and endangered species, urban canyons and natural landscapes not included in preserve areas also provide visual relief from <u>urbanization or the built environment, and access to the region's natural resources.</u> "	This paragraph has been updated to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

206	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 98, add as 2nd paragraph under Urban Canyons and Landscapes to read: <u>"Our urban landscapes, particularly the urban community forest, provide visual and physical buffers between the natural environment and the built environment, protecting habitat quality for wildlife and improving the quality of life for residents. Through thoughtful design and quality planting and maintenance, the trees and shrubs of the urban landscape enhance the neighborhood character, improve air and water quality, and stimulate healthy and productive local economies."</u>	See comment #199.
207	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 99, add a 2nd Policy Objective: Provide a larger, healthier urban community forest as part of the urban ecosystem.	See comment #199.
208	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 99, add a 4th Planning, Design, and Coordination Action: Coordinate and cooperate throughout the region on tree canopy management functions.	See comment #199.
209	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 99, add three additional Program and Project Development and Implementation Actions: 1. Coordinate efforts throughout the region and with the California Department of Forestry to create a green data layer for the region's Geographic Information System (GIS). 2. Identify and implement policies in each jurisdiction which develop, nurture and protect the urban community forest. 3. Identify and implement programs for tree planting, maintenance, protection, and public education.	See comment #199.
210	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 99, add a 4th Funding Action: Secure regional funding for projects to develop, nurture and protect the urban community forest.	See comment #199.
211	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 93, 2030 Vision, 1st paragraph, after last sentence, add: "Urban canyons, parks, and public spaces in our cities reflect the native habitats of the area. Native birds frequent local parks and our own backyards. <u>A healthy urban community forest enhances our aesthetic environment, absorbs noise, and cools and refreshes the air we breathe."</u>	See comment #199.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

212	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 94, Introduction, 4th paragraph, 1st sentence, add: "Clean air and water, viable natural habitats, <u>a healthy urban community forest</u> , and a well-managed shoreline are critical components to the overall economic prosperity of our region. They are also critical to the health and well-being of our residents."	See comment #199.
213	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 137, 2nd Paragraph, 1st sentence, Strengthening the Relationship between Workforce Requirements and the Educational Programs to read: "Investment in the physical infrastructure ---roads, air and water ports, as well as adequate water supply, hazardous waste storage sites and energy generation and transmission facilities, <u>and investment in the environment --- promoting an urban community forest to help provide clean air and water.</u> "	See comment #199.
214	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 144, Add a 5th point before Funding. Actions to Ensure Economic Prosperity – Program and Project Development and Implementation. " <u>Encourage energy efficient policies such as conservation efforts and planting and maintaining an urban community forest to help save energy and to help clean the air and the water of the region.</u> "	See comment #199.
215	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 140, 5th Paragraph, 2nd sentence, Improving the Region's Business Environment and Monitoring Our Progress, to read: "However some level of public oversight and control is desirable to protect the public good and maintain a healthy living environment for our residents and wildlife. <u>This could include protecting our trees and natural resources.</u> "	Proposed addition is out of context with this paragraph.
216	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 142, 5th Paragraph, Add after 2nd sentence. "The region should promote public policy changes and investment that continue to diversify the region's water sources and work with interested parties on providing California with a competitive water market. <u>Also, the region should promote policies for providing for an urban community forest to better conserve energy and help provide clean air and water.</u> "	Proposed addition is too specific for inclusion within context of existing text.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

217	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 143, Add a 5th bullet. • <u>Working to educate the general public on the value of conservation and the value of maintaining and planting an urban community forest to help the region save energy and help clean the air and water for a better quality of life.</u>	Proposed addition is too specific for inclusion within context of existing text.
218	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page xxxiii, paragraph 2, add "Community Forest" bullet at end: "The [Integrated Regional Infrastructure Strategy] IRIS focuses on <u>nine</u> important infrastructure areas:	The scope of the RCP did not include consideration of community forests. Due to the resource and schedule constraints, there is not sufficient time to include "Community Forestry" as a separate IRIS Appendix. The IRIS does include an Open Space & Habitat Appendix and this item may be considered in future updates to the RCP.
219	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 272, Water, Item #4, add: Mention use of incentives "for maximizing water recycling and reclamation efforts, and linking recycling opportunities to new and existing development."	The use of incentives is suggested throughout the RCP and should be applied wherever appropriate. Sentence has been changed to read "...and existing development and reviewing the possible use of incentives ."
220	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 237, List at bottom of page, add: <u>nine</u> infrastructure areas, <u>and Community forest.</u>	See comment #218.
221	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 241, Figure 7.5, add bubble: <u>Community Forest.</u>	See comment #218.
222	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 249, Table 7.1, add: Left column: <u>Community Forest.</u> Middle column: <u>Continuation of existing general revenues.</u> Right column: <u>Continuation of existing state and federal grant funding.</u>	See comment #218.
223	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 256, Table 7.2, add: Left column: <u>Community Forest.</u> Other columns: (Note: Request SANDAG to obtain operation and maintenance budgets from Cities and County.)	See comment #218.
224	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 257, Figure 7.7, add to pie chart: <u>Community Forest.</u> (Note: Use data generated for Table 7.2 to complete pie with Community Forest data.)	See comment #218.
225	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 258, Table 7.3, add: Left column: <u>Community Forest.</u> (Note: Request SANDAG to obtain capital improvement budgets from Cities and County.)	See comment #218.
226	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 259, Figure 7.8, add to pie chart: <u>Community Forest.</u> (Note: Use data generated for Table 7.3 to complete pie with Community Forest data.)	See comment #218.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

227	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 266, End, add: " <u>Community Forest</u> . (Note: Request SANDAG to insert highlights of some of the more significant findings from the research done to create Community Forest sections of Tables 7.2 and 7.3.)	See comment #218.
228	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 270, Goals, Policy Objectives and Actions, add: Information from new Chapter on Community Forest.	See comment #218.
229	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 4, 1st paragraph, 2nd sentence. "The appendices represent an inventory and evaluation of the nine infrastructure areas selected to be analyzed; representing the first of a four step process designed to determine if the capital improvement programs and plans of the nine infrastructure areas analyzed currently support the urban form and design goals envisioned in the RCP." Page 5, 2nd paragraph: NINE INFRASTRUCTURE AREAS ANALYZED. (Note: the Community Forest meets all of the "Infrastructure Criteria" for inclusion in the RCP.)	See comment #218.
230	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 236, 2nd paragraph, last sentence to read: "In drafting the Regional Comprehensive Plan, we are developing a long-term blueprint for the San Diego region that will help us achieve our goal of balancing population growth and sustainable development <u>with preservation of locally significant habitats and ecosystems.</u> "	The suggestion would create too narrow a definition of sustainable development. Furthermore, sustainable development includes preservation of habitat and ecosystems.
231	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 270, Goal #1, add: Frequency of "regular assessments."	Unfortunately, infrastructure planning is not coordinated in such a way to allow for a strict schedule for regularly assessing infrastructure capabilities.
232	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Pages 239-241, Projected Long Term Need: Add a statement about trees' ability to reduce long term peak energy demand.	We have added a statement regarding the use of urban forests to reduce energy demand to the paragraph.
233	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 5, 4th paragraph: The list below shows the <u>9</u> infrastructure areas evaluated in the IRIS. • Community Forest	See coment #218.
234	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 71, Policy Objective #6, add: "Create more walkable and bicycle-friendly communities <u>that include streetscapes with trees, street furnishings and safety improvements.</u> "	The policy objective has been modified to incorporate urban design issues.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

235	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 70, Access to Transit Services, 3 rd sentence, add: "Even if transit exists nearby, geography or even a lack of sidewalks <u>with comfortable and safe walking streetscapes</u> prohibit some seniors and people with disabilities from using it."	No text change was made. Urban design concepts are addressed in the Urban Form chapter.
236	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 16, Table, Bullet 2: Bulking these non-developable lands together disguises their environmental impact and their ultimate future. Many military holdings are presently developed by the military, with housing, offices, shooting ranges, landing fields, etc. Further, military holdings can be developed commercially (Naval Training Center is an example), as can designated open spaces. Please correct this and quantify acreage in separate categories.	Military acreage has been separated out in the final RCP. Military holdings can be developed commercially as a result of base closures, as is the case with NTC. Designated open space land generally cannot be developed.
237	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 16, Table: The numbers of anticipated development acres is named (Bullet 6), however the number of acres set aside for habitat preservation is not (Bullet 3). Please include the number of acres anticipated for habitat preservation. It is important because the need for open space, with its proven effects on water quality, air quality and energy conservation -- all quantifiable in dollars -- will grow as development continues.	Suggestion incorporated.
238	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	General Feedback: To quote Earl Warren in reference to population growth, "Mere numbers do not mean happiness." The Overview's complete lack of references to the environment and urban ecology undermines its credibility as a prognostic document. In this chapter, measures of power and water availability should be incorporated into statistics, together with projected impact of anticipated development on water supplies as well as air and water pollution.	The Overview chapter is primarily intended to provide a forecast of demographic trends. Environmental issues are covered in other chapters. Both SDG&E and the County Water Authority, the entities responsible for providing water and power to the region, are technical advisors to the forecast, and both have stated that future supplies are adequate relative to the forecast. The US Department of Transportation requires proof that air quality in the forecast horizon year (2030, in this case) will remain in conformance with federal standards.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

239	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 21: Projections show people working here without living here. Why is commercial development not factored into this Overview? It is certainly a "current condition" and "future trend." Limiting commercial development would diminish reasons for commuting here, however, this possibility is obscured by separating the data and remanding the Plan's strong but short-sighted support for boosting commercial development to a chapter called "Economic Prosperity," which could just as easily be called "Clogged Freeways and More Pollution."	The Overview chapter provides future trends in population, housing, and employment in the region. Limiting employment may or may not reduce population growth. However, there has never been any political will or consensus for policies intended to reduce the number of jobs in the region. The Economic Prosperity chapter does not advocate "boosting commercial development." Rather, the goal is to ensure a rising standard of living for all residents, largely through better education, job retention, and higher-paying jobs.
240	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 213, 2nd paragraph under Introduction, 2nd sentence, add: "Social equity is providing all residents with access to affordable and safe housing, quality jobs, <u>healthy natural living environment</u> , adequate infrastructure, and quality education."	The sentence was changed to reflect this comment.
241	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 214, 1st paragraph, 2nd sentence, add: "Environmental justice is achieved when everyone, regardless of race, culture, or income, enjoys: the same degree of protection from environmental and health hazards; <u>equal access to healthy, natural settings such as parks, waterfronts, etc.</u> ; and equal access to the decision-making process to have a healthy environment in which to live, learn and work."	The existing sentence reflects the intent of the comment.
242	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 224, 2nd paragraph, 3rd sentence, add: "While focusing growth in these communities is encouraged, this growth must include adequate supporting infrastructure, <u>including healthy living environments</u> , to ensure a rising standard of living for existing residents."	Supporting infrastructure is left deliberately broad here to encompass a wide range of amenities.
243	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 225, Action #2, add: "Develop an urban design best practices manual as a tool for local agencies, which addresses crime prevention, universal design, accessibility, <u>and healthy natural living environments</u> , as well as other urban design issues."	The term "healthy natural living environment" is not defined by the commenter. Open space, landscapes, native plants, and trees are part of the built and natural environment and will be included in the urban design best practices manual.
244	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 230, 1st paragraph, Action #2, add: "Evaluate the quality of surface water bodies in lower income and minority communities and develop and implement programs to ensure they are not disproportionately <u>negatively</u> affected."	This action is not included in the final RCP.
245	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 229, add a bullet between #8 and #9: " <u>Promote healthy living environments including parks, urban community forest, and green spaces for recreation.</u> "	See comment #199.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

246	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 230, 1st paragraph, add a bullet between Actions #1 and 2: " <u>Encourage enhancement of communities through increased density of the urban community forest and green spaces.</u> "	See comment #199.
247	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Page 231, Action #1 near top of page: Provide more specificity in this action.	This action is from the Economic Prosperity chapter, and more discussion is included in that chapter.
248	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 75, 2030 Vision- Introduction, paragraph 2, sentence 2 to read: "Our homes are also energy efficient and our yards are attractively landscaped with less thirsty native plants <u>and many more appropriate trees.</u> "	This concept has been incorporated into the vision.
249	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 83, KEY ISSUES – 4th bullet to read: "Some believe that all housing should be built based on universal design and green building principles <u>which include both conservation construction and shade trees</u> ; others believe such requirements add unreasonable costs to new housing."	Green building principles encompass many concepts and to list them all would make this section too detailed. However, an expanded discussion of green buildings techniques was added to the Housing chapter.
250	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 88, Need for Maintenance, Preservation, and Rehabilitation, paragraph 4, sentence 2 to read: "Rehabilitation assistance can be provided through low or no interest loans or grants to the owner of the property and this <u>assistance can also include grants for free trees (to save energy, reduce air pollution and conserve water.)</u> Rehabilitation should also <u>include the protection of existing trees for better energy efficiency...</u> "	A change to this effect was made.
251	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 90, Policy Objectives, 4th point to read: "Maintain, preserve, and rehabilitate the existing housing stock <u>using energy efficient and green building techniques (including both conservation construction elements and shade trees).</u> "	See comment #249.
252	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 91, Program and Project Development and Implementation, 5th point to read: "Develop and implement programs for new housing construction that encourage environmentally sustainable construction (green building techniques), <u>landscaping for energy savings with appropriate trees and native plants and application of universal design principles to promote accessibility.</u> "	See comment #249.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

253	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	General: Recommend including that local decision-makers use the San Diego Urban Ecosystem (Tree Canopy) Analysis in policy decisions.	The information provided in the plan does not include the level of specificity mentioned in this comment. However, the Implementation chapter of the RCP indicates that additional topics will be considered in future updates to the RCP.
254	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 40, Designing Livable Places, 1 st paragraph to read: Insert after 4th sentence ". . . high quality design in new facilities." <u>Livability means integrating our remarkable natural environment and climate into our daily lives. Good urban design in San Diego County means finding ways to be outdoors enjoying our environment in walkable communities.</u>	Language reflecting suggested concepts has been incorporated into referenced paragraph.
255	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 31, 2030 Vision, paragraph 1 to read: <u>Our remarkable landscape is woven into our neighborhoods with beautiful tree lined streets, parks and open spaces - connecting us with the mountains, valleys, mesas and beaches.</u> Our homes are connected to attractive, efficient, and well integrated transit stations. Many of our communities, particularly along major transit corridors, are more compact, yet they don't feel crowded thanks to good urban design and landscaping neighborhood parks. People enjoy living in multi-family and mixed use neighborhoods within an easy stroll of retail stores, parks, playgrounds, childcare, healthcare, restaurants, movie theaters, museums, vocational schools, and other recreational activities. Our historic main streets are vibrant. Our rural communities have grown, but retain their small town charm.	The referenced paragraph has been left as written.
256	2/27/04	E-mail	Nancy Hughes, Community Forest Advisory Board	Change page 31, 2030 Vision, paragraph 2 to read: We are socially connected and more civically engaged, and as a result, have sound strategies for funding our schools, libraries, and other public services. Our neighborhoods are beautifully landscaped with native trees and flowers. Our streets are walkable and wheelchair <u>universally</u> accessible and they are safer to cross. We <u>celebrate our sublime climate by</u> regularly walking and riding our bikes, and this increased activity makes us healthier.	The referenced paragraph has been left as written.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

257	2/27/04	letter	Robert Copper, County of San Diego	This report does not cover all regional or local needs and priorities such as fire protection, health, human services, courts, libraries, and others. It is important to keep in mind that even though those services are not included in the RCP, continued and in some cases enhanced funding is also needed for both operations and facilities.	We agree the RCP does not cover all regional needs as the original scope of the RCP focused work efforts on the land use/transportation connection. The Implementation Chapter of the RCP indicates that additional topics will be considered in future updates to the RCP, and the Public Facilities Chapter of the RCP states that this first RCP does not address the planning, financing or implementation of libraries, police, fire, and hospitals. SANDAG recently appointed a Public Safety Committee to advise the SANDAG Board of Directors on major policy level matters related to public safety. We look forward to working with the County on this Committee.
258	2/27/04	letter	Robert Copper, County of San Diego	Page 95, Final Paragraph Regarding Inclusion in Multiple Species Conservation Program (MSCP): This paragraph is not accurate because most remaining natural habitats are in the unincorporated area, and most are not yet included in subarea plans.	Paragraph has been revised to reflect this comment.
259	2/27/04	letter	Robert Copper, County of San Diego	Page 99, Funding Section: Amend #1 to read: "Secure regional funding to acquire high-value habitat areas from willing sellers as shown in adopted habitat plans."	The action has been changed to reflect this comment.
260	2/27/04	letter	Robert Copper, County of San Diego	Page 99, Planning Action Program #3: This action program is inconsistent with the County's experience with agricultural productivity. Availability of water and climate are the factors that generate high value agricultural productivity. It should also be noted that much of the County's agricultural productivity occurs in the incorporated cities. The County has an Agricultural Commissioner who is working with farmers and ranchers on numerous fronts to retain the vitality of the agricultural industry in this County. Programs related to protection from agricultural pests, international trade regulations, pesticide regulations, fees and regulations imposed on farmers, and other issues are continually being addressed. There is no need for an action program, as proposed, to "develop guidelines to protect agricultural soils for future production, and to buffer them from native habitats and urban land uses." This action program is unnecessary and should be deleted, or replaced with an ongoing action such as "continue County support for the agricultural industry."	The bullet point related to this action in the Urban Form chapter has been removed. Additionally, the policy objective in the Healthy Environment chapter has been modified to only address agriculture in terms of its role of future crop production and for functions described in habitat conservation plans. The issue of the economic viability of agriculture may be addressed in a future update to the RCP.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

261	2/27/04	letter	Robert Copper, County of San Diego	Page 144, Funding (last bullet on the page): Please note that the County of San Diego has not endorsed SANDAG's proposed Fiscal Reform Proposal. This is important in planning your work program scheduling, which needs to begin with developing a proposal with jurisdictional support. It is premature to begin with implementation since there is no agreed-upon proposal yet.	The action has been modified as follows: "Reach regional consensus on, and implement a state-local fiscal proposal that provides financial incentives to local jurisdictions to increase the supply of housing and helps achieve the smart growth goals of the RCP."
262	2/27/04	letter	Robert Copper, County of San Diego	Page 296, Economic Prosperity Funding Actions: Why is there a check for federal/state but none for cities/county? The first step is to develop a proposal that the 19 jurisdictions agree upon, and only then should we solicit state legislation.	This table has been removed from the Implementation chapter and replaced with a listing of "Strategic Initiatives."
263	2/27/04	letter	Robert Copper, County of San Diego	Appendix A.5 Solid Waste Collection, Recycling and Disposal: Section II, second paragraph, first sentence - Solid Waste landfills in the San Diego region are regulated by more than two agencies. The Regional Water Quality Control Board and the Air Pollution Control District regulate environmental issues at the sites relating to water quality and air quality respectively.	Paragraph revised to reflect this comment.
264	2/27/04	letter	Robert Copper, County of San Diego	Appendix A.5 Solid Waste Collection, Recycling and Disposal: Section III, Operations and Maintenance (FY 2003) - second paragraph, third sentence - Please insert the word "inactive" between "for" and "landfill."	Paragraph revised to reflect this comment.
265	2/27/04	letter	Robert Copper, County of San Diego	The report identifies several capital projects that will be completed at inactive landfills in the City of San Diego, but does not mention any County projects at our inactive landfills such as the closure of San Marcos landfill.	For all IRIS Appendix sections, the Capital Improvement Program (CIP) list and Operations and Maintenance (O&M) information is developed from FY03 budgets. It is a reproduction of the budgets as adopted, and is intended to be a snapshot in time representing the amount allocated by local jurisdictions towards a specific infrastructure area. The information is included in the Appendix to the RCP. While there may be activities at the San Marcos landfill, they are not included in the County's most recent CIP budget. In the County's FY 02-03 Operational Plan (O&M budget), \$13.1 million is allocated to the Solid Waste Management program. This may include work at the San Marcos landfill, but it is not clearly detailed. The IRIS appendix section for Solid Waste has been revised to reflect this information.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

266	2/27/04	letter	Robert Copper, County of San Diego	Page 248, Beach Sand Replenishment: Funding for beach sand replenishment would have to compete with all other Community Enhancement Program grant requests and the funding level would depend upon the priorities established by the Board of Supervisors.	Comment noted. A sentence has been added on page 297 stating that any specific allocation of TOT funds to beach sand replenishment would have to be considered and evaluated by each jurisdiction responsible for allocating TOT funds.
267	2/27/04	letter	Robert Copper, County of San Diego	Education Appendix: Please note that class size reduction is an option, not a mandate.	The County is correct. California's state legislature passed the Class Size Reduction Initiative (SB 1777) in 1996. SB 1777 is a reform measure aimed at cutting class size in the early school grades from what had been an average of 28 students to a maximum of 20. It is a voluntary program that reimburses school districts \$800 for each K-3 student enrolled in a class of 20 or fewer student and costs the State approximately \$1.5 billion per year. The IRIS text has been revised to reflect this comment.
268	2/27/04	letter	Robert Copper, County of San Diego	Page 246-247: The assertion that "a development impact fee is a form of benefit charge" is puzzling. Normally a development impact fee is levied to mitigate detriment caused by the development and is not necessarily related to benefit. Development impact fees are not subject to Proposition 218 which governs assessments based on benefit.	Reference to development impact fees serving as a form of benefit charge has been removed based on this comment.
269	2/27/04	letter	Robert Copper, County of San Diego	Page 247, Top Paragraph: Is this section suggesting that proceeds from a regional transportation impact fee would be turned over to SANDAG to be expended according to the RTP? This contradicts discussions that have been ongoing at SANDAG committee meetings which have been indicating that the jurisdictions would have the opportunity to expend funds themselves, based on their priorities, rather than being regionally prioritized.	At this writing, proceeds from the regional development impact fee contained in the proposed TransNet extension would remain with the local jurisdiction. Funds would be expended on the identified regional highway and arterial system.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

270	2/27/04	letter	Robert Copper, County of San Diego	Page 62, Bottom Paragraph and Page 63, Top Paragraph: These paragraphs imply that project design guidelines, demand management, and system management can help local jurisdictions alleviate traffic impacts. This is an example of a tone throughout the document, which implies that local jurisdictions are not presently using good planning tools. Rephrasing these and other paragraphs throughout the report should indicate that many jurisdictions are already employing many of these techniques. Expanded emphasis can be a goal, but the implication should not be left that jurisdictions have not kept up with current design principles.	The appropriate sections have been revised as suggested.
271	2/27/04	letter	Robert Copper, County of San Diego	Page 71, Policy Objective #7: This gives priority to roadway and transit investments in smart growth areas. Prioritization for projects in smart growth areas should not be at the expense of needed transportation projects in other areas where smart growth may not be reasonable, but where critical needs already exist. It must be recognized that where growth occurs, developer exactions are appropriate; whereas areas with existing deficiencies can only be improved with other funds even more difficult to acquire. Resolving existing deficiencies remains an important and appropriate use of discretionary road funds, and an even higher voter priority than subsidizing new development, smart or otherwise.	Policy Objective #7 in the Transportation chapter was not changed. It appropriately reflects the intent of the RCP to provide priority to transportation investments in smart growth opportunity areas while recognizing needs elsewhere in the region.
272	2/27/04	letter	Robert Copper, County of San Diego	Page 72, Actions: An action should be added that would identify and preserve corridors for future transportation projects.	Language was added to Action #3 under Planning, Design, and Coordination
273	2/27/04	letter	Robert Copper, County of San Diego	Page 73, Fees: The Draft RCP mentions the use of fees to generate funding for transportation projects. It should be noted that the County has initiated a feasibility study for a pilot program that would implement a Developer Impact Fee for the Ramona and Fallbrook communities.	Comment is noted.
274	2/27/04	letter	Robert Copper, County of San Diego	The RCP and RTP should include financing/funding programs for transportation projects that will address the needed roadway improvements caused by tribal gaming impacts. The County of San Diego strongly supports SANDAG's efforts to increase coordination and consultation with the local Tribal Governments.	The Borders chapter of the RCP currently includes discussion on transportation project coordination with tribal governments. A cross-reference has been added to the Transportation chapter regarding the tribal transportation issues discussed in the Borders chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

275	2/27/04	letter	Robert Copper, County of San Diego	Attempting to reduce congestion through the facilitation and encouragement of smart growth developments does not address the diversity of regional transportation needs. The RCP should provide a more comprehensive plan that addresses all the transportation needs in the region. This includes the unincorporated areas and other incorporated areas in which smart growth opportunity areas are not identified.	The RTP is the document that addresses the regional transportation needs of the region. The RCP acknowledges that there are continuing transportation needs throughout the region, and proposes adding additional criteria to an existing prioritization process that relates to MOBILITY 2030. The revised prioritization process would not add or delete regional projects, but instead, would potentially place different weights on existing and new criteria, potentially impacting which projects get funded first. Additionally, a matrix of smart growth area classifications has been added to the Urban Form chapter. The matrix includes seven categories of smart growth, including community centers and rural communities, in which unincorporated areas can qualify as smart growth opportunity areas.
276	2/27/04	letter	Robert Copper, County of San Diego	Page 59: A specific transit goal/objective to make public transit competitive with solo driving during peak periods is identified. Specific goals for highways and highway users, however, are not identified in the RCP. Goals and objectives for the highway facilities, such as level of service (LOS), should also be specified and identified in the RCP. In terms of commuters, consideration of a goal to achieve an overall average commute time should also be considered to provide a balance between transit and cars. This would enable a better comparison to show where improvements are being made to quality of life and better identify improvements that would benefit a given area.	These issues are specific to the MOBILITY 2030 and not the RCP. The quoted goal/objective is drawn from the RTP. As laid out in the Performance Monitoring chapter, annual and periodic indicators and targets will be monitored to measure the progress of the RCP.
277	2/27/04	letter	Robert Copper, County of San Diego	Page 68, Setting Priorities for Transportation Improvements: A set of priorities outweighs the need to provide incentives to encourage smart growth. A separate "Smart Growth Incentive Program," as identified on page 48 of the RCP, is already established.	The Smart Growth Incentive Program is a separate program from the effort to revise transportation project evaluation criteria to incorporate smart growth as a factor in the prioritization of transportation funding.
278	2/27/04	letter	Robert Copper, County of San Diego	The RCP should specify the amount of growth that is assigned/forecast to be accommodated in the areas that do not have smart growth opportunity areas. The RCP should also identify the transportation needs in these areas and include in the plans measures and actions to address these transportation needs.	The RCP has not yet identified the specific boundaries of the SGOAs. Local transportation needs are identified by the local general plan and circulation elements.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

279	2/27/04	letter	Robert Copper, County of San Diego	A monitoring program should be established to monitor and access the smart growth development to discern/ensure that they are meeting the assumed transit ridership and vehicle trip reduction objectives/assumptions.	SANDAG intends to monitor the transportation impacts of smart growth development as it is implemented. The Performance Monitoring chapter discusses the annual and periodic indicators and targets for measuring the progress of the RCP.
280	2/27/04	letter	Robert Copper, County of San Diego	The RCP should encourage coordination between SANDAG, the City of San Diego, the County of San Diego, Caltrans, and Mexican officials in identifying and prioritizing needed roadway improvements in the border region that will facilitate binational trade.	See Policy Objectives and Actions, Chapter 5, Borders, Transportation section.
281	2/27/04	letter	Robert Copper, County of San Diego	Page 16, and page 32, Density Categories: The last bullet in the box entitled "Land Facts" states that "93 percent (519,000 acres) is planned for very low density residential use (less than one home per acre), and most is in the rural back country areas dependent upon scarce groundwater supplies." This is inconsistent with the County's breakdowns of density ranges.	The terms such as "rural" and "very low density," used here are intended to be generic, and are not a reference to the official land use designations of any jurisdiction. The point was simply to highlight the fact that relatively little vacant land remains in the region that is planned for urban or suburban densities. The wording has been adjusted.
282	2/27/04	letter	Robert Copper, County of San Diego	Please keep in mind that it is counterproductive to add more requirements to the land development process, particularly those resulting in delays in processing and added applicant submittal requirements. It sounds as though SANDAG is contemplating additional review committees for siting of large-scale projects, energy projects, et cetera which will add to costs and reduce the likelihood of needed facilities being sited at all.	Social equity and environmental justice need to be taken into consideration when siting large scale projects that could potentially disproportionately negatively affect low income, minority, or disabled members of the community. However, additional review committees are not necessary. Instead, existing project review committees should consider social equity and environmental justice factors when assessing the project.
283	2/27/04	letter	Robert Copper, County of San Diego	Page 90, Items 1-3: This calls for identifying and rezoning sites for various types of housing. The word "appropriate" should be inserted, clarifying that this should take place in appropriate locations.	The text has been amended to reflect this comment.
284	2/27/04	letter	Robert Copper, County of San Diego	Page 167, Education (last paragraph on the page): The assertion that "...planning and siting of elementary and secondary schools and community colleges is also primarily a local responsibility" is misleading. By "local responsibility," clarify that this refers to the local school districts rather than cities and the county.	The text has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

285	2/27/04	letter	Robert Copper, County of San Diego	The watershed description is somewhat misleading, as it appears that all watersheds drain to the Pacific Ocean and contribute to the pollution loading along the beaches. This description should be expanded to better define and explain the functionality of these geographic areas. We suggest that you explain how the Tecate Divide splits the County of San Diego into two hydrologic regions: The San Diego Hydrologic Region and the Colorado Hydrologic Region. Figure 4d.4 provides a good visual, but the section lacks the requisite narrative discussion.	Watersheds are introduced in the discussion on the "Hydrologic Cycle" and the section has been expanded to mention several different outflows, including the Pacific Ocean. In addition, the definition of watershed has been expanded to include a description on the hydrologic regions.
286	2/27/04	letter	Robert Copper, County of San Diego	Rather than define the 'hydrologic cycle' to the reader, which is something most people already understand, we suggest that you provide more discussion on how urban development impacts the hydrologic cycle. It is briefly discussed on page 102, but more detail is needed in order to convey its importance to the reader. A figure comparing how the hydrologic cycle is impacted under pre- and post-development conditions would be beneficial.	The RCP is not only a resource for agencies and organizations that may be familiar with the hydrologic cycle but for all residents. The hydrologic cycle has been kept in the document. Expanded discussion of how development impacts the hydrologic cycle has been added. Additionally, a figure comparing how the hydrologic cycle is impacted under pre- and post-development conditions has been added.
287	2/27/04	letter	Robert Copper, County of San Diego	Page 103, Second Paragraph, Stormwater: You should not limit your discussion and analysis to only those watersheds located entirely within the County of San Diego. How San Diego municipalities plan and develop those areas is equally important as the other watersheds and deserves discussion.	We agree that development outside of the San Diego region has major impacts on our region and in particular on the health of our shared watersheds. This concept is mentioned in this chapter as well as the Borders chapter of the RCP. Unfortunately, SANDAG does not have all of the demographic data necessary to complete the tables that are included in the RCP for those watersheds that are only partially located within the region.
288	2/27/04	letter	Robert Copper, County of San Diego	Page 107, First Bullet: It can be argued that "Stormwater drains" is not an accurate example of point source pollutants. This entire discussion should be moved to the third paragraph on page 108, where you describe the Clean Water Act. Point and non-point sources are National Pollution Discharge Elimination System terms.	The definition of point source pollution was amended and both definitions (point and non-point sources) were moved to the discussion on the Clean Water Act.
289	2/27/04	letter	Robert Copper, County of San Diego	Page 108, First Paragraph: Recommend providing a link to where readers can get a copy of the Basin Plan.	Information has been provided in a footnote.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

290	2/27/04	letter	Robert Copper, County of San Diego	Page 108, Third Paragraph: Governmental agencies are not the only ones subject to NPDES permitting requirements. We recommend adding language to this paragraph explaining that private industrial businesses such as certain manufacturing, biomedical, and scrap yard facilities are also subject to a NPDES permit.	The text has been amended to reflect this comment.
291	2/27/04	letter	Robert Copper, County of San Diego	Page 108, Fifth Paragraph, First Sentence: The permit that was issued in 2001 did not include the San Diego Regional Airport Authority, as they did not exist at that time. The NPDES Stormwater Permit, which we refer to as the 2001-01 Municipal Stormwater Permit, was amended in August 2003 to include the Airport Authority.	The text has been amended to reflect this comment.
292	2/27/04	letter	Robert Copper, County of San Diego	Page 108, Last Paragraph: We recommend that you replace this paragraph with the following, or version thereof: The 2001-01 Municipal Stormwater Permit requires in part, that the Co-permittees develop and implement two water quality programs to address the pollution found in urban stormwater runoff: the Jurisdictional Urban Runoff Management Program (JURMP) and the Watershed Urban Runoff Management Program (WURMP). In summary, the JURMP, which is developed and implemented by each municipality, describes what the jurisdiction is doing within its own borders to address the pollution levels found in their Municipal Storm Sewer Systems. The program establishes clear minimum stormwater management requirements and controls for four primary activities: commercial, industrial, municipal, and new construction/development. The WURMP, which is developed by the Co-permittees within a particular watershed, includes the identification of high priority water quality issues and pollutants found within the watershed and a list of activities that target those water quality issues. Each municipality has developed and implemented a JURMP. Furthermore, a WURMP has been developed and implemented for every watershed within the San Diego Hydrologic region. Copies of the WURMPs can be found on the Project Clean Water website at www.projectcleanwater.org .	The text has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

293	2/27/04	letter	Robert Copper, County of San Diego	<p>Page 109, Intergovernmental Coordination: There are three primary concerns with this section. 1) The WURMPs are a perfect example of how the municipalities have collaborated in the development and implementation of an intergovernmental program that addresses surface water quality issues. However, this has not be recognized in this section of the report. 2)There is a discussion of the need to develop comprehensive watershed management plans that address habitat conservation, flooding, erosion control, reseeding efforts and water quality. We concur with the need for such plans, but considering that this section of the report is devoted solely to water quality, we do not think it is appropriate to include this discussion here. Rather, it may be more appropriate to include a separate discussion on the need to combine overlapping programs. 3) The section fails to acknowledge that the County and City of San Diego are currently in the process of developing comprehensive watershed management plans for several watersheds in the San Diego Hydrologic Region. We should recognize these efforts.</p>	<p>The text has been amended to acknowledge the WURMPS and the water quality efforts that are taking place. With regard to the second issue raised, SANDAG's primary intent was to address water quality; however, the outcome of comprehensive watershed management plans will benefit these other issue areas as well.</p>
294	2/27/04	letter	Robert Copper, County of San Diego	<p>Page 111, Development and Urban Planning: This is the first time you use the term BMP. You should define the acronym. Further you should also describe the Co-permittee's Standard Urban Stormwater Mitigation Plan (SUSMP), which addresses the JURMP requirements that apply to new construction/development activities.</p>	<p>The fist time BMPs are mentioned is under "Monitoring and Management Programs" and the acronym is defined. Additionally, language has been added to the text under the JURMP explanation that addresses the SUSMP.</p>
295	2/27/04	letter	Robert Copper, County of San Diego	<p>Page 111, Drinking Water: Although urban development in San Diego can adversely impact the quality of the drinking water in our reservoirs, a majority of our drinking water is imported from the Colorado River. As such, there are existing pollutant levels found in the water before the water even enters our streams and reservoirs.</p>	<p>The "Drinking Water" section has been amended to reflect this comment.</p>
296	2/27/04	letter	Robert Copper, County of San Diego	<p>A WURMP has been developed for every watershed within the San Diego Hydrologic region.</p>	<p>Thank you for the comment.</p>
297	2/27/04	letter	Robert Copper, County of San Diego	<p>Page 104 and 106, Tables 4D.2 and 4D.3: The type and intensity of land use distribution will change considerably in certain areas once GP2020 is adopted.</p>	<p>The data used in Tables 4D.2 and 4D.3 are from the 2030 Final Forecast which incorporates inputs from the GP2020 population targets and the December 2002 Working Copy land use map.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

298	2/27/04	letter	Robert Copper, County of San Diego	Page 112, Planning, Design, and Coordination, Action Item #1: Monitoring the effectiveness of individual BMPs is impossible. We would argue that developing a framework for assessing the effectiveness of a municipality's stormwater program would be far more achievable, not to mention more beneficial to the jurisdiction.	SANDAG believes it is possible and important to evaluate the effectiveness of BMPs to ensure they meet the needs of the region. Additionally, an action has been added that addresses the effectiveness of the jurisdictional stormwater programs.
299	2/27/04	letter	Robert Copper, County of San Diego	Page 112, Planning, Design, and Coordination, Action Item #2: We suggest that this action be amended to read as follows: "Encourage and support land use planning at a watershed-level in order to improve identified water quality issues within the watershed."	The text has been amended to reflect this comment.
300	2/27/04	letter	Robert Copper, County of San Diego	Page 112, Program and Project Development and Implementation, Action Item #1: The sentence should start "Continue to..."	The text has been amended to reflect this comment.
301	2/27/04	letter	Robert Copper, County of San Diego	Page 113, Program and Project Development and Implementation, Action Item #4: proposed action item #4 has already been accomplished.	The text has been amended to more closely reflect the initial purpose and intent of this action, which is to establish <i>urban form</i> design guidelines that identify measures to reduce the impact of urban runoff.
302	2/27/04	letter	Robert Copper, County of San Diego	Page 33, Figure 4A.1, Developed and Developable Land: We request that important maps such as this one be drawn to include the entire County, not just the westernmost part that fits neatly on a page.	A new map, showing all of San Diego County, was inserted into the Urban Form chapter to replace the previous map.
303	2/27/04	letter	Robert Copper, County of San Diego	Page 43, Public Safety: Reference is made to "Crime Prevention Through Environmental Design." An appendix should be provided that includes a copy of this document as well as other references cited in the RCP. If an appendix with all the documents cannot be provided, then a bibliography/index should be provided with contact information identifying where copies of the document can be obtained.	A reference was added in a footnote.
304	2/27/04	letter	Robert Copper, County of San Diego	Page 44 and 45, Coordinating Transportation and Land Use: Discussions and efforts are made regarding residential and employment intensities. Efforts should also be made to better plan the location and size of retail, entertainment, and other intensive commercial activities. These have unique peaking characteristics especially in the evening peak hours that dramatically affect congestion on adjacent streets, intersections, and freeway interchanges.	Planning for retail, entertainment, and other intensive commercial uses should be considered within the context of subregional planning studies. As local jurisdictions plan for those land uses, those uses will be incorporated into SANDAG's growth forecast, which is used to update the RTP.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

305	2/27/04	letter	Robert Copper, County of San Diego	Page 42, Mixed Land Uses and Street Networks: This section states "streets should be designed for vehicle speeds appropriate for their environment." We recommend deleting this sentence and focusing on the development of a land use pattern and street/road network that would encourage more local trips on local roads and regional trips on regional roads. The local roads can then typically incorporate lower design speeds.	This section does recommend a local street network that encourages local trips, by all modes on local streets where vehicle speeds typically are lower. The RCP does not recommend lower speeds on all roads.
306	2/28/04	Phone	Margot Tanguay	The word "linking" seems to be a key word. Suggest using a variation , such as coordinating, integrating, incorporating, or merging, particularly on page xvi of Executive Summary, first paragraph.	Comment noted, and suggestion taken.
307	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 21, number 1, change to "to support <u>the existing need due to births over deaths and growing economic growth.</u> " Change 2 to read "region's residents <u>and a sustainable environment.</u> "	Portions of the Overview of the San Diego Region chapter were restructured; the two referenced bullet points were removed altogether.
308	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 20, last paragraph, does 60% single family figure include attached and detached?	Yes.
309	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 20, last paragraph, note that 314,000 doesn't include existing needs.	A discussion of existing needs was added to the Housing chapter in the "Increasing Housing Supply through Smart Growth" section.
310	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 21, second paragraph, does 300,000 include existing need?	See response to comment #309.
311	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 21, first paragraph, last line should read "strain on our roads, freeways, infrastructure, personal lives, <u>families, and communities.</u> "	Families is implied by "personal lives." It's not clear how interregional commuting strains communities.
312	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 227, first housing paragraph, change to "mixed-income <u>and mixed use</u> neighborhoods with sufficient affordable housing <u>for all income groups.</u> "	Mixed-use is discussed in the urban form section of the chapter. A reference to "all income levels" was added.
313	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 227, first housing paragraph, change to "high housing costs <u>have caused extreme</u> hardship..." "residents are often forced to move repeatedly, <u>double up and</u> live in overcrowded units...."	A reference to extreme hardship was added. Doubling up is implied in overcrowding, so no change was made.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

314	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 227, add statistics about the percentage of each racial/ethnic group to total population vs. the total population of households.	Statistics on race and ethnicity are included throughout the chapter.
315	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 227, add information about mold and asthma.	This information is too specific to be included in this section.
316	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Housing goals, policy objectives and actions listed in this chapter are not the same as in the main housing chapter.	The final RCP has consistent goals, policy objectives, and actions.
317	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page xxv, last line of 4th paragraph should read "and infrastructure, <u>causes more air and noise pollution</u> , as well as a strain on the quality of life for those commuters, <u>their families, and communities.</u> "	Several changes were made to this sentence reflecting the content of the comment.
318	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page xxv, 5th paragraph, line 2: "needs of its <u>existing and growing population or to accommodate...</u> "	Change was made.
319	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page xxv, last paragraph, insert existing need discussion as well as statement "In the past we have failed to meet current needs and keep pace with growth, causing our current affordable housing crisis."	Text to this effect was added.
320	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page xxvi, first paragraph, add "12 or more homes per acre, <u>which is a traditional single family development. Instead we need 40+ du/acre to help meet existing and future needs.</u> "	This statement is too specific for an executive summary -- numbers as related to higher densities are included in the Housing chapter.
321	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page xxvi, second paragraph, take out word "often", add "overcrowding" to list of issues.	Change was made.
322	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page xxvi - Give some examples of award winning projects and cite SANDAG and Housing Federation videos.	A discussion about the successes of the nonprofit housing developers was added. References to the SANDAG and Housing Federation videos are too specific, but a general discussion of the housing and smart growth education efforts taking place throughout the region was added.
323	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. xviii, the fourth goal should read "Provide a variety of affordable and quality housing choices for people of all income levels and abilities <u>in all communities.</u> "	"in all communities" was not added as it is not well defined, and could be interpreted as either in all neighborhoods or in all jurisdictions.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

324	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page xxvi - We should only talk about more housing choices if we are also talking about conserving and preserving what we have as well as rehabilitating and building MORE units.	A section on conserving and rehabilitating our existing homes was added to the Housing chapter.
325	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	In the 2030 Vision (pg. 75) the third line should read "fewer of them are forced to move out of the area to <u>afford housing</u> or retire.	This change was made.
326	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Second paragraph, 2030 Vision (pg. 75) the third line should read "our aging <u>and differently abled</u> population."	This change was made.
327	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Introduction, pg. 75, 3rd paragraph should read" more apartments, condominiums, single family and other housing types in all price ranges, These homes need to be affordable to persons of all income levels, and accessible to persons of all <u>ages and abilities</u> . They need to be located <u>throughout all</u> urban communities; close to jobs and transit to help conserve our open space and rural areas, reinvigorate our existing neighborhoods, and lessen interregional and intraregional <u>commuting</u> .	"throughout all" was not added, as it is not well defined and does not add to the meaning of the statement. "interregional and intraregional commuting" was changed to "long commutes" to ensure that we are covering all types of long distance commuting.
328	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Throughout the chapter, when discussing low and moderate income, say "extremely low, very low, low, and moderate", or change "low" to "lower." Funding programs look at low as exclusively 51 - 80% of A.M.I.	"low" was changed "lower" income throughout and was footnoted to state they include extremely low and very low income households.
329	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 76, paragraph 2, change "forecasts" to "predicts"	This change was made.
330	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 76, paragraph 2, does 314,000 forecast include existing and future housing needs? If so, clarify in earlier pages.	This is not presented as a need number, but is a forecast of what will be built during the 2000 - 2030 time period. The 5th line of this paragraph will be changed to read "These projections do not take into consideration the existing need for housing in the region, which forces many families, especially lower income families, to spend more than they can afford on housing and/or live in overcrowded units or in substandard housing.
331	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 76, paragraph 2, change "circumstances" to "units."	This change was made.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

332	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 76, paragraph 4, change "the majority" to "65%. State how many units this means throughout.	The percentage was added but the number of units was not, as this made the chapter difficult to read.
333	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 77, paragraph 1, add a statement about housing affordability levels - who can afford it?	This statistic (from the California Association of Realtors) was added.
334	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 77, last paragraph, state "Home construction in the SD region has simply not kept pace with population growth or changing demographics.	A section on housing construction not meeting the needs of our changing demographics was added.
335	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 78, last sentence should read "This not only results in more wear and tear on the housing stock <u>and strains relations among and between families</u> , but also...."	This has been changed to read "This not only puts strains upon families and causes more wear and tear on the housing stock but also...."
336	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 79, take moderate income out of the list of households that do not have enough left over to spend on other necessities.	This change was made.
337	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 79, paragraph 5, say "homeless families <u>with children</u> ."	This change was made.
338	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 79, paragraph 5, line 7, don't say "because of" mental illness (can't be proven), say "and have" mental illness.	This change was made.
339	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 79, paragraph 6, state "Many residents are <u>forced to move</u> outside the region and across the border to <u>find housing</u> , resulting in longer commutes, more traffic congestion and increased air <u>and noise pollution</u> and less time with families.	A change to this effect was made.
340	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 80, last paragraph, line 6, add "historically" before "approximately 15 - 25 du/acre"	This change was made.
341	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 81, To ensure progress, jurisdictions must annually renew their housing element.	Housing elements are not renewed annually, however there are requirements for filing annual progress reports with State HCD. This statement has been added.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

342	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 81, last paragraph, change first line to read "California's redevelopment law was created to help city and county governments eliminate blight, <u>expand jobs and increase the communities supply of affordable housing</u>	This change was made.
343	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 81, last paragraph, add - Redevelopment agencies are <u>generally</u> funded through tax....	This change was made.
344	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 81, second to last sentence, change to "These "tax increment" funds <u>and debt proceeds from loans and bonds</u> are used to finance a variety of projects in the project area. At least 20 percent of the increment must be set aside and used for the construction, rehabilitation, and preservation of housing affordable to lower and moderate income households. Redevelopment is <u>the largest</u> source of funds...	This change was made.
345	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 82, add new paragraph (including last line of existing paragraph "Redevelopment agencies are required to prepare housing production plans as part of <u>their</u> implementation plans to ensure that redevelopment housing goals are met. <u>In addition to setting aside and spending at least 20 percent of tax increment on affordable housing development, redevelopment agencies must replace housing lost as a result of redevelopment and balance all new residential development in redevelopment project areas so that they include a minimum percentage of very low, low, and moderate income affordable housing.</u>	This change was made.
346	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 82, last line, remove the word "greatly"	This change was made.
347	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 83, 2nd paragraph, change to "Despite the <u>existing and potential funds</u> , plans and programs at all levels of government..."	This change was made.
348	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	The problem is the lack of compliance with existing laws and the fact that there is little or no enforcement.	We do not currently have any statistics regarding the lack of enforcement of affordable housing laws.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

349	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 83, 3rd bullet point, say that "Some believe that <u>to reduce costs</u> " housing should be entitled by right	This statement was removed.
350	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 83, add bullet point "Some believe affordable housing opportunities should be distributed throughout the region, others believe that you can and should build more units in areas that already have higher concentrations of lower income residents."	The chapter does not include a discussion of this comment, so the proposed text was not added.
351	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 83, Fiscal inequities - when did local governments start receiving 11 times more revenue from retail? Add a date.	As a variety of factors went into the change in tax dollar allocation, an exact date for the change is not known.
352	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 84, paragraph 1 states that local jurisdictions have an incentive to approve expensive homes. This is not true. SROs generate more income to owners than larger units. Estate homes built far away from urban centers have to be served by roads, sewers, water, and other infrastructure, which is more expensive than providing smaller units in urban areas.	This statement was removed.
353	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 84, the bullet point on community opposition should include discussions of xenophobia, racism, and classism. We can't ignore that.	This falls within fears that the development will have "negative effects" on the community. No change was made.
354	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 84, add a bullet point about the lack of enforcement of laws requiring affordable housing plans and development.	We do not currently have any statistics regarding the lack of enforcement of affordable housing laws.
355	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 85, change last line of first paragraph to read "Subsidized affordable housing also is being built <u>but new subsidized units have not kept pace with loss of expiring subsidies and demolition/conversion of existing units.</u> Very little (take out <u>if any</u>) homes affordable to those whose incomes are in the moderate range are being constructed.	A change to this effect was made.
356	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 85, 3rd paragraph, change last line to read " <u>Students, young families persons with disabilities, farmworkers, seniors and others living on low incomes need affordable housing, some designed specifically to meet their needs.</u> "	A change to this effect was made.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

357	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 85, last point, lack of funds are a barrier, as well as the inefficient and misuse or non-use of resources dedicated to affordable housing development.	A lack of funds is discussed in the section on housing for lower income residents. However, we do not have information on the inefficient and misuse or non-use of resources, so this information was not added. However, the chapter does include an action encouraging the lawful and efficient use of funds.
358	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Fees in the region are relatively high compared to what? Other regions? How much higher?	This statement was removed.
359	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 86, first paragraph, say how many people are on Section 8 waiting lists Countywide.	This information was not available in time for the printing of the draft RCP. It will be included in future updates.
360	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 86, 3rd paragraph, land needs to be developed at 30+ du/acre (not 15 - 30)	Information about density was removed.
361	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 87, add information on housing for students, servicemen, and young families.	This information was added.
362	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 87, include unmet existing needs when discussing the need for new housing (overpaying, overcrowded, substandard)	A reference to this will be included.
363	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 88, change first heading to "Need for <u>Conservation</u> , Preservation, and Rehabilitation. Adding more units will not resolve our housing shortage if existing units are lost as new units are added. Conservation refers to saving existing housing stock (primarily rental units) from demolition and conversion (i.e. to condominiums)	This information was added.
364	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Displacement occurs first when remodeling or redevelopment forces their temporary relocation and later when they are priced out of their old neighborhoods following gentrification.	No discussion of temporary relocation was added, as this is a less serious issue than the permanent loss of housing.
365	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change Goal 1 to read "Provide a variety of affordable and quality housing choices for people of all income levels and abilities in each community throughout the region.	A change to this effect was made.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

366	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change P.O. 1 to read "especially <u>higher density</u> multi-family housing	A change to this effect was made.
367	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change P.O. 2 to read " and mixed use <u>and diverse</u> communities.	A change to this effect was made.
368	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change P.O. 3 to read "interregional <u>and intraregional</u> commuting."	A change to this effect was made.
369	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change P.O. 4 to read " <u>Conserve</u> , preserve, and rehabilitate"	A change to this effect was made.
370	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change Action 1 to say "mixed <u>income</u> and use"	This change was not made, as this reference is specifically to zoning for mixed-use housing. Identification and rezoning of sites is not necessary for the location of mixed-income housing.
371	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change Action 4 to say "and other topics <u>to educate the community and develop consensus regarding solutions</u> "	Actions are written to state how a goal or policy objective will be met, not why the goal needs to be met. No change made.
372	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change Action 3 to say " <u>conserve</u> , rehabilitate..." "apartments <u>as affordable to lower income households.</u> "	A change to this effect was made.
373	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change Action 7 to say "residents as <u>demolition, conversion and redevelopment occurs.</u> "	A change to this effect was made.
374	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - Change Action 1 (funding) to say "the <u>lawful and</u> efficient use of existing funds."	A change to this effect was made.
375	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 90 - add action under funding "Educate municipalities about the importance and value of an adequate stock of affordable housing (i.e. the relationship between affordable housing and the ability to attract, retain, and expand the employment base)	This action is too specific, and would fall within the broader action of "Implement public education programs, showing positive examples and benefits of affordable and multifamily housing, and mixed-use developments.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

376	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 76, paragraph 8, a serious problem in older housing is lead point.	This is discussed on page 89, as well as in the social equity chapter.
377	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Figure 4C-1 - this is an odd comparison. Why not compare it to percent of households who could afford a home?	These statistics do not go back far enough. Also, this figure is meant to demonstrate that housing prices are rising dramatically while household income remains relatively the same.
378	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 77, 2nd paragraph, add a statement that rental stock is disappearing due to demolitions and conversions. We are losing affordable units as publicly subsidized units convert to market rate. Nearly 10,000 federally subsidized units alone are at risk of converting between 2008 and 2028.	This is discussed under "need for maintenance, preservation, and rehabilitation"
379	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 79, paragraph 5, line 8 state "supportive/transitional housing for people if they are able to secure treatment programs or receive supportive services." The way it is stated now implies that there are enough spaces available in rehabilitation to meet the need for these services, which is not true.	This paragraph does not imply that there are sufficient rehabilitation programs or supportive services. No change will be made.
380	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 79, last paragraph, state how long the trip is (in miles) for those crossing the border from Mexico and how long they are spending on their commutes.	This information is not available.
381	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 83, first paragraph, add the word "should" throughout - , "Local jurisdictions can and <u>should</u> adopt inclusionary housing programs.... Density bonus and second unit ordinances also <u>should be used to</u> provide additional affordable housing. Local jurisdictions <u>should</u> set aside a higher percentage.... other funding sources <u>should be used to address</u> housing needs from a local perspective.	With the exception of those programs required by state law (like density bonus and second unit) the decision as to which housing programs are the appropriate tool for increasing affordable housing should be left up to the individual jurisdictions.
382	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 83, 2nd bullet point, there are ways for developers to include lower and moderate income affordable units with increasing cost of market rate units, including the density bonus program. This bullet point should address that.	This is meant to be a brief example, but gentrification, and actions to reduce it, are included later in the chapter.
383	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 84, Construction Defect Litigation - It should be stated that poor design and construction led to the proliferation of lawsuits. And, some, not "the majority" of builders and insurers pulled out of the multifamily for-sale market.	There are two sides to the CDL argument, and this paragraph was deliberately written to be neutral. The majority of builders and insurers did pull out of the market, and are just now beginning to return.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

384	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Page 85, first bullet point, add "historic large lot residential zoning" to reasons for high land costs.	Low density zoning is discussed as its own bullet point.
385	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 86, it isn't true that higher densities allow for lower land costs. High density residential land is more expensive than low density. Land needs to be reserved with a guarantee that affordable housing will be developed on it.	Higher density zoned land does allow for lower per unit development costs.
386	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Lack of political will also plays a role in plan development.	Lack of political will is due to a variety of the factors listed in this chapter, including community opposition and the fiscalization of land use.
387	3/1/04	notes	Catherine Rodman, San Diego Advocates for Social Justice	Pg. 89 - housing discrimination - there are also asthma risks	Health risks are described in more detail in the Social Equity and Environmental Justice Assessment chapter.
388	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xx, "From Local Plans to a Regional Framework": This section should discuss in more detail the compacts that will be developed to connect planning authorities sub-regionally and ensure that local jurisdictions follow through with their obligations to plan for growth and facilitate the provision of housing. The discussion of these compacts should address the specific elements the compacts will have to accomplish this.	The level of detail included in the Executive Summary is sufficient. A general description of the elements of the compacts are included in the Implementation chapter. Compact elements will get more specific as SANDAG and local jurisdictions enter into compacts.
389	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xx, "This section should also discuss how the IRIS works and how it fits into the RCP."	The IRIS section of the Executive Summary provides greater detail about how the IRIS works and how it fits into the RCP.
390	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xxiii, Smart Growth Incentive Program: This program should be contingent upon more than just a commitment to the RCP's smart growth principles, it should be contingent upon successful and ongoing implementation of these principles with actual projects serving as the measuring stick.	This section was revised to reflect progress made with the Regional Planning Committee and its working groups on this issue between January and May 2004.
391	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xxv, Transportation: Moving People and Goods: The last chapter of this section should discuss how MOBILITY 2030 fits into the RCP and what role it plays as the implementation tool to achieve the RCP Transportation Goals, Policies and Recommended Actions.	A sentence was added to address this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

392	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xxv, Housing: The second paragraph of this section should discuss the "exporting" of households to Riverside and Baja California in the context of economic growth in San Diego without the concomitant provision of housing in San Diego leading to additional strain on our freeways and regional arterials.	Much of the second paragraph was removed in an effort to streamline the Executive Summary. However, a reference to building enough housing to keep up with our population and job was added.
393	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xviii, RCP Goals & Objectives: The first and fourth goals should begin with the word "facilitate" rather than "focus" and "provide".	While SANDAG recognizes that the RCP will not directly provide affordable housing, SANDAG disagrees with the suggestion to change the words included in referenced goals. The goals and policy objectives were developed through a public process, and SANDAG finds that they more clearly reflect the general intent of participants involved in the preparation of the RCP as written. While the listing of referenced goals was removed from the Executive Summary in an effort to streamline this chapter, the goals and policy objectives remain in the relevant chapters.
394	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xxxiv, IRIS: This section should include a discussion of what elements will be a part of the "compacts" that are proposed to connect smart planning and infrastructure financing. The RCP should include a standard or sample compact or MOU that will serve as a template.	It is premature to include a template of a compact in the final RCP. The RCP is the strategic long-term planning document for the region; compacts are one of several implementation tools, and will be developed in conjunction with the local jurisdictions as RCP implementation occurs.
395	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Lastly, we are concerned about the exclusion of school, fire, sewer and water districts from the RCP planning process. These districts are critical to the success of regional planning and we believe more of an effort should be made to incorporate them into the process.	The Public Facilities and IRIS chapters include an initial discussion of these topics; however, due to time constraints, a complete analysis of these topics was not possible. However, future updates of the RCP may address these topics in more detail.
396	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	We are concerned that, without contractual obligations for the local jurisdictions to comply with the Urban Form and Transportation Goals, Policies and Actions of the RCP and without performance-based standards to measure compliance, the smart growth planning will fail to materialize.	The RCP is an incentive-based and collaborative plan. As SANDAG and member agencies enter into compacts, commitments on the part of all parties will be clearly delineated. The text in the revised Implementation and Performance Monitoring chapters is more specific than the text in the draft chapters, and includes Strategic Initiatives and performance measures.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

397	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	We also believe that specific incentives for developers need to be identified and implemented to encourage the private sector to build smart growth projects.	The Transportation, Urban Form, and Housing chapters now identify examples of incentives that can be applied to encourage the construction of smart growth housing and infrastructure projects. The Urban Form chapter now includes principles for developing criteria for the smart growth incentive program. The principles call for providing greater weight to jurisdictions that provide local incentives.
398	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	We are concerned that the RCP's definition of Smart Growth may be too restrictive for some jurisdictions, such as the County, to meet, and these jurisdictions will receive inadequate funding for needed infrastructure improvements.	The Regional Planning Committee and its Working Groups developed a matrix of smart growth classifications that provides opportunities for all jurisdictions to participate in implementing smart growth. County of San Diego staff have identified several unincorporated communities that may qualify as smart growth opportunity areas. The matrix is included in the Urban Form chapter.
399	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 284, Intergovernmental Review: It may not be appropriate for SANDAG to assess individual development projects. This is the function and jurisdiction of the permitting agencies. Instead, SANDAG should assess the performance of local jurisdictions under the compacts for consistency with meeting their allocated population growth. The lag and lead indicators should be periodically reviewed for each city and the County to provide the basis for this assessment.	SANDAG is required by federal law to administer an intergovernmental review program (Executive Order 12372) in which it comments on potential impacts of proposed projects. It is not SANDAG's intent to collect and report upon indicators for each individual jurisdiction. SANDAG agrees that a monitoring component should be built into each compact as it is developed to track implementation progress.
400	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 26, Preferred Planning Concept, Policy Objective #4: Coordination among jurisdictions on subregional and regional planning must be binding and contractual, otherwise regional solutions are at risk of either failing to materialize or being subject to broken implementation. The importance of this should be emphasized in the RCP.	SANDAG is not a regulatory agency and does not have land use authority. The RCP calls for coordination through subregional planning efforts and incentives; while roles and responsibilities included in subregional planning efforts will be delineated in the compacts, SANDAG assumes that jurisdictions that participate in subregional planning efforts will enter into the efforts in good faith.
401	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 27, Policy Objectives 5-7: Are these objectives to be carried out by local jurisdictions? If so, this should be clarified.	These objectives are discussed in more detail in the Transportation chapter. The revised Implementation chapter, which includes Strategic Initiatives, specifies responsible lead agencies and time frames.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

402	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 28, Smart Growth Incentive Fund: This section should discuss what constitutes a "proposal" that meets the urban form and design criteria. Is this a reference to plans like the City of Villages or is this a reference to the approval of specific smart growth projects? The incentive program needs to go beyond land use policy changes in order for it to be effective. Funding through the program should be contingent upon a comprehensive effort to implement smart growth land use policies, add density to land use and zoning maps, and approve specific smart growth projects.	SANDAG's Regional Planning Committee and its Working Groups have developed a matrix of smart growth classifications, guidelines for strengthening the connection between local and regional plans (including planning implementation tools), and principles for the smart growth incentive program that are intended to result in the implementation of actual smart growth projects. These have been incorporated into the Urban Form and Implementation chapters.
403	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 28, Transportation...: Before SANDAG updates the project evaluation criteria of the Regional Transportation Improvement Program to better reflect the RCP land use policies, assurances should be in place that will make smart growth development a reality.	Transportation projects that would receive priority points due to related smart growth development will require the development and/or jurisdiction to demonstrate some form of agreed commitment to meet the smart growth land use definitions.
404	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xvii, "Our Current Path": This section should discuss what percentage of the projected population growth is "births over deaths" versus the percentage that is in-migration and whether these percentages are predicted to change over the next 30 years. This section should also discuss how our strong local economy and its developing industries are fueling the in-migration.	The level of detail included in the Executive Summary is sufficient; however, the suggested points have been added to Chapter 3, Overview of the San Diego Region. About 2/3 of the 2000 to 2030 growth is expected to be natural increase. However, this is a complex topic. Natural increase includes not only the children born to people living here now, but the children born to people who will move here in the future as well.
405	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	An accurate estimate of the region's housing capacity is critical to the successful implementation of the RCP as well as MOBILITY 2030 and the IRIS. The Executive Summary of the RCP should discuss both the results of the modeling done to determine housing capacity and the assumptions used in the modeling. An expanded discussion of the housing capacity estimate and the assumptions used to develop it should be included in the Housing section of Chapter 4. The Housing Section of Chapter 4 should also discuss the method SANDAG uses to determine housing capacity, in essence how the housing capacity model works.	While SANDAG agrees that an accurate estimate of the region's housing capacity is important to the success of the plans' implementation, the Executive Summary is meant to serve as a general overview of the document, and as such, is not the place to discuss modeling assumptions. A discussion about modeling assumptions and housing capacities has been added to the Overview of the San Diego region chapter (see response to comment 428).
406	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xxiii, Private Sector Participation: What specific incentives are contemplated? Incentives, such as reductions in parking requirements and per-unit fees, by-right minimum densities, and permit streamlining should be identified in the subregional compacts.	A discussion of incentives was added to the "Local Regulatory Programs" section of the Housing chapter and the "Providing Incentives for Smart Growth" section of the Urban form chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

407	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 174, Interregional Planning: The successful collaboration among the three regional government agencies may serve as a good example of how local cities and the County can work collaboratively on land use issues. What have been the successes of the IRP?	The section has been changed to add a discussion of the short- and -long range strategies of the IRP which indicates specific programs/projects which have been implemented.
408	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	This chapter should discuss the role that the federal and state governments play in funding interregional transportation and habitat preservation.	Language in reference to this issue has been added to the Healthy Environment chapter.
409	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xix, "A Better Approach to Planning", First Full Paragraph, Sentence beginning "As the region continues to grow...continued loss of agricultural land, open space and critical habitat." The term "critical habitat" is a legal and technical term referring to Critical Habitat for endangered species. It should not be used in the context of describing the impacts of growth when it is a classification given to certain types of habitat in certain areas. To use it as a general term for habitat is misleading and inaccurate.	This sentence was removed from the Executive Summary.
410	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 129, Industrial Clusters: This section should also discuss the role that local industries play in helping to form a "critical (employment) mass" so that the retail and service industries are sustainable. In general, the Economic Prosperity chapter should be careful not to view our regional industries in isolation, or emphasize the importance of one to the exclusion of another.	By competing in the international marketplace, traded industry clusters bring outside dollars into our region. This drives the local economy and sustains support industries, including retail. Clusters are related to the entire economy, so there is no exclusion. Instead, there is a prioritization of economic development resources towards those areas that provide the greatest impact. Language has been added to this section to clarify the role of clusters and other industries in the region. Retail, in particular, is highly dependent on the health of our region's clusters.
411	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 132, Third Paragraph: It is not clear what the recommendations are for changes to public policy that are needed to implement the Regional Economic Prosperity Strategy. It is also not clear what the Regional Economic Prosperity Strategy (REPS) is. The Strategy should be discussed in detail in this chapter and the policy recommendations should be identified and discussed as well. Are the "Key Issues" discussed in this chapter the core of the REPS? If so, this should be clarified.	The Key Issues, as well as the entire Economic Prosperity chapter, are based on the core findings and recommended actions from the Regional Economic Prosperity Strategy (REPS). Rather than reproducing the entire REPS, the major points were summarized in order to maintain consistency with other RCP chapters. For example, the Transportation Chapter does not reproduce the Regional Transportation Plan in great detail. Additional specificity for all of the RCP actions is included in the Implementation chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

412	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 127, Existing Setting, Table 4E.1: Although per capita income can be a useful statistic in measuring job quality and purchasing power, it can be rather imprecise when comparing one region to another. Median income, the income ranges, unemployment statistics, job availability and variety, and the percentage of the population in the work force, all in relation to the costs of basic living expenses and goods and services are more relevant. This section would benefit from a discussion of these statistics for our region.	A discussion of the merits of different economic indicators is not consistent with the focus of this chapter. However, SANDAG's Sustainable Competitiveness Index (SCI), another monitoring document, measures the progress of our region against 20 comparable metropolitan areas across the nation. The SCI includes a wider range of indicators, such as: unemployment rate, inflation, income distribution, educational attainment, and more. In addition, the Performance Monitoring chapter of the RCP includes a diverse range of indicators intended to address many of the issues raised in this comment.
413	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 253, Figure 7.6: Without a detailed explanation of the methodology SANDAG used to develop these distribution projections, it is difficult to accept their validity. The figure should also clarify that the population change is relative to the existing population in that area. This fact should be acknowledged in the RCP and Figure 7.6 should be revised to reflect a more realistic growth distribution outcome for the next thirty years.	The draft RCP included SANDAG's preliminary 2030 regional growth forecast. The final RCP includes the Final 2030 Forecast. Map 7.6 is a graphic representation of the regional growth forecast adopted by the SANDAG Board for planning purposes. The forecast allocates population growth based on existing general plans from all of the local jurisdictions. For more information on the methodology used, please refer to the forecast documentation materials, available from SANDAG. The text has been revised to address this comment.
414	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 268, Charts 5: It is not clear why solid waste generation is expected to grow four times faster than the population growth. With recycling programs growing and with long-term studies showing a steady decrease in the amount of solid waste generated per person over the past century, this does not seem like a correct assumption. Is it solid waste expenditures that Chart 5 is reflecting?	The solid waste generation estimate is based on a linear extrapolation of estimates from the Integrated Waste Management Plan, Countywide Siting element (final draft). According to the County of San Diego, waste generation per person has not declined, although recycling has contributed to a decrease in the stream of waste entering landfills. The region is near its mandated 50% goal for waste diversion/recycling and Chart 5 includes the impact of this diversion. Given increasing population forecasts, there appears to be no reason why the amount of waste sent to landfills should decline any further without a significant increase in diversion rates. We have revised the chart to include two projections: an estimate of total waste generated in the region and the waste stream sent to local landfills. Both graphs account for recycling efforts.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

415	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 244, Managing Demand..., third and last bullets: The third bullet should clarify that it is "infrastructure-dependent services". The last bullet should include energy-savings measures in construction materials, home appliances, and photovoltaic cells.	We have added energy saving measures to the bullet list. It is not clear what you mean by "Infrastructure dependent services."
416	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 249, Table 7.1: Transportation revenue sources should include development impact fees.	The table has been updated to reflect this comment. In addition, we have added impact fees as existing revenue sources for other areas shown in the table, including: water, wastewater, education, and parks and open space.
417	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 255, first paragraph: The first sentence of this paragraph gives the impression that the RCP is expected to fail. With regard to 30% of the growth between 2020 and 2030 expected to occur in the unincorporated area, what is this population number estimated to be?	The paragraph suggests that if the RCP fails and we continue according to existing general plans, more growth will occur in the unincorporated areas. The 2030 final forecast represents existing plans and policies. Therefore, without changes to current plans, more growth in the unincorporated area is the likely outcome. The region is forecast to add approximately 101,225 people in the unincorporated area between 2020 and 2030, about 31% of regional population growth during that time period.
418	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	With regard to Chart 6, in light of energy conservation measures increasingly being incorporated into new homes and businesses and with steady growth in the use of photovoltaic cells, this Chart also seems counter-intuitive. Again, is it expenditures that are expected to grow at such a high rate? Please clarify the reasons why the growth estimates in these charts seem so out of scale with the population growth.	The source of SANDAG's projection is "Energy 2030: The San Diego Regional Energy Strategy, May 2003" from the San Diego Regional Energy Office. Although it is difficult to project energy use thirty years into the future, it is recognized that per capita consumption is increasing due in part to the increased availability of, and reliance on electronic devices. While technological advances can create efficiencies in energy use, per capita use is growing at an increasing rate.
419	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 242, Linking Capital Budgeting and Strategic Planning: This section should discuss what role the compacts could play in establishing the coordinated "vertical" framework for Capital Improvement Programs.	The role of the compacts is described in the Implementation chapter and will continue to be refined as the RCP is implemented.
420	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 140, State-Local Fiscal Reform: Please see our comments regarding "Fiscal Inequalities" on page 84.	The revenue from retail centers goes back to the location where it was collected/spent, not necessarily to where housing is located. Therefore, there is not a sufficient amount of revenue available for housing, and housing continues to be viewed as a fiscal loser by municipalities.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

421	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 52, Figure 4B.1: Taken together, the numbers add up to over 100%, for both 1990 and 2000. How is this possible? Are some commuters alternating between the various forms of travel to work? Please explain.	Figure 4B.1 has been changed to show the correct transit percentages of 3%.
422	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 53, Figure 4B.2: More explanation is needed about how these statistics were derived and what is causing the disproportionate increase in vehicle miles traveled relative to population and employment growth. Is this a function of the nature of existing development in the region having an uneven effect on the availability of land for employment centers versus new homes? Have existing employment centers been better able to accommodate expansion while existing neighborhoods and communities have been less able or willing to do so, forcing residential development to be further away from employment centers? Is it possible that the northern and southern cities in the region had more land for development while the City of San Diego had less but the City of San Diego provided a more attractive environment for regional employment centers? Has this problem been affected by any imbalance in the types of jobs being generated in the various employment centers relative to the types of housing in or near these areas?	A general description of the data supporting the trends in Table 4B.2 has been added to the text.
423	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	It would be helpful to understand what SANDAG has determined to be the major factors leading to the disproportionate increase in vehicle miles traveled relative to population growth and how these factors relate to the projection of how the relationship between vehicle miles and growth will change over the next thirty years. What impact would implementation of SANDAG's smart growth scenarios have on this growing problem?	The added explanation for Table 4B.2 mentioned above addresses this comment. In relation to transportation, implementing smart growth would reduce interregional commuting, VMT, miles of congestion, etc. These measures are included in Table 4.1.
424	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 68, Aligning the Timing...: While it is essential to align the timing of transportation projects with the phasing of related development, in most areas this has not occurred. How does SANDAG propose this be done? This section should elaborate on this issue.	Additional language has been added to illustrate how better timing may be accomplished.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

425	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 68, Setting Priorities..., first bullet point: The rationale for the principle that a single set of criteria to evaluate and compare all regional transportation projects should be discussed. Will projects be evaluated based on whether they meet all the criteria, or are the criteria to serve more as guidelines for identifying important regional projects (based on whether they fit within the criteria)? Some projects might not measure up as well in a "scoring" system, but because of the traffic volume they will serve and/or because they may be the only transportation route or alternative to the area(s) they serve, their importance may not be entirely reflected by a score.	This bullet has been restated to reflect that in the next update of SANDAG's transportation project evaluation criteria, key policy themes from the RCP will be considered. The criteria for ranking projects is intended to weigh factors that affect the need, timing, and importance of a transportation project. It is expected that the criteria will be revised in FY 05 and be used in the next update of the RTP.
426	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 71, Policy Objective 7: "...recognizing the need for transportation improvements elsewhere in the region" is different from prioritizing these improvements and providing adequate funding. Adequate funding for transportation improvements outside Smart Growth Opportunity Areas (SGOA's) should be prioritized in proportion to the need, not based on the fact that it may be outside a SGOA.	Policy Objective #7 in the Transportation chapter has been revised to read: "Balance priority of serving regional roadway and transit investments in smart growth opportunity areas with the recognized need for transportation improvements elsewhere in the region." All projects will be reviewed and ranked for funding.
427	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 63, Congestion Management Plan: While it is important to encourage infill (with "infill opportunity zones"), most of these sites are not within one-third of a mile of existing or future transit stations, particularly in the unincorporated communities. Although transit is a part of the solution to congestion, it is not the only solution. It may be a small to negligible part of the solution in most areas with infill potential. Therefore, maybe qualification as an "infill opportunity zone" should not be contingent upon being within one-third of a mile of an existing or future transit station. This qualification could eliminate a lot of good infill sites.	Senate Bill 1636 (Statues of 2002) established the 1/3 mile definition for infill opportunity zones and only applies to areas proposed to be exempt from the Congestion Management Program level of service standards. Outside of the RCP, the criteria of distance from a transit station will be evaluated in the definition and identification of infill opportunity zones.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

428	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	We are not clear on the methodology used to estimate the housing capacity number of 314,000 units, and, therefore, we are not convinced that SANDAG's population distribution estimates are accurate.	Capacity estimates for the 18 cities are a joint effort of SANDAG and the local planning staffs. Detailed, large-scale maps of existing land use, planned land use, and potential areas of redevelopment (change of use) or infill (intensification of the existing use) are reviewed by local staffs. The planners indicate where within each planned density range development typically occurs, which often differs between vacant land and redeveloped land. Edits are made to the GIS databases, and a new map and capacity estimate are produced. This process is reiterated with each city until they agree that the estimate is reasonable and realistic. For the unincorporated area, we used the GP2020 population targets (in effect, a predetermined capacity), and the "footprints" and the December 2002 Working Copy land use map for distribution. A more detailed explanation is provided in the document <i>Final 2030 Forecast Process and Model Documentation</i> , available on the SANDAG Web site.
429	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 16, Future Trends: The last paragraph of this section states that the forecasted population, job and housing growth "is based on currently adopted land use plans and policies of the 18 cities and.... for the unincorporated area." Land use plans and policies are not a valid way to forecast any of these statistics. Land use plans and policies do not control the amount of population, job or housing growth. At best, they provide a framework for where it goes. The following section "Meeting Our Regional Housing Needs" reinforces this fact. The last paragraph of this section, "Future Trends", should be rewritten to conform to the conclusions reached in the following section, "Meeting Our Regional Housing Needs".	It is true that local land use plans and policies do not necessarily affect population or job growth, as concluded in the report cited in Chapter 3. However, they do determine where housing can be located, the structure type, and the allowable densities. The forecast reflects these spatial distributions and unit yields, and then assumes appropriate household sizes based on historical data and future demographic trends. The result is a forecast of population. SANDAG has used this general approach to forecasting since 1972 with good results.
430	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 17, Population Trends: It would be helpful to understand why the forecasts predict population growth to taper off. This section should also discuss whether or not previous growth forecasts have been accurate and provide the reasons why they were or were not. The RCP needs to look at an approach that will provide enough housing for population growth.	Information on why the population growth will taper off has been added. All previous forecasts, dating back to 1972, have been reasonably accurate - typically within 5 percent.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

431	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	<p>Page 19, Population Trends, Figure 3.2: This figure leads one to question why significant to major fluctuations in growth rate in the last twenty years will be absent in the future. In light of its apparent inconsistency with previous growth rates, the projection of future growth rates could be seen as less reliable. Is it the case that past growth rates were more a function of economically-stimulated population growth relative to the existing population; whereas, although economically-stimulated population growth may remain steady, in the future it will be a smaller percentage of the total existing population (and instead the less volatile internal growth rate will constitute a greater and greater share of the total growth rate)? If so, this section should elaborate on this fact. Whatever the reasons, the apparent inconsistency should be addressed.</p>	<p>This information has been added. The short answer is that the historical data is real, and precisely reflects what happened in the past, including any extraordinary circumstances such as the unusually serious recession of the early 1990s. Forecasts do not predict such extremes, unless there is reason to. Our forecasts reflect a more normal business cycle, and by definition do not include unforeseen or unexpected events. Also, the decline in future growth rates is due in part to simple demographics - specifically, the baby boomers starting to die.</p>
432	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	<p>Page 20, Housing Trends: This section predicts that more than half of the units expected to be built by 2030 will be multifamily. In light of the ongoing construction defect litigation, a region-wide lack of land zoned for multifamily, and a nearly universal visceral opposition to higher densities in existing communities leading to a lack of political willingness to approve multifamily projects, on what is this prediction based? Demand alone will not lead to affordable multifamily units if these insurmountable barriers are not removed or overcome.</p>	<p>The forecast does not take into account the impacts of construction defect litigation or potential community opposition. In effect, the forecast assumes these barriers will be overcome in time. It does, however, consider remaining single family and multifamily capacities under current land use plans, and does not exceed them. Also, as vacant single family land becomes ever more scarce, redevelopment - with its multifamily densities - is expected to play an increasingly larger role.</p>
433	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	<p>Page 25, Growth Projections: Did the smart growth analyses address whether the land falling within the one thousand-foot radial zones around transportation nodes is developed or vacant? Developed areas, unless they are part of a redevelopment district, should be excluded from any analysis of smart growth development potential. The computer models do not take into consideration land use processes in jurisdictions.</p>	<p>Each transportation node was assigned one of seven future land use "templates" based on its current land uses, including vacant land. The amount and type of future development or redevelopment varied for each template. No assumptions were made regarding local land use processes or other potential issues such as construction defect litigation or community opposition. The purpose of the analysis was to see the potential impacts if the region were to aggressively and successfully embrace smart growth.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

434	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 26, First Paragraph: What impact would localized traffic impacts from smart growth high density development have on the amount of smart growth that actually occurs over time?	This question is very hypothetical, and the answer, if there is one, probably depends on people's experiences with and perceptions of specific projects. Mission Valley, though not necessarily a perfect example of smart growth, has seen a great deal of high density development with associated local traffic impacts. Yet development continues there.
435	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	The Performance Monitoring Program needs more development in order for it to be effective. Lag and lead indicators should focus on the areas local governments can have the most impact, such as land use and transportation. These indicators should also be monitored for each jurisdiction and possibly subregionally to understand which jurisdictions are implementing effective land use policies and regulations and following through on their obligation to accommodate the population growth and which jurisdictions are lagging in this effort. SANDAG should also consider building performance under certain indicators into the proposed "compacts".	After the release of the draft RCP, the Regional Planning Committee and the Technical and Stakeholders Working Groups worked together to develop specific performance indicators for each topic area, and these have been incorporated into the Performance Monitoring chapter of the final RCP. The indicators are regional in nature. The compacts will reflect individual jurisdictions' efforts toward implementing the RCP's goals and objectives.
436	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Under-developed and isolated or remote lands should be examined carefully to determine their real development potential within the lifetime of the RCP before including them in the model. Lands falling outside of the County Water Authority Boundary will not contribute significantly to meeting the region's housing demand and should be largely excluded. Small isolated backcountry communities like Julian and Boulevard also fall into this category. Borrego is a special case. Although it has experienced significant growth in the past 20 years and is currently zoned for a lot more, it does not have the infrastructure, water resources or economic conditions to support much more growth. The determination of Borrego's housing capacity should be carefully and conservatively estimated. It is also only remotely connected to our region and this fact should be emphasized.	Agreed, and the forecasting process takes these concerns into account. Just because isolated backcountry areas have capacity does not mean that housing units will be allocated there in the forecast. The way the models work, those areas "compete" for housing with all other areas of the region where capacity remains. If the other areas - including Riverside County and Baja - are closer to jobs in terms of time or distance, future housing is more likely to be allocated there. The majority of the region's remaining housing unit capacity in the year 2030 is in exactly those areas you describe.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

437	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Lands falling outside of sewer and water districts should be assumed to have development potential limited to less than one dwelling unit per acre and conservatively one dwelling unit per two or four acres, or whatever the more restrictive zoning would allow, such as one dwelling unit per 20 acres in backcountry groundwater dependent areas. Again, these areas should be largely excluded from the determination of capacity due to a lack of services and infrastructure. Vacant or under-developed land within areas with aging or over-taxed infrastructure should be excluded unless identified improvements will be in place within the next 30 years.	See response to comment 436 above. Also, the densities allowed by the County in those areas under GP2020 are very low.
438	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page xxxi, Social Equity and Environmental Justice Assessment: The San Diego region has not grown in the traditional sense because our landscape and existing urban layout do not permit it. A lot of growth has occurred between the Interstate 5 and 15 Freeways, hardly "sprawl" development. It would be a mischaracterization of the growth patterns in the San Diego region to label them as sprawl. And the social equity issues that the San Diego region faces should be examined carefully as to not instinctively link them to sprawl development.	While growth has, in fact, occurred between Interstates 5 and 15, growth has also occurred beyond I-15. SANDAG agrees that the region's social equity issues need to be examined carefully, and recognizes this point in its discussion of next steps regarding social equity and environmental justice.
439	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	It should be emphasized that the capacity estimate is only that. Actual housing production may not match this estimate. The capacity modeling should be compared to past housing production rates and reasonable estimates about future production rates.	The capacity estimate for a given area is a not-to-exceed figure for that area. See Comment 428 for an explanation of how capacities are derived. The 2030 forecast projects an average of 10,500 new units per year in the region, which is somewhat less than the average production rates we have seen since the recession ended in the mid-1990s.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

440	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Lastly, both the estimates of housing capacity and housing production should be discussed in the context of the rate of land consumption. The rate of land consumption is not directly related to housing production. Some areas may have higher production and less consumption with higher density development, others just the opposite. The RCP lays out a framework for reducing the rate of land consumption. The estimate of housing capacity in combination with reasonable assumptions about average densities should be checked against the availability of vacant and under-developed land and realistic assumptions about the rate at which this remaining land will be consumed. Past and recent trends in the rate of land consumption should also be considered.	Land consumption is directly related to densities, and those densities are specified in the general plans and zoning regulations. However, the densities are typically expressed as ranges. The local planners specified where in those density ranges development typically occurs. They did this separately for vacant land, under-developed land, and potential redevelopment land in their jurisdiction.
441	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	With the information provided in the footnote on the rate of land consumption below, how does SANDAG's estimate of 314,000 units of housing capacity fit with the estimated rate of land consumption? * Based on the data provided in Table 4A.1, approximately 1.8% of the total land area was used for new development between 1990 and 2003, which is about 0.14% per year. If this rate of consumption stays the same, approximately 3.8% of the total land area will be new development by 2030.	Table 4A.1 has been revised for the final RCP due to differences in land use category definitions between SANDAG's 1990 and 2003 databases. Land consumption is a factor of the density ranges expressed in the general plans and zoning regulations. The 314,000 capacity estimate reflects the local planners' specific assessments of where within those ranges development typically occurs based on the type of land (vacant versus redevelopment versus infill).
442	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Regarding the 51% increase in land for shopping center, this figure may hide the stagnation of older smaller commercial centers and businesses that remain in place but have lost business to the larger commercial shopping centers.	Agreed, however the table is simply intended to quantify land consumption over time, and the text makes the point about the fiscalization of land use. Jurisdictions continue to pursue commercial development, so even if there is stagnation, there is apparently a net gain in sales tax revenue.
443	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 227, Housing, third paragraph: This paragraph states that "currently 18 percent of residents have some type of disability" but it does not explain what qualifies as a disability. Do people with learning disabilities fall into this category? Although services and accessibility are certainly important issues that need to be addressed for persons with physical disabilities, it is difficult to find public places and businesses today that have not done more than an adequate job of doing so. This chapter should emphasize this fact by highlighting our success in addressing the needs of the physically disabled.	Page 265 of the final RCP includes a definition of disability, which does not include learning disabilities. Persons with disabilities still face many challenges in today's built environment, and organizations that serve this population have strongly stressed the need for the inclusion of discussions of the need for accessibility in the RCP. However, information about our success or lack of success in addressing the needs of the physically disabled was not able to be found for inclusion in this chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

444	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	General: This chapter should emphasize what has been done by local jurisdictions to address the issues raised, for example, strict zoning regulations on compatible uses.	Positive examples of ways that jurisdictions have addressed environmental justice concerns have been added to the Social Equity and Environmental Justice Assessment chapter.
445	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	With regard to building accessibility into housing, the Building Industry is working with local governments whose job it is to enforce these codes to design accessibility into homes and provide option packages to buyers with physical disabilities. Solutions need to be tailored to the individual as to avoid unnecessary construction measures and improvements that only add to the cost of the home but provide no benefit to the buyer. If a buyer does not need accessibility designed into the home, they should have the option to not have it to save costs. If the RCP is to address this issue among all the other issues, including housing affordability, it should avoid giving the impression that accessibility should be a "one size fits all" solution.	The principle of Universal Design is to make products and the built environment as accessible as possible to as many people as possible at little or no extra cost. The chapter is not promoting full accessibility for all homes, but rather that homes be built in such a way that they can easily be made more accessible if there is a need for it. As our population ages, it is especially important that we are designing homes that allow people to stay in them as they grow older.
446	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 77, Third Paragraph: While housing demand in relation to an inadequate housing supply is a major factor driving up the cost of housing, costly, time-consuming, and sometimes duplicative government processing and regulation, with the average time for approval growing steadily year after year, is also a major factor and this should be acknowledged in this chapter with recommended solutions provided.	The Housing chapter includes a statement that land use programs are often numerous and cumbersome, and a corresponding action to review governmental processes and fees, and to make changes as needed to ensure that they are not acting as barriers.
447	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 82, Self-Certification: This section should discuss recent efforts to move toward performance-based criteria.	A discussion of current performance-based legislative efforts has been added.
448	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 83, Key Issues, third bullet, "by-right housing without public review": Perhaps this is not a good characterization of the "by-right" argument being made. Most arguments involving the "by-right" idea are referring to "by-right" density under the zone. Certainly this does not mean however that the development project should not undergo public review.	Agreed. This bullet point was removed.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

449	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 84, Fiscal Inequalities: Looking at housing as a fiscal loser is only looking at part of the equation. Without residents (housing), there would be virtually no demand for goods and services (and no workforce); so retail centers in large part generate tax dollars because of the residential development they serve, typically surrounding them. Therefore, it is not accurate to say that housing does not pay for itself. This alternative view should be acknowledged in this section.	The revenue from retail centers goes back to the location where it was collected/spent, not necessarily to where housing is located. Therefore, there is not a sufficient amount of revenue available for housing and housing continues to be viewed as a fiscal loser.
450	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 84, Land Availability: It is not just the higher cost of infill land, but this combined with a lack of adequate density and typically strong community opposition and weak political will that make infill a risky and undesirable development option for many developers.	Community opposition is discussed in the "Reducing Barriers to Housing Construction" section. Low density zoning has been added as a barrier in this section. "Weak political will" is most often a result of community opposition and fiscal issues, and has not been listed as its own point.
451	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 85, High Land Prices: Land speculation is a response to land prices rising as a result of other much more dominant factors, but speculation itself is not a significant cause of escalating land prices. If anything, this conclusion is speculative, and it should be revised or removed because it is misleading and incorrect.	Speculation has been shown to contribute to the rise in land prices. This statement was not revised.
452	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 85, Lack of Funding: A lack of funding through subsidies is not the main barrier to providing affordable housing to low-income workers.	This statement was removed.
453	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 85, Moderate Income: It is a little troubling that the RCP is paying so little attention in this section to clearly what is the biggest part of the affordable housing problem. Most of the reasons cited as barriers to affordable housing for low-income families are the same barriers to providing affordable housing to moderate-income families. This section should discuss these barriers or maybe the two sections should be combined.	This section was rewritten so that the barriers to housing construction apply to all housing types. More emphasis was given to moderate income housing.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

465	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 89, Substandard Housing: Radon is radioactive decay from naturally occurring elements in the earth. It is typically a problem in basements with poor air circulation in places like the Midwest. It is not considered to be a significant problem in the San Diego region and it has almost nothing to do with substandard housing. Regarding the other risks based on the National Low Income Housing Coalition, to what extent are these serious risks in the relatively younger housing stock of the San Diego region?	The information on radon was removed. However, even with a relatively newer housing stock, the San Diego region still has been forced to implement lead-based paint detection and removal programs.
466	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	If the affordable housing problem is ever to be solved, local jurisdictions need to move away from fee-based, burdensome programs and toward incentive-based programs that translate into affordable housing actually getting built. Additionally, local jurisdictions should move away from targeting new development to finance the affordable housing solutions, ultimately targeting individual home buyers, when solving the affordable housing problem should be and is the responsibility of the larger society with the local, state and federal governments acting as facilitators, not arbiters.	The RCP does not advocate a one-size fits all approach to affordable housing production, but instead promotes alternatives that each jurisdiction should consider to determine how best to meet their housing needs.
467	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 81, First Paragraph: The reality is that affordable housing programs do exist, with the zoning for this higher density largely nonexistent.	The RCP states throughout that the region has not adequately zoned for multifamily land. This statement is meant to further stress the importance of multifamily zoned land to affordable housing development.
468	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 84, Government Regulations and Fees: They are also growing in time and cost, making them a growing factor in the housing crisis.	The Housing chapter includes an action to review governmental processes and fees, and make changes as needed, to ensure they are not acting as unnecessary barriers to housing construction.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

469	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 80, SANDAG's Role: With the County GP2020 Update, SANDAG's original population projections for the various communities of the unincorporated area were largely disregarded. Instead, the population projections were turned into "targets" and were established in large part by the community planning groups for each community with little regard for the factors listed in this section that SANDAG used to determine the original projections. SANDAG subsequently accepted and then began using the new projections for the various communities of the County. In light of this, what rationale existed for accepting these numbers when they were not derived using SANDAG's factors and methodology?	This is a discussion of the regional housing need allocation process, and a detailed description of the forecast would not be appropriate here. However, future housing need allocations will not be based solely upon the SANDAG forecast. For the 2005 - 2010 housing element cycle, the State Department of Housing and Community Development is requiring that the region plan for between 107,000 and 111,000 housing units, while the forecast only projects approximately 88,000 units for that period.
470	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	The third and fourth paragraphs of this section should expand on the fact that not all of the density planned for in the various General Plans will be developed over the next 30 years; in some places, a majority of it may remain undeveloped. The fourth paragraph of this section cites a capacity figure of 314,000 homes but does not indicate how this figure was determined. Is this estimate based on realistic assumptions about the various governmental, environmental and physical constraints to land development? If not, what is a realistic estimate of the housing capacity with these constraints incorporated? SANDAG's methodology for determining this number should be explained in detail to understand the reliability of the estimate.	See response to Comment 428. The capacity estimates take into account the fact that development is often not at or near the highest allowable density. This is what is meant by the local planners ultimately agreeing that the estimate for their city is "realistic."
471	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Chapter 4F: This chapter should include a separate section discussing local water, sewer, fire and school districts, and their role in subregional planning. This discussion should address the coordination among these districts with local jurisdictions having land use authority. The compacts that are proposed as part of the implementation solution should include these districts to the extent necessary to ensure that the expansion of existing and planning of new facilities is coordinated with land use planning. The RCP should outline guidelines (Goals, Objectives and Actions) for how this coordination should occur.	The scope of the RCP did not include consideration of these topics in detail. Future updates of the RCP could include more specific goals and policy objectives on these topics individually, and guidelines for how coordination should occur. The Implementation chapter describes the subregional planning program designed to strengthen the connection between local and regional plans at the subregional level. The proposed compacts are designed to implement the strategic initiatives at the local level.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

472	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Regarding the land consumed by residential onsite development, are open space preservation and park deducted from this total?	Yes.
473	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 39, Key Issues, Distribution of Land Uses...: This section refers to "previous analyses that have demonstrated the way land has been developed in the region over the past half century cannot be sustained..." These analyses should be cited. How do these analyses compare with our previous comments about the rate of land consumption?	Referenced sentence has been clarified. Data in Table 4A-1 has been revised.
474	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 43, Redevelopment, Infill, and Parking: This section should discuss incentives for developers such as reductions in parking requirements and fees, by-right minimum densities, et cetera, to better utilize land and foster use of alternative forms of transportation.	The Urban Form, Transportation, and Housing chapters include discussions of incentives that can be applied to encourage the construction of smart growth housing and infrastructure projects. Principles for developing criteria for the smart growth incentives have been added to the Urban Form chapter of the final RCP. The principles call for providing more weight to projects within jurisdictions that provide local incentives.
475	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 48, Funding: The sections addressing funding should discuss how the four SGOA categories will be funded by these programs, how these four categories of smart growth areas will benefit from the two types of funding. There is the perception that although the County, in the face of controversy over higher densities in the unincorporated area, has embarked on an ambitious effort to implement smart growth planning through the GP2020 Update, the various unincorporated communities still may not qualify for funding under the current criteria. Does SANDAG intend to use the Regional Transportation Network Funding and the Smart Growth Incentive Program Funding to fund smart growth development in the unincorporated area based on the densities currently contemplated with the General Plan 2020 Working Copy Map? If so, the sections addressing funding should clarify and discuss this.	This entire section has been replaced with a more detailed description of funding and incentives for smart growth, providing clarification on how the County of San Diego's General Plan Update effort relates to the broader regional smart growth planning efforts.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

476	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 48, Next Steps: This section should discuss the function SANDAG's Smart Growth working groups will play and it should emphasize that this process needs to be a collaborative effort involving local jurisdictions, community leaders and stakeholders.	Suggestion has been incorporated.
477	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 35, Existing Plans and Programs: The last paragraph of this section states that up to 65% less land (400,000 acres) would be consumed by implementing the Land Use Distribution Element of the Regional Growth Management Strategy. Although this is a substantial savings, the figure itself is highly misleading because it does not account for the large and increasing amounts of open space preservation that occur with development today. It appears to also assume that rural lands outside of the County Water Authority boundary would be completely developed over the next 30 years, which is not even remotely possible. To determine a more realistic estimate of land consumption, to begin with, the information in Table 4A.1 should be used to determine the average amount of land consumed per unit over the last thirteen years multiplied by the estimate of how many homes will be built over the next thirty years. Preservation, public and private open space, and parklands should be deducted from the acreage of land consumed per unit. With this information, more realistic assumptions can be made about potential savings in land through density increases.	The 400,000 acres includes only land on which residential development is allowed under the County's current plans - not GP2020 - and does not include any designated open space or other lands on which development is not allowed. That said, we agree that the figure can be misleading, because it assumes that all future population growth will be accommodated within the region's boundaries. The only way that could happen is if all developable land, including east of the CWA line, were utilized, and that will not happen. A more realistic figure would still be substantial, but less than 400,000 acres. Therefore, we have removed the reference to 400,000 acres.
478	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	When developing funding criteria, it is important to consider that smart growth in one community may be quite different from smart growth in another. Certain areas of the region should not be excluded from funding because they cannot achieve a high enough density in their smart growth development.	The final RCP includes a matrix of smart growth area classifications, providing a range of opportunities to implement smart growth, reflecting that smart growth is not a "one-size-fits-all" effort. The development of criteria, which will occur upon adoption of the RCP, will be associated with the matrix.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

479	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 46, Community, Town....: In order to avoid the potential feeling of disenfranchisement by communities not listed, all the communities and cities with Smart Growth Opportunity Areas (SGOA) should be listed. Unincorporated communities like Lakeside, Alpine, Valley Center, Twin Oaks and Bonsall all harbor potential Smart Growth Opportunity Areas.	The smart growth classification matrix added to the final RCP identifies specific communities within the region that typify the characteristics of each smart growth category, or that could if developed as planned. The examples were identified in cooperation with the planning staffs of local agencies, and are meant only to serve as examples of areas that might be designated as existing, planned, or potential smart growth opportunity areas. Final designation of smart growth areas will take place after the adoption of the RCP through a collaborative process that will include local planning and policymakers as well as stakeholders.
480	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	The RCP does not take into account the planning that has been done by the County with the GP 20/20 plan. It needs to consider the GP 20/20's planning for down zoning.	SANDAG and County of San Diego staff have worked to ensure consistency between GP2020 and the RCP. These efforts are reflected in the final RCP.
481	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 36: Local streets and roads need to take priority over mass transit. San Diego is too far from having a significant transit system that people utilize. People are going to continue to use their cars, therefore the RCP should focus on building streets and roads to alleviate traffic congestion. There should also be incentives for developers to build near existing mass transit stations.	The RCP encourages a more robust network of transportation services and choices, ranging from local streets and roads to regional arterials to freeways and highways. The RCP advocates more transit services along all of these types of corridors, and calls for incentives for higher-intensity development, particularly mixed uses, near existing and planned transit stations.
482	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 50, Funding: Funding Action 1 implies that smart growth development must be on the SGOA Concept Map in order to qualify for funding. Is this the case? If so, the relevant sections of the Urban Form chapter should discuss this fact. And if this were the case, how would a project or area qualify for inclusion on the Concept Map?	This action calls for prioritizing transportation and other infrastructure investments in areas that support smart growth as shown in the concept map. The final RCP includes a matrix of smart growth area classifications that will serve as the foundation for developing the smart growth concept map. During the next fiscal year, SANDAG will work with local jurisdictions and stakeholders to develop the concept map. The SANDAG Board will then take action on incorporating the concept map into the RCP.
483	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 32, Land Use Plans: The statistic that 1.5 million acres out of 2.7 million are currently developed is grossly inaccurate. It also conflicts with Table 4A.1, which shows that over 2 million acres are parks and open space, undeveloped, and in agriculture use. Military and water reservoir lands (such as Miramar, Camp Pendleton, San Vicente and El Capitan) are also predominantly in a natural state.	This stems from SANDAG's in-house technical definition of "developed." We understand that this is confusing and have changed the text to be consistent with most people's definition of developed.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

484	3/1/04	letter	Craig Benedetto and Matt Adams, Alliance for Habitat Conservation & BIA	Page 44, Coordinating Transportation and Land Use: Transportation infrastructure funding should be contingent upon a comprehensive effort by local jurisdictions to: 1. Implement land use policies and zoning regulations that facilitate smart growth development. 2. Coordinate their planning along regional arterials with service districts and adjacent cities through the use of binding "compacts". 3. Identify adequate vacant land for this smart growth development. 4. Provide incentives (such as reductions in fees and parking regulations, by-right density and permit streamlining) to encourage development of these sites. 5. Prioritize and approve projects that achieve the planned smart growth densities.	The general concepts included in the comment have been incorporated into the guidelines for strengthening the connection between local and regional plans, which is included in the Implementation chapter of the final RCP.
485	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	The EIR should include a section on to what extent the RCP is or is not growth inducing, and how the impacts can be mitigated.	The draft Program EIR does discuss growth-inducing impacts in both Chapter 3 (Project Description) and in Chapter 8 (Other Considerations Required by CEQA).
486	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	Page 5. 7-14. The RCP will result in significant alteration of streams, rivers, and wetlands unless specific measures are included to discourage alterations and degradations. As property values and development pressures increase, wetlands and waterways will face greater threats. Existing regulations are not adequate to protect them.	The Healthy Environment Chapter of the RCP makes specific recommendations which focus on protection of natural habitats and improving water quality. While local agencies are responsible for implementing local, state, and federal wetlands and species protection regulations, the RCP does encourage protection of these sensitive resources.
487	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	Page 5. 10-8, Section 5.10.2 - There should be a separate analysis heading on "Protecting our natural hydrologic system." It should be separate from "water quality". It has elements of flood protection, scenic value, water quality, and groundwater recharge.	Although SANDAG did not include a separate subject area in the RCP entitled hydrographic systems as suggested in the comment, the RCP does include a specific action to address watershed-level planning (RCP Chapter 4D).
488	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	The EIR should address the fact that the growth that this plan facilitates will require more sand and gravel. The extraction will have environmental impacts. Our regulations to manage that extraction are not adequate. The EIR should identify avoidance of mitigation measures to protect the rivers, water quality, and habitat impacts of that extraction.	The Program EIR does address issues related to water quality and implementation of best management practices to eliminate, reduce, or minimize future water quality impacts. Similarly, the RCP addresses the preservation of sensitive habitat areas that includes wetland habitats. The EIR does not address sand and gravel extraction issues that are regulated in the region and elsewhere.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

489	3/1/04	letter	Howard Blackson and Nicholas DeLorenzo, San Diego Council of Design Professionals	<p>Page 240 last paragraph: This is a lukewarm endorsement of what is an essential first step, and one of SANDAG's few opportunities to incentivize smart growth development, should be stated more forcefully. More specifically, the RCP should state unequivocally that:</p> <ul style="list-style-type: none"> * All SANDAG-funded projects should implement applicable smart growth elements to the fullest extent possible. * All SANDAG-funded transportation improvements should be prioritized based on their ability to further smart growth objectives. * All SANDAG-funded roadway projects should include safe, attractive, and convenient accommodations for pedestrian, bicyclists, and transit riders. * Immediately following adoption of the RCP, appropriate SANDAG committees should prepare funding criteria to implement these directives. 	New language has been added to the Urban Form and Transportation chapters regarding principles for developing criteria to fund smart growth projects, including concepts identified in this comment.
490	3/1/04	letter	Howard Blackson and Nicholas DeLorenzo, San Diego Council of Design Professionals	To make it more useful as an implementation tool, we recommend the IRIS emphasize specific forums, committees, or other entities that should be tapped or formed to create the needed plans.	Under future guidance from the SANDAG Board and RCP Working Groups, the specific number of forums, committees, or other entities will be determined.
491	3/1/04	letter	Howard Blackson and Nicholas DeLorenzo, San Diego Council of Design Professionals	Page 140, "fiscalization of land use" discussion: This discussion concludes that to address the 11-fold disparity in revenues between commercial and residential development and the resulting competition for retail development, the region must wait for changes in state law. This is a missed opportunity for the RCP. The Sacramento region has implemented a limited, multi-jurisdiction compact to address this issue, and SANDAG has an opportunity to broker a similar agreement for the San Diego region. This should be included as an interim goal, particularly given the state legislature's inability to focus on fundamental tax issues during the current fiscal crisis.	Although Sacramento had a proposed deal, we are not aware of any existing multi-jurisdictional compact. If you have any information on this topic, please provide it to SANDAG staff. The State legislature is currently considering SB1212, which is based on principles in SANDAG's fiscal reform proposal.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

492	3/1/04	letter	Howard Blackson and Nicholas DeLorenzo, San Diego Council of Design Professionals	We would suggest that the objective #3 to "reduce traffic congestion on freeways and arterials" is not practical, nor perhaps even desirable, as it appears to rely primarily on increasing roadway capacity.	Much of the reduction will be due to the increase in other modes (carpool, transit), improved efficiency of the system, and reduced demand in the peak period. We acknowledge both in the RCP and the RTP that we cannot build our way out of congestion.
493	3/1/04	letter	Howard Blackson and Nicholas DeLorenzo, San Diego Council of Design Professionals	We would suggest something like, "Congestion should be managed to help meet smart growth objectives." This opens the possibility of more effective strategies; such as coordinating high-quality transit services to siphon drivers from strategically located congestion choke points.	Please see response to Comment 508.
494	3/1/04	letter	Howard Blackson and Nicholas DeLorenzo, San Diego Council of Design Professionals	Deciding <i>a priori</i> that transit services will be funded primarily by additional user costs, while failing to impose similar roadway charges from driving, will further penalize the very behavior the RCP purports to encourage. Transit services should be priced in a manner that meets multiple goals of service delivery and encouraging ridership, in the context of prevailing resources dedicated to transit operations.	Neither the RTP nor the RCP propose to fund the expanded transit system solely by raising transit fares.
495	3/1/04	letter	Howard Blackson and Nicholas DeLorenzo, San Diego Council of Design Professionals	One element, which should be highlighted in the Urban Form Chapter, is the use of public art and other design amenities to enhance the pedestrian experience. We suggest adding the following bullet to the list of "Elements of Human-Scale Design" on page 40: "Public art, high-quality design materials, and other design amenities in areas of pedestrian concentration.	The "Elements of Human-Scale Design" box was inadvertently removed from the final draft RCP, and will be added into the Final RCP upon Board adoption of the RCP. The box will incorporate the concepts suggested in the comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

496	3/1/04	letter	Mayor Richard Earnest, City of Del Mar	<p>If the Regional Comprehensive Plan is to accomplish its goals for the region, measurable standards will be required to judge our progress. It will also be necessary that all agencies in the region incorporate the recommended policy objectives and actions into their local and regional plans as they update their General Plans and other policy documents in the future. Del Mar feels that participation in the process of identifying the criteria for success and in incorporating appropriate goals and policies of the RCP into future Community Plan updates are key elements to the success of the Plan.</p>	<p>SANDAG agrees. The Regional Planning Committee and its Working Groups worked together to identify measurable indicators to judge our progress. These annual and periodic indicators have been included in the revised Performance Monitoring chapter of the RCP, and short- and long-range "targets" will be developed upon the release of the baseline monitoring report this fall.</p>
497	3/1/04	letter	Mayor Richard Earnest, City of Del Mar	<p>As the smallest City in the region, Del Mar is also concerned about the criteria that will be used to judge the award of future funding for projects consistent with the RCP goals and policies. It may be that the standards set forth to assess the progress in various areas of the region will be tied to the criteria for receiving funding, but we feel this should be identified and discussed in the RCP or in an addendum document to some degree at this time. Essentially there should be some kind of recommendation in the RCP for appropriate "grading points" that would ensure equal opportunity for funding by every community, so that each community knows what to include in future project planning to be eligible for future project funding.</p>	<p>The Regional Planning Committee and its Working Groups worked together to identify a range of smart growth categories and opportunity areas. The revised Urban Form chapter includes a matrix that outlines the specific desired characteristics of smart growth areas. The matrix reflects that smart growth is not a "one size fits all" endeavor, and attempts to create opportunities for all jurisdictions to participate. The Urban Form chapter also articulates principles for developing criteria for smart growth incentives and includes actions for developing and implementing the incentive programs. At this time, the plan does not call for linking progress on performance indicators to distribution of smart growth incentive funds because performance indicators are intended to focus on the region as a whole, not on individual jurisdictions or subregions.</p>
498	3/1/04	letter	Thomas Mullaney, Friends of San Diego - 2	<p>The RCP has a important flaw: a failure to commit to a comprehensive plan for limiting sprawl and preserving open space. The plan emphasizes where new development should occur, and takes a nebulous approach regarding where growth should not occur. It avoids an approach that has been very effective in Oregon, Urban Growth Boundaries.</p>	<p>SANDAG does not have land use or regulatory authority, and as such, relies on local jurisdictions to implement the land use concepts contained in the RCP. The RCP supports the County of San Diego's General Plan update (GP2020), which preserves rural lands by locating much of its future growth near town centers and existing infrastructure. Additionally, the RCP supports local subarea planning efforts to implement the local habitat conservation plans.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

499	3/1/04	letter	Thomas Mullaney, Friends of San Diego - 2	The region needs a truly comprehensive open space plan that takes into account the many purposes for open space: * visual relief from urban development * water quality preservation - for drinking water and storm runoff * community separation and definition * recreation - passive and active * maintaining natural patterns of temperature and rainfall * avoidance of roads into outlying areas	The RCP recommends directing future population and job growth away from rural areas and closer to existing and planned job centers and public facilities, and recommends the development of an urban design best practices manual which will address issues of visual relief and community definition. The RCP addresses water quality preservation; and transportation systems for urban, suburban, and rural areas. Time and resource constraints do not permit review of current and future recreational opportunities and how to maintain natural patterns of temperature and rainfall.
500	3/1/04	letter	Thomas Mullaney, Friends of San Diego - 2	The draft RCP contains misleading statements about the majority of future residents being our children and grandchildren.	Demographers define two components to population change in an area: natural increase (local births minus local deaths), and net migration. About 2/3 of the 2000 to 2030 population increase will be the result of natural increase. By definition, that includes children born here to people who themselves were born here, as well as children born here to people who moved here 10 years ago, and those born here to people who will move here 10 years from now. This clarification has been made in the RCP.
501	3/1/04	letter	Thomas Mullaney, Friends of San Diego - 2	The draft RCP contains outmoded ideas about adding density for the purpose of accommodating forecast growth and reducing growth-related problems.	The RCP provides a framework to manage our expected population growth in a way that preserves and enhances our quality of life by promoting more housing, transportation, and employment choices near our existing or planned services, and transportation networks for our increasingly-diverse and aging population.
502	3/4/04	letter	Beth Fischer, Pardee Homes	The Draft RCP fails to define the term smart growth in a fashion that allows us to apply it on the ground.	The Regional Planning Committee and its working groups developed a matrix of smart growth area classifications, providing a more detailed and quantifiable definition of smart growth development within the region. The matrix was incorporated into the Urban Form chapter.
503	3/4/04	letter	Beth Fischer, Pardee Homes	Please place my name on your mailing list of persons seeking notices for future versions of the Regional Comprehensive Plan.	Done.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

504	3/4/04	letter	Beth Fischer, Pardee Homes	The Draft RCP seems biased in favor of infill at the expense of planned development in the suburban areas of the region. Indeed, the term "infill" at times seems to be used synonymously with smart growth. This emphasis in the Draft RCP does not take into account the challenges and costs of infill nor does it acknowledge the many examples of smart growth SANDAG identified in suburban areas during the Region 2020 strategy planning process (the City of San Diego's North City Future Urbanizing Area, for example).	The Urban Form and Housing chapters have been modified to reflect smart growth opportunities in currently undeveloped areas. Additionally, a smart growth classification matrix has been added to the Urban Form chapter describing features of smart growth in seven categories, reflecting that smart growth can occur in urban, suburban, and rural-type areas.
505	3/4/04	letter	Beth Fischer, Pardee Homes	In using infrastructure funding to encourage smart growth, you must not lose sight of your stated policy to accommodate planned growth. Your regional transportation obligations must be met. Funds used for smart growth incentives should be in addition to funds necessary to complete the regional system. There should be some recognition in the Draft RCP that funding of regional public facility needs on an agency/entity basis must take priority over the funding priority given to public agencies/entities that implement smart growth principles.	The Smart Growth Incentive Program discussed in the Urban Form chapter is a separate program from the effort to revise the transportation evaluation criteria to incorporate smart growth as a factor in the prioritization of transportation funding.
506	3/4/04	letter	Beth Fischer, Pardee Homes	The Draft RCP seems to take infill as an article of faith without comprehensively analyzing feasibility and alternatives. The Draft RCP claims to include a comprehensive strategy for the future. Such a comprehensive strategy must be based on a much more rigorous analysis. Realistic estimates should be made of the amount of land available for infill. Costs should be documented; community concerns must be acknowledged and dealt with forthrightly. Smart growth alternatives to infill should be identified.	The RCP promotes infill/redevelopment as one approach for meeting our housing needs, reducing land consumption, and promoting additional transportation choices. In updating their housing elements, each jurisdiction undertakes an analysis to determine the amount of available land for development, including a realistic estimate of potential infill / redevelopment. Updates to housing elements are subsequently incorporated as land use assumptions into SANDAG's regional growth forecasts. Estimating the costs associated with infill development is too detailed for inclusion in the RCP.
507	3/4/04	letter	Beth Fischer, Pardee Homes	We believe that the Draft RCP should reference, at a minimum, Pacific Highlands Ranch as a smart growth project/area.	A smart growth classifications matrix has been added to the Urban Form chapter. The matrix includes Pacific Highlands Ranch as an example of a Community Center.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

508	3/4/04	letter	Beth Fischer, Pardee Homes	No one can dispute that infill should be an important component of any smart growth strategy. Nevertheless, the Draft RCP is in danger of overstating the case for infill while ignoring the importance of planned suburban development in meeting SANDAG's growth forecasts.	This point has been incorporated into the Urban Form and Housing chapters of the RCP.
509	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	IRIS Appendix, Page 219, 3rd paragraph: This whole paragraph is confusing and should be removed. For example "Even adopting just one [diversion] program can divert a significant amount of waste from disposal in regional landfills."	The paragraph suggests that the region should consider programs that have proven to be successful in other areas. The text has been revised to clarify this point.
510	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	IRIS Appendix, Page 214, 4th paragraph, 1st sentence: Please remove the first sentence of this paragraph and replace with the following: "Solid waste landfills in the San Diego region are regulated by several agencies, including the California Regional Water Quality Control Board (RWQCB), County of San Diego's Air Pollution Control District (APCD), City Local Enforcement Agency (LEA), California Integrated Waste Management Board (CIWMB), and County of San Diego's Department of Environmental Health (DEH)."	Comment was incorporated.
511	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	IRIS Appendix, Page 215, 5th paragraph, 1st sentence: Please remove "San Diego region's" and replace with "County of San Diego's."	Sentence was changed to read, "Due to the privatization of the County of San Diego's four landfills by Allied Waste Industries and the private ownership of residential..."

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

512	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	<p>IRIS Appendix, Page 216, 1st paragraph: Please remove this paragraph. A re-written paragraph is as follows: "Solid waste collection and disposal are funded by an array of fees including tipping fees, franchise fees, and AB 939 fees. Landfill operators charge haulers and the general public "tipping fees" in order to dispose of waste in their landfills. Tipping fees in the San Diego region currently range from \$22/ton to \$41/ton, which is within the range of other regions in California. All jurisdictions (except the City of San Diego) charge monthly residential trash-collection fees to cover tipping fees. These fees may include transportation costs, curbside recycling costs, and green waste costs. The City of San Diego is restricted from charging for residential trash collection services due to the People's Ordinance, passed in 1919 by the City's voters. As a result, the City pays for its single-family residential trash collection services from its general fund. The City of San Diego does not have a commercial refuse collection program."</p>	The paragraph has been changed to reflect the sentence at the end of the comment.
513	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	<p>IRIS Appendix, Page 216, 3rd paragraph: Please remove this paragraph. A re-written paragraph is as follows: "AB 939 fees are collected by local governments to raise fees specifically for the costs of implementing their waste diversion programs to comply with the AB 939 law. Each jurisdiction uses the countywide AB 939 implementation fee monies to fund waste diversion and recycling programs. For the City of San Diego, AB 939 fees are collected from customers at the Miramar Landfill and directly from franchised haulers."</p>	Paragraph has been changed to reflect the comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

514	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	Page 217, 4th paragraph: Please completely remove all portions of this paragraph pertaining to Sycamore. There is no "lease agreement." This whole paragraph is completely inaccurate regarding the Sycamore Canyon Landfill.	Paragraph has been changed to reflect the comment.
515	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	Page 217, 6th paragraph: Please completely remove this paragraph. The Sycamore Canyon Landfill is not "under debate."	Paragraph has been changed to reflect the comment.
516	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	IRIS Appendix, Page 215, 6th paragraph and Exhibits 6-8 (pgs 225-227): ESD questions the accuracy of the budget dollars stated in this paragraph and in the Exhibits 6, 7, and 8. Why is the City of San Diego's Environmental Services' budget included in this planning document? Why is ESD being compared to the County of San Diego and does not include similar details with the expenditures listed? ESD would like to have this paragraph and the Exhibits 6, 7, and 8 removed from this document.	The information included in the IRIS is taken from the City of San Diego's adopted FY 2003 budget. SANDAG has worked with the City's Environmental Services Department (ESD) to represent their budget according to their request. ESD's budget is included because ESD has responsibility for waste management. We do not compare the City to the County. We report budget information as described in the budgets. It is important to include this information because the region needs to know what the public expenditures are for Capital Improvements and Operations and Maintenance for waste management.
517	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	IRIS Appendix, Page 218, 2nd paragraph: ESD supports the position of TAC regarding this paragraph.	The RCP is a long-range planning document that is to be bold and ambitious. Stating that the region will exceed the state-mandated 50% rate and work toward a 75% diversion rate in the next 30 years is consistent with that concept.
518	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	General comment: Another suggestion is to use the words "Waste Management" instead of "Solid Waste" to be more general.	Changes have been made where appropriate.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

519	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	<p>Page 161, 2nd paragraph: Please remove this paragraph. Two re-written paragraphs are as follows: "Sycamore Landfill Inc. and Allied Waste of North America operate a landfill within the City of San Diego. They have submitted a request to the City of San Diego to expand the existing Sycamore Landfill. The submittal includes a small increase in footprint area, a significant increase in height, and a significant increase in the tons allowed through per day. The project is subject to a number of permit reviews. It is not possible to determine if additional life will be provided at this landfill as a result of the permit application, because it will depend on the combination of increased capacity and increased throughput that is ultimately approved. Allied Waste of North America also operates the Borrego Springs Landfill and has proposed a limited expansion. This is a relatively small facility." "The city is considering options regarding "vertical expansion" of Miramar Landfill, which would otherwise be expected to close by 2011."</p>	<p>Most of these comments are included in the RCP. The 'proposed' limited expansion of the Borrego Springs Landfill has not be included because the expansion has not been officially submitted in writing.</p>
520	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	<p>Page 162, 3rd paragraph: "Reuse" is "source reduction," and "transformation" comes above "landfilling" in the hierarchy, please fix this paragraph.</p>	<p>The waste management hierarchy described in the RCP is consistent with the official definition and listing with the California Integrated Waste Management Board and with the Integrated Waste Management Siting Element.</p>
521	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	<p>Page 164, 1st paragraph: Please delete the last sentence of this paragraph, it states: "This could be accomplished by banning certain types of compostable material from landfills, such as yard trimmings, paper, and food." Jurisdictions do not have authority to "ban" materials.</p>	<p>Text was revised to read: "This could be accomplished if jurisdictions had the ability to ban certain types..."</p>
522	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	<p>Page 162, 1st paragraph: It might be appropriate to mention the Campo Landfill in the "Proposed New Landfill" section.</p>	<p>The proposed Campo Landfill is on Reservation Land, which is under federal control, and like all Reservation land it is not subject to the RCP or local planning processes.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

523	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	Page 163, 4th paragraph: ESD supports comments provided by the TAC regarding this paragraph.	The RCP is a long-range planning document that is to be bold and ambitious. Stating that the region will exceed the state-mandated 50% rate and work toward a 75% diversion rate in the next 30 years is consistent with that concept. We have taken out 'by the year 2005' so that there is not a specific committal date.
524	3/4/04	letter	Chris Gonaver, City of San Diego, Environmental Services Department	Page 166: In the "Waste Management Policy Objectives and Actions," Policy Objective #2 states: "Exceed the state-mandated 50 percent waste stream diversion rate by the year 2005 and work toward a 75 percent diversion rate." ESD supports the TAC position on this language.	The RCP is a long-range planning document that is to be bold and ambitious. Stating that the region will exceed the state-mandated 50% rate and work toward a 75% diversion rate in the next 30 years is consistent with that concept. We have taken out 'by the year 2005' so that there is not a specific committal date.
525	3/4/04	letter	Solid Waste Technical Advisory Committee (TAC)	RCP, Chapter 4F, Policy Objective 2: The TAC has strongly and repeatedly opposed any language committing, or giving the appearance of committing, the region to a diversion rate higher than the current required statewide AB939 diversion rate of 50%. No jurisdictions in San Diego have committed to a higher rate of diversion, and most are struggling to meet the 50% requirement.	Please see response to comment #524.
526	3/4/04	letter	Solid Waste Technical Advisory Committee (TAC)	Please review and replace current language with the language noted in the County Integrated Waste Management Plan, Summary Plan, Chapter 2, Countywide Plan Objective (4a): The Cities and the County will optimize the current disposal capacity by continuing to implement and integrated waste management system, following each jurisdiction's SRRE and HHWE, meeting state diversion requirements as soon as possible.	Please see response to comment #524.
527	3/4/04	letter	Solid Waste Technical Advisory Committee (TAC)	Under the Program and Project Development and Implementation Actions: Take away 'redesign of product packaging'.	Wording has been revised.
528	3/4/04	letter	Solid Waste Technical Advisory Committee (TAC)	Under the Program and Project Development and Implementation Actions: Is incentivize a word?	Wording has been revised.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

529	3/4/04	letter	Solid Waste Technical Advisory Committee (TAC)	Under the Program and Project Development and Implementation Actions: Need to add 'construction and demolition programs' to number 2 or emphasize them somewhere.	Change has been made.
530	3/17/04	letter	Eric Larson, Farm Bureau of San Diego County	We would suggest that a modification be considered for Chapter 4D, item #3 under Planning. Making certain that agriculture remains viable in the county and continues to provide the environmental benefits mentioned in the RCP will require recognition that agriculture is an economic enterprise. Regional support for agriculture must reach beyond a discussion about soils.	The Healthy Environment Chapter recognizes agriculture's role in the ecosystem. It is beyond the scope of the RCP to address agriculture as an economic enterprise, but future amendments to the RCP could discuss the economics of agriculture and the need to protect agricultural soils.
531	3/17/04	letter	Patricia Aguilar, Crossroads	Our primary concern about the plan is over the "Smart Growth" concept. The concept of encouraging compact, high intensity development along selected transportation corridors NOW in the hope of attracting mass transit IN THE FUTURE does not strike us as particularly "smart".	The RCP emphasizes a comprehensive incentive-based approach to better coordinate transportation and land use planning. Through subregional planning and implementation programs and the application of an effective smart growth incentive program, SANDAG believes it can avoid high intensity development without appropriate transportation / transit services.
532	3/17/04	letter	Patricia Aguilar, Crossroads	Please keep Jim Peterson of our Steering Committee abreast of the progress of this planning effort.	Mr. Peterson has been added to appropriate SANDAG mail lists and e-mail distribution lists.
533	3/17/04	letter	Patricia Aguilar, Crossroads	The RCP should contain an assessment - or at least include a discussion - of the actual chances that rapid transit lines will be built - and what happens if they are not If not, SANDAG's RCP will be seen by future planners as a recipe for disaster instead of a plan for the future.	The RTP establishes the future transportation network that would be built with expected regional revenues over the next 26 years. The bus rapid transit lines are a priority in the RTP, and will be implemented as the HOV/managed lanes are constructed. Clarifying language has been added under the Transportation Funding section of the chapter.
534	3/29/04	E-mail	Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority	Add the following new paragraph on page 100 between paragraphs 3 and 4: "A sensitive indicator of the adverse impacts of urban runoff is local drinking water quality. The significance of urban runoff with respect to drinking water quality has only recently come to be recognized in the county. The deterioration of water quality can result in a reduced water supply and increased water treatment costs."	The text has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

535	3/29/04	E-mail	<p>Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority</p>	<p>Replace current paragraph on pg 101 with the following: "The hydrologic cycle consists of inflows, outflows, and storage of water. Inflows, such as rain, add water to the different parts of the hydrologic system, while outflows, such as streams or rivers, remove water. When the system retains water, groundwater in the earth for example, that's known as storage. Because water movement is cyclical, an inflow for one part of the system is an outflow for another. For example, when it rains (an inflow into the <i>local system</i>), the water hits the ground and travels downward toward the closest water body, such as a stream or river <i>to the ocean (an outflow from the local system)</i> . These <i>flows</i> can occur naturally or as a result of human activity. The natural water flow areas are defined as "watersheds." The San Diego region contains eight watersheds fully within its political boundaries, and an additional eight watersheds shared with our surrounding counties and Mexico (see Figure 4D.4)."</p>	<p>The actual proposed changes to the text are italicized and the text has been amended to reflect these changes.</p>
536	3/29/04	E-mail	<p>Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority</p>	<p>Add the following new paragraph on page 108 between full paragraphs 1 and 2: "On parallel but separate track, the California Health and Safety Code requires Department of Health Services (DHS) to develop and implement a program to protect sources of drinking water, specifying that the program must include both a source water assessment program and a wellhead protection program. The 1996 federal Safe Drinking Water Act amendments require each state to develop and implement a Source Water Assessment Program. A source water assessment is an evaluation of a public drinking water source to determine the human-caused activities to which the source is most vulnerable."</p>	<p>This discussion has been expanded to reflect Comments 537 and 544. The text under the "Drinking Water" section has been amended.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

537	3/29/04	E-mail	<p>Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority</p>	<p>Add the following paragraphs to the end of the existing plans and programs section on page 109: "The Safe Drinking Water Act (SDWA) requires that information be made available so the public can learn how to help protect its drinking water and make personal health decisions about it. When SDWA was amended in 1996, numerous provisions were added that give consumers greater access to information about, and opportunities for involvement in, drinking water issues.</p> <p>US Environmental Protection Agency (EPA) sets health-based standards to protect the nation's drinking water from unsafe amounts of contaminants. The standards are part of SDWA's "multiple barrier" approach to protecting drinking water as it travels from its source to your tap. EPA delegates responsibility for ensuring that the health standards are met to California's Department of Health Services (DHS).</p> <p>Consumer Confidence Reports, prepared annually by each community water system, provides information on the source of the water supply, the level of any regulated contaminants detected in the water, the health effects of contaminants detected above the safety limit, and the water system's compliance with other drinking water regulations."</p>	<p>This discussion has been expanded to reflect Comments 536 and 544. The text under the "Drinking Water" section has been amended.</p>
538	3/29/04	E-mail	<p>Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority</p>	<p>Amend this paragraph on page 111 to read: "Continued development within our watersheds, along our rivers and reservoirs, affects water quality and therefore affects local reservoirs and the quality of the water stored within them. Rainfall and melting snow flow to our rivers becomes trapped in the region's dams, and are then stored in twenty five local reservoirs, such as the Loveland, and Sweetwater, San Vicente, El Capitan, and Henshaw Reservoirs in the San Diego region. These reservoirs store billions of gallons of water each year and are used as a water supply for <i>almost 3 million</i> local residents."</p>	<p>The actual proposed changes to the text are italicized and the text has been amended to reflect these changes.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

539	3/29/04	E-mail	Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority	Add the following water quality objective: "Protect local drinking water sources."	This water quality objective has been added.
540	3/29/04	E-mail	Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority	Add the following water quality planning, design, and coordination action: "Integrate drinking water - source water protection guidelines into the development process."	An action has been added under "Planning, Design, and Coordination."
541	3/29/04	E-mail	Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority	Change water quality program and project development and implementation action number 3 to read as follows: "3. Educate the community about the impacts of our daily activities on the water quality of the ocean, <i>drinking water reservoirs</i> , groundwater, and other bodies of water."	The actual proposed changes to the text are italicized and the water quality program and project development and implementation action has been amended to reflect these changes.
542	3/29/04	E-mail	Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority	Add the following water quality funding action: "Secure funding for watershed management efforts throughout the county."	An action has been added under "Funding."

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

543	3/29/04	E-mail	<p>Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority</p>	<p>Replace current paragraph on pg 102 with the following: "Planners, environmentalists, and others increasingly recognize the links between land-use activities, such as building homes, roads, and offices, and their impacts on water quality. These activities can throw the hydrologic cycle out of balance and can affect the quantity and quality of natural water resources. <i>Water infiltration occurs when precipitation seeps through vegetated areas and into the ground, thus filtering</i> pollutants from the runoff. <i>Infiltration rates are affected by developments with impervious surfaces, e.g., those surfaces that are not easily penetrated by water, such as parking lots, roads, and sidewalks."</i> And add the following paragraph afterward. <i>"Urban planning must also be cognizant of where water flows. In the natural setting runoff water flows through vegetated land areas, which filter water before entering reservoirs. Interruption of this process can affect the quality and quantity of water entering the drinking water system."</i></p>	<p>The actual proposed changes to the text are italicized and the text has been amended to reflect these changes.</p>
544	3/29/04	E-mail	<p>Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority</p>	<p>Add the following paragraphs to the end of the existing plans and programs section on page 109: Source Water Assessments examine each of the region's drinking water sources (the rivers, lakes, groundwater, etc. from which water systems derive their water) to determine how susceptible they are to contamination. DHS makes the results of these assessments available to the public when they are completed. These assessments need to be updated in the future to maintain accuracy if land use or other changes occur in the watershed. Consumer confidence reports will include a summary of the Source Water Assessments once done, and may include more information on threats.</p> <p>Source Water Protection is everyone's responsibility. Protecting a community's drinking water source happens in many ways. Local government and water suppliers create inventories of potential pollution threats to the source of drinking water. The public can work with them to periodically update the assessment to include any land use changes that may occur over time."</p>	<p>This discussion has been expanded to reflect Comments 536 and 537. The text under the "Drinking Water" section has been amended.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

545	3/29/04	E-mail	Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority	Amend this paragraph on page 110 to read: "Polluted urban runoff can be a serious and major source of sediment contamination in our region's receiving waters, significantly affecting public health. The most likely path of exposure is through <i>drinking water and</i> the food chain, by eating fish and shellfish that has become contaminated through pollutants in the sediments."	The actual proposed changes to the text are italicized and the text has been amended to reflect these changes.
546	3/29/04	E-mail	Paul Gebert, SDCWA; Bob Collins, City of San Diego; Mark Umphres, Helix Water District; Troy Murphree, Sweetwater Authority	We would like to add a comment in Chapter 4F under the heading "Maintaining Water Quality." I think something like "Local surface water and imported water stored in local reservoirs is under direct influence of the watershed health, which is discussed in Chapter 4D.	The text has been amended to reflect this comment.
547	3/30/04	letter	Stephen Padilla, City of Chula Vista	The City of Chula Vista is also completing draft policies for various draft elements of its updated General Plan. We feel that this could be a model process for incorporating appropriate RCP policy objectives in local General Plan policies, as contemplated by the draft RCP.	SANDAG agrees, and will work with the City of Chula Vista to enhance the land use / transportation connection at the local and regional planning and implementation levels.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

548	3/30/04	letter	Stephen Padilla, City of Chula Vista	<p>The City of Chula Vista is excited by the prospect of meeting regional planning objectives by linking transportation and other public investment to areas where smart growth principles are applied. We look forward to cooperatively participating in programs such as the Smart Growth Incentive Program and "pilot" subregional transportation/land use plans and implementation programs. It is important that a firm commitment is made to prioritize regional resource allocations in those areas, such as the City of Chula Vista, that subscribe to and further the Regional Comprehensive Plan's objectives. This is critical in order for local jurisdictions such as Chula Vista to effectively support and further the tenets of the RCP. Providing resources for regional facilities and programs in a timely manner where growth is occurring and is expected to occur, consistent with regional and local plans, is essential.</p>	<p>Smart growth incentives are a key component of the RCP. The final RCP includes principles for the development of criteria for the smart growth incentives.</p>
549	3/30/04	letter	Stephen Padilla, City of Chula Vista	<p>Page 281, Prioritizing Actions through Strategic Initiatives. The draft RCP sets forth a broad and ambitious program of actions to implement the plan. We support the proposed approach of prioritizing actions through developing a list of "strategic initiatives" to help organize the actions over different periods and focus on those most in need of priority attention.</p>	<p>Thank you for your comment.</p>
550	3/30/04	letter	Stephen Padilla, City of Chula Vista	<p>Page 253, Figure 7.6, Distribution of Growth in the San Diego Region. If the existing Otay Landfill is depicted separately from the surrounding area on the maps showing population growth rates, it should not indicate a population increase, as residential use is not ever contemplated, even after its future closure.</p>	<p>The map shows population growth for an entire planning area as a whole. When developing our regional growth forecasts, SANDAG takes into consideration constraints such as incompatible uses, steep slopes, and flood plains and does not assign population growth to those sites.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

551	3/30/04	letter	Stephen Padilla, City of Chula Vista	<p>Page 59, paragraph 3 references the role of the RCP in the next update of MOBILITY 2030 (the Regional Transportation Plan) in 2006, and Chapter 9, Implementation Framework, alludes to future RCP updates. If not spelled out in the plan itself, developing a policy and process for updating the RCP should be referenced in the plan. Incorporating the routes in the next update of the Regional Transportation Plan will be important to forge compatible, mutually supportive land use and transportation plans. Likewise, the proposed TransNet extension list of projects does not currently include some of the South County projects that could be pivotal to supporting the smart growth concepts espoused in the Regional Comprehensive Plan and that are reflected in General Plan Update alternatives. What are the prospects for these projects, given the 30-year TransNet horizon?</p>	<p>As stated in the Introduction chapter, the RCP is expected to be updated within the next three to five years, in conjunction with regular updates to the RTP. With the next RTP update (scheduled to begin in FY 2005), SANDAG will be integrating RCP smart growth concepts. The final RCP includes the following recommended action in the Transportation chapter: "Update the Regional Transportation Plan, incorporating major RCP concepts," and the following Strategic Initiative in the Implementation chapter: "Incorporate the RCP's smart growth goals and policy objectives into the Regional Transportation Plan during the next RTP update." The currently adopted RTP, MOBILITY 2030, is a \$42 billion plan, which assumes a variety of revenue sources besides the TransNet Extension measure. The plan is based on a "Reasonably Expected Revenue" scenario that would fund other transportation projects in addition to those included in the TransNet Extension. As part of the next RTP update, SANDAG will update the current set of transportation project evaluation criteria that are used to help prioritize regional transportation investments. While the RCP recognizes that regional transportation investments should consider important transportation needs (e.g., congestion relief, safety, connectivity, etc.) in addition to smart growth, higher priority would be given to projects serving areas that are consistent with the RCP's smart growth concepts.</p>
552	3/30/04	letter	Stephen Padilla, City of Chula Vista	<p>Page 73, Funding Action #1. Does the reference to securing funding for transportation projects included in the 2030 Mobility Network include the network as currently identified and as it may be amended in the future?</p>	<p>Yes. This has been clarified in the text.</p>
553	3/30/04	letter	Stephen Padilla, City of Chula Vista	<p>Page 72, Transportation Policy Objectives 11 and 12 (top of page). Understanding how "equity" is defined and measured in this context is an important challenge faced in assessing the implications of these measures.</p>	<p>We agree with the importance of defining a process to equitably distribute transportation funding and projects.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

554	3/30/04	letter	Stephen Padilla, City of Chula Vista	Page 73, Funding Action #3. The proposed research into fees, exactions and other measures to mitigate development impacts on regional transportation facilities should recognize where impact fee programs are already in place within the region so that projects subject to such fees are treated fairly.	The latest TransNet proposal includes language to ensure that existing fee programs are recognized.
555	3/30/04	letter	Stephen Padilla, City of Chula Vista	Pages 90-91, Housing Goals, Policy Objectives, and Actions. We encourage that the actions in this chapter include continuing to work with the State of California to improve the Housing Element process, make the regional housing allocation process more logical, and focus on incentives that reward performance in meeting housing needs within the region.	An action to this effect was added.
556	3/30/04	letter	Stephen Padilla, City of Chula Vista	Page 48, Providing Incentives for Smart Growth. The incentives described for regional transportation network funding and through the Smart Growth Incentive Program are especially critical elements of the RCP.	SANDAG concurs.
557	4/8/04	letter	Douglas Williford, City of Santee	It is important to emphasize that the RCP does not supplant General Plans in the region, but rather, the RCP is intended to assist in the decision-making process as jurisdictions implement and update their General Plans.	SANDAG agrees. This point has been incorporated more explicitly into various areas of the final plan.
558	4/8/04	letter	Douglas Williford, City of Santee	This section is notably brief in its discussion of energy supply. The demand for energy outpaces projected population growth from 2003 through 2030, and there is a need for new transmission lines, transmission line upgrades, associated infrastructure improvements and substation modifications throughout the region if this demand is to be met.	The RCP includes a discussion of energy which is consistent in length and detail with the other discussion areas in the chapter. The energy discussion incorporates the Regional Energy Strategy and the Regional Energy Infrastructure Study by reference which includes a much more detailed discussion of the requested information.
559	4/8/04	letter	Douglas Williford, City of Santee	Instead of placing Exhibits 5 through 8 in the Technical Appendices relative to San Diego Gas & Electric's capital improvement programs and expenditures, they should be included in the Chapter and more fully explained.	These exhibits were included in the Integrated Regional Infrastructure Strategy Technical Appendices because they are more detailed than the discussion in the RCP.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

560	4/8/04	letter	Douglas Williford, City of Santee	The Chapter summarily references the Cabrillo (Encina) and South Bay Power Plants, and the San Onofre Nuclear Generating Station. An exhibit of their locations and any new ones under construction is recommended, together with a full discussion of the status of these plants in the chapter.	The RCP provides a generalized discussion of the energy issues in the region. Specific facilities are not discussed in detail due to the changing nature of power generation and transmission in the region. SANDAG's Energy Working Group and further updates of the San Diego Regional Energy Infrastructure Study will provide more detailed analysis of these and other facilities.
561	4/8/04	letter	Douglas Williford, City of Santee	The only Policy Objective is: "Meet the region's energy needs in a fiscally and environmentally sound manner." While supplying energy efficiently to reduce cost is laudable, the full extent of what that means should be explained since the transmission of electricity is a visible mark upon the landscape that crosses jurisdictional borders and has direct bearing on the choices jurisdictions make relative to land uses. An exhibit that depicts existing transmission easements and where easements are likely to be needed in the future should be included.	The level of detail that would be necessary to show all power easements in the region would not be possible in a regional-scale document. The information requested would be more appropriate for a local or site-specific application.
562	4/8/04	letter	Douglas Williford, City of Santee	In the policy objective, the term "environmentally sound" holds various meanings: minimization of landform alteration; minimization of visual effects upon the landscape; minimization of the potential exposure to electromagnetic radiation. This should be a more focused statement.	The statement generally refers to minimizing impacts to the physical environment including all the issues mentioned in the comment. These issues can be addressed more specifically on a case by case basis, however each future project will need to identify the issues that are specific to that situation.
563	4/8/04	letter	Douglas Williford, City of Santee	Action #2: Clarification of "development regulations and design standards" is essential. Consider adding "and minimize potential health risks" to the Action. In that vein, the undergrounding of facilities (transmission and distribution lines) should be included as an appropriate policy.	A modification to Action #2 has been made to reference minimizing potential health risks. SANDAG did not reference undergrounding of facilities since the new language is more general and can include other issues such as air quality impacts.
564	4/8/04	letter	Douglas Williford, City of Santee	The Sycamore Canyon Landfill operator has applied to the City of San Diego for a permit to expand, "subject to certification of an Environmental Impact Report". The discussion on the expansion of the landfill should be deleted since it is only a "tentatively reserved site" in the County's Integrated Waste Management Siting Element.	The Sycamore Canyon Landfill expansion is no longer included in the CIWMP under a 'tentatively reserved site' (see Ch. 7 of Siting Element). The discussion of the expansion is still included in the Siting Element in Ch. 4, entitled "existing disposal facilities and expansions" and will therefore remain in the RCP. Wording has been revised to reflect the above change.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

565	4/8/04	letter	Douglas Williford, City of Santee	Existing viable and successful housing developments (affordable and market-rate) that embody "Action #1" would be helpful to include in the RCP.	A discussion of the successes of the nonprofit housing development community was added.
566	4/8/04	letter	Douglas Williford, City of Santee	The discussion of California Redevelopment Law should be expanded, given its importance in generating funds for affordable housing projects.	This section has been expanded.
567	4/11/04	E-mail	Jose Lopez, Fox Canyon Neighborhood Association, Inc.	I would like to make the following recommendation into the RCP: A monorail line from San Diego State University, via University Avenue, unifying Trolley lines and all the neighborhoods of City College/Rolando, City Heights, North Park, Hillcrest, Little Italy, with Sea World.	While a monorail is not proposed, connectivity of the regional transit network in these locations will be considered for the next update of the RTP.
568	4/11/04	E-mail	Jose Lopez, Fox Canyon Neighborhood Association, Inc.	I would like to make the following recommendation into the RCP: A subway system - as land is becoming expensive and more difficult to acquire, the way to go is underground. Now, it will be cheaper to build and to secure right-of-ways.	The current RTP includes two tunnels along the coastal rail corridor as well as some rail grade separations. An extensive subway system is not proposed.
569	4/11/04	E-mail	Jose Lopez, Fox Canyon Neighborhood Association, Inc.	I would like to make the following recommendation into the RCP: Bus Routes - North/South, unifying Trolley Stations in Mission Valley (Fairmount Avenue) with the Euclid Avenue Stations, via Euclid/Home Avenue and Federal Blvd.	Connectivity of the regional transit network in these locations will be considered for the next update of the RTP.
570	4/11/04	E-mail	Jose Lopez, Fox Canyon Neighborhood Association, Inc.	I would like to make the following recommendation into the RCP: The Historical Trolley cars from the convention Center to El Cajon Blvd., via Park Blvd., unifying the proposed Central Library, Petco Park, City College, the Naval Hospital, the SD Zoo, the DMV and Hillcrest.	Connectivity of the regional transit network in these locations will be considered for the next update of the RTP.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

571	4/13/04	letter	Raul Flores, Chamber International Committee	State Senator Denise Moreno Ducheny's district extends to the entire Imperial Valley and parts of the Coachella Valley. With this in mind, more mention of Calexico, Mexicali, El Centro and other valley cities and communities would make a more inclusive regional comprehensive plan (especially with the reopening of the Carrizo Gorge Railway) and the impact that will have on our eastern border neighbors.	This chapter describes the most relevant issues that impact our borders. In the case of Imperial, the Borders Committee approved designating work with Imperial County as a priority for FY 05 (Strengthen collaboration with Imperial County). Imperial County is a member of the Borders Committee. Additionally, language was added to the Borders Chapter and the Housing Chapter discussing the growing trend of San Diego County workers buying more affordable homes in Imperial County.
572	4/13/04	letter	Raul Flores, Chamber International Committee	Some items seem to be repeated like the numerous 'Binational Perspectives' throughout the chapter. May I suggest summarizing the parts that repeat? Since the chapter's focus is on binational perspectives, just a couple reminders should suffice for easier readability. One perspective near the beginning and one to summarize and close the chapter.	This chapter focuses on issues with all of our surrounding borders. SANDAG's Borders Committee directed staff to address the six borders-related planning issues from three perspectives -- the binational perspective, the tribal perspective, and the interregional perspective. We acknowledge that this approach leads to some repetition, but it also ensures comprehensiveness within the chapter.
573	4/13/04	letter	Raul Flores, Chamber International Committee	A timeline for the Interregional Partnership (IRP) Strategies would be good to include along with the development ideas.	The information provided in the plan does not include the level of specificity suggested in this comment.
574	4/13/04	letter	Raul Flores, Chamber International Committee	Can we include Department of Homeland Security (DHS) updates, if any? Perhaps an update from the Border Trade Alliance on the U.S. VISIT.	This is included in the work program of SANDAG's Committee on Binational Regional Opportunities (COBRO).
575	4/13/04	letter	Raul Flores, Chamber International Committee	The chapter reads well. The chapter touches on relevant topics to the border region, and has room to include more like perhaps lessening urban sprawl.	A key goal of the RCP is to reduce land consumption. Several RCP chapters, including the Borders chapter through its discussion on Jobs/housing access, address this issue. Other chapters that emphasize this subject include the Urban Form, Transportation, and Housing chapters.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

576	4/17/04	Wkshop CR	Kathleen	<p>My concern is that open space will be gone by the time the plan is implemented. There isn't going to be any open space left to protect; all it's going to accomplish is create more congestion in this area which is right next to the freeways and the transportation corridor for North County Transit District. And I don't think that's reasonable. I think that we have a right to have some open space within our living area as well and I really very much am against increasing the density in Encinitas, Leucadia, and Carlsbad.</p>	<p>The region is in the process of completing the Multiple Habitat/Species Conservation Programs which will identify permanent open space for the protection of native plants and animals. These areas are located throughout the region, (including every city) and are connected in a north/south and east/west direction.</p>
577	4/17/04	Wkshop CR	Liz, League of Women Voters	<p>I'm completely for smart growth and what SANDAG is trying to do, because it's the same thing as to what the league is trying to accomplish as well. But I think a lot of people need persuading that this is how the future looks, that is instead of having everybody in their own separate cars, we need to get them into public transportation. We should have more shuttle buses that are full so people will get the idea that we're not wasting money on large vehicles and we're trying to be more accommodating and flexible. And I think flexibility is probably a key to a lot of these problems that we have in this area.</p>	<p>SANDAG concurs.</p>
578	4/17/04	Wkshop CR	Liz, League of Women Voters	<p>I also feel that somehow or other we need to persuade the cities and the City Councils of our various cities to embrace density not as a bad thing, but really as a very good thing, because I don't see how you're going to get the needed infrastructure for public transit, and a proper road system to accommodate people going back and forth to work. Unless we have attractive housing scattered in the downtown areas, so as to accommodate, the people are going to be riding the transit systems. So I think we have probably more than anything else a huge failure at getting our message across. And I think that is as far as I can see, is one of our biggest problems. There are still too many people that look at the system and don't have confidence in it. But I think that SANDAG has a great staff and they're doing a great job.</p>	<p>No text change required.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

579	4/17/04	Wkshop	Rachelle Collier	My main concern is infill. I am not against infill development. But if a lot is zoned R-8 and/or R-11 how does it help our problems to allow them to build 3 mcmansions! We need affordable homes not more unaffordable housing.	This type of infill could be prevented by the implementation of minimum density requirements. A discussion of minimum density requirements has been added to the Housing chapter, as well as a corresponding action promoting them.
580	4/19/04	Wkshop CR	George Purcell	South Santa Fe here in Vista from Mar Vista Drive to Rancho Santa Fe Road will be widened. The whole road is four lanes, two lanes on each side at least, in all the areas except from Mar Vista to Rancho Santa Fe. So they're going to widen it within the next -- it's in the plan for the next couple of years, whenever, I don't remember the date. But North County District is putting in bus stops in this length of road which they've never had since the history of the bus line, but now they're putting in these bus stops which cost according to the newspaper 30-plus thousand dollars. So I would have hoped that somebody would have foreseen the widening of this road, so these bus stops wouldn't have to be changed any when they do widen that road, but they are not. They are at the edge of the road, edge of the existing roads. So what's going to happen to those bus stops when the road is widened?	We have referred your concern to the transit operator in the area, the North San Diego County Transit Development Board (NCTD).
581	4/19/04	Wkshop CR	George Purcell	The Sprinter train that's going to be built by North County Transit District between Escondido and Oceanside is supposedly going to cost a 350-something million dollars, but already they're ordering cars, and the price of everything is going up, and the next thing we know, it's going to be a billion dollars for a train that who's going to ride? Only people that can afford to drive their car as long as there's gas on the road, gas at the gas stations, people are going to be in their cars. They're not going to be in the train if they can afford it and if we can afford it, except very low income families. I think the money would be much better spent on our road system, because that is the popular mode for travel. You ain't going to catch me on a bus as long I can afford not to.	No text change required.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

582	4/19/04	Wkshp CR	George Purcell	Also, what I think about 5 and 78, we have a freeway system in California which we have very good roads, but you can't call 78 and 5 a freeway system when you have to go through a traffic light to make a 90-degree turn to go to San Diego from 78. So I saw the list of things that are TransNet tax money that they're trying to get it for another 40 years. And in the list of things, I never saw on that list improvement to the intersection of 5 and 78 and that should be our main priorities, because there are two main freeways in our system. A complete clover should have been done when they put 5 and 78 in, but the people didn't foresee that, and it seems to me it could be a clover if they just require a little bit more of a land. There's a parking lot on the north-west corner of that intersection and a business at the south-west corner; otherwise, it's pretty well opened up intersection, and if nothing else, put up a bridge over 5 or 78 as they have done at the 15 and 78. It could be a very achieved safety improvement.	While not listed as a specific project in the TransNet measure, the interchange between Interstate 5 and State Route 78 is planned for reconstruction to eliminate the signals for the ramps.
583	4/19/04	Wkshp CR	George Purcell	I see every morning cars backed up on 78 for quarter to half a mile, and they're sitting on the side of the road waiting for the Sycamore light to change. So if they could let two lanes turn right as well as turn left, it would expedite the traffic, the traffic through. With a simple sign change, it would help the problem, a simple sign change.	Your comment regarding freeway ramp operations has been passed on to Caltrans for a response.
584	4/19/04	Wkshp CR	George Purcell	Rancho Santa Fe Road, we got the same problem there, only in reverse. The right two lanes can turn right, but the left lane can only turn left, and they should change that sign, so two cars -- two lanes could turn left, two lanes could turn right.	Your comment regarding freeway ramp operations has been passed on to Caltrans for a response.
585	4/19/04	Wkshp CR	George Purcell	Now, we go back on the freeway again. We go down to the next off-ramp which is San Marcos Boulevard. We're back to Sycamore now, two lanes can turn right, one lane -- no, two lanes can turn left at Sycamore and only one lane can turn right. And a simple sign change would help directly help the situation. These are the only three that I know about. How many more like this?	Your comment regarding freeway ramp operations has been passed on to Caltrans for a response.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

586	4/19/04	Wkshop CR	John Davis	<p>I live in rural unincorporated area of Vista, Lone Oak Lane. I lived there for eighteen years, been out in that area for the last 48 years. I seen a lot of changes, some not impacting or too much proposed development is really something that has me concerned, because we have a flood plain that gets -- when there's massive amounts of rain, gets close to the houses and up the grade. If they do put in the proposed houses, it would endanger us down below. I am concerned with the proposal of taking away our easement road for the public, the 47 homes, when the developer isn't even from the area would make a profit without doing anything for the infrastructure and simply would then leave and leave us to suffer the consequences.</p>	<p>County of San Diego regulations govern the infrastructure requirements for new development in the unincorporated area. SANDAG does not have land use authority and is not a regulatory agency. SANDAG and the local jurisdictions work together to develop regional land use and transportation policies. No text changes were made to the RCP.</p>
587	4/19/04	Wkshop CR	John Davis	<p>Another concern I have is the Sprinter with approximately 37 crossings. How is that going to alleviate and solve some of the traffic problems, when there are days when it takes 20 minutes just to get out of the Buena Creek area and down to the freeway? Which is only about a mile and-a-half. If the Sprinter goes through there, we would have a back up for three minutes when the crossing guard is down, and then traffic would back up even more, probably take half-an-hour just to get to the mile-and-a-half to the freeway. So those are the concerns I have. I hope we can find some way to work together. I know that development does need to take place, but it should be well planned and for the good of everybody involved. Thank you.</p>	<p>The North San Diego County Transit Development Board (NCTD) is working with local jurisdictions to minimize the impact of the Sprinter to local traffic operations.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

588	4/19/04	Wkshp CR	Lindsay Townley	<p>I am representing my community Lone Oak Lane, Vista. And we are fighting a proposed development of very expensive homes that will be behind a wall that surrounds the entire development, and it's going to abut right up to our homes. And without any consideration for appeasing transition between the two communities, for example, wide trails, riding trails, hiking trails, we're literally going to be looking at a wall with houses behind it. So that is what brought us here to the meeting tonight. And so we're concerned about fire safety as many people are in the county. We are two communities with only one exit. In case of a fire, the developer wants to use the lane, our one and only private road that cuts through our community, and so by adding three communities using one exit in the event of fire, so this is a very, very serious consideration for us.</p>	<p>County of San Diego regulations govern the infrastructure requirements for new development in the unincorporated area. SANDAG does not have land use authority and is not a regulatory agency. SANDAG and the local jurisdictions work together to develop regional land use and transportation policies. No text changes were made to the RCP.</p>
589	4/19/04	Wkshp CR	Lindsay Townley	<p>We're also concerned about developers taking over our wilderness areas and building homes of 800,000, 900,000, million-dollar homes. These are not affordable housing projects, and so we view it as an unnecessary building development, and development which will substantially alter the lifestyle of the people in our community. So we're wanting for there to be some more controls over that. We're for affordable housing. We're for building affordable houses in the townships, keeping people in the town, so that we don't keep getting this urban sprawl.</p>	<p>The RCP promotes smart growth development in appropriate areas throughout the region, including appropriate unincorporated rural communities. Smart growth includes concepts such as housing affordability, walkability, a mixture of land uses, and transportation options in village cores within the Village Limit Lines.</p>
590	4/19/04	Wkshp CR	Margaret Ramsing	<p>I am interested in the reading background documents. And I have been to the City Clerk's Office to ask about that and I have been to our county library to ask about that, and the background documents are not available locally that I could see. I went to the website and the first document I was interested in looking at had 153 pages, and it wasn't very well indexed for reading on the website. So I would like to know where all of these materials are available so that somebody like me can come down and sit and look at them.</p>	<p>All documents related to the RCP planning process are available. Please contact (619) 699-1900 for more information or to schedule an appointment with SANDAG staff to review any documents of interest.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

591	4/19/04	Wkshop CR	Marina Ilona	I also want to add an item that I'd like to express concern about -- with the County is information that we were given verbally at the Vista Fire Committee last Wednesday evening. Lance Vollmer, he's the district's president of the fire district, stated that eminent domain proceeding from roads such as ours could actually be started if the County didn't have money that a developer or anybody else could give money to the County and then the road could be taken. We need to know if that is the truth.	This is beyond the scope of the RCP.
592	4/19/04	Wkshop CR	Marina Ilona	We are having problems with cities and the county initiatives where the City seems to circumvent the county. I guess recommendations, overbuilding of fire clearances and so forth. And developers are able to back door through ways, we're not sure how, but they're coming into rural areas and beginning to build what they consider "affordable housing" in dispute which are huge homes, in areas that are not comfortable.	This comment is beyond the scope of the RCP. Regulating the width of fire breaks and permitting new housing are authorities that rest with local governments - the cities and the County of San Diego.
593	4/19/04	Wkshop CR	Marina Ilona	Basically, the reason I'm here is to represent wildlife being involved in Project Wildlife as well as Farmer Life Rescue. I am concerned about what's left of the county's environment and how building or overbuilding or improper building not only damages the environment, but also changes water, changes air and it changes the quality of life, and for everybody. Even with the new people that would move into an area, they may not realize what it used to be and so they miss out on what was.	The region is in the process of completing the Multiple Habitat/Species Conservation Programs which will identify permanent open space for the protection of native plants and animals. The two key components of the preserve design include the protection of large blocks of high quality habitat areas and the protection of wildlife corridors which connect these core areas.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

594	4/19/04	Wkshop CR	Marina Ilona	<p>We are in a very sensitive fire zone area. I was here during the fires in 1978/79. The Buena Creek and Monte Vista areas, with the sprinter coming in, would not be able to handle the three developments that are coming in through the Buena Creek corridor. In fact, we have residents that come all the way from Ontario, Temecula, Murrieta and are using Buena Creek after taking Deer Springs Road and Twin Oaks Valley Road as a way to get to I-5. So the amount of impact, even without a fire safety issue, would be almost incompatible, because as we all know in the county, we're getting the sprinter light rail which is going to circumvent the ability for people to travel across. And from the studies that have been done, it appears that some of this traffic will probably tie up for about five miles. There will be no way for fire safety to come into our areas to fight any fire. But as people in these kinds of extreme events, stability is lost and people start doing things that are very difficult to deal with.</p>	<p>This is beyond the scope of the RCP. Permitting or not permitting new development in the Buena Creek and Monte Vista areas is the decision of the County of San Diego. Access to the proposed development, including fire safety equipment access, will be addressed by the County prior to permit issuance.</p>
595	4/19/04	Wkshop CR	Marina Ilona	<p>The only things that I wanted to find out from the County, and I did not meet anybody that gave me an answer that I feel is very serious. When I first moved here back in 1973, everywhere we had what was called fire breaks, very large areas of tilled land that would break up pieces of parcel in such a manner that in case there were fires, that the fire could actually automatically stop by this fire break. I have seen them actually disappear through developments being built and somehow being erased. I'd like to know why.</p>	<p>The original scope of the RCP did not include fire as a topic area, but the Implementation Chapter indicates that a Public Facility Chapter can be considered in future updates to the RCP. SANDAG recently appointed a Public Facilities Committee to advise the SANDAG Board of Directors on policy level matters related to public safety. Also, a policy objective was added to the Healthy Environment chapter addressing the need to promote fire management techniques to reduce hazards to humans and their property.</p>
596	4/19/04	Wkshop CR	Olivia Quinn	<p>I think the Sprinter is a huge waste of money. I don't believe it has the ridership to support it. I don't believe we have the connections. I think that the Sprinter is going to go the way of the ferry. And that's it for that. And then I have a last comment. I think that we need to build the roads, expand the roads to support our existing housing and businesses. The roads now are overcrowded and the area keeps growing. We do not have the infrastructure needed to support our current housing and businesses. What's going to happen one year, two years, three years from now? Thank you.</p>	<p>The region and the local jurisdictions are working hard to secure the funding to complete the planned circulation network to serve both existing and future development.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

597	4/19/04	Wkshop mailed	Rachelle Collier	<p>I live in Leucadia west of I-5. I am not against infill. However, what is happening here is not what infill was intended to be. When a developer buys a 1 acre lot zoned R-8 or R-11 and builds 3 huge houses. If we are going to allow infill then we should be adhering to zoning. I would rather see 4 or 5 small houses on the same lot than 3 McMansions that dwarf everything around them. The developers should be working with the community not to make more profit, but to help the problems that exist. The biggest being affordable housing. They are obviously building larger homes to maximize their profits not because smaller, slightly cheaper homes would not sell (we all know they'd sell in a minute) and it would be true infill. Everyone wants to blame neighborhoods for trying to stop development. We do not want to stop it - we just want it to be appropriate and follow the guidelines of the general plans of each community.</p>	<p>This type of infill could be prevented by the implementation of minimum density requirements. A discussion of minimum density requirements has been added to the Housing chapter, as well as a corresponding action promoting them.</p>
598	4/19/04	Wkshop CR	Zahra Imani	<p>I filled out the paper. All of the neighborhood, they signed. We went to all their workshops. One of the problems at the workshop, they didn't tell us that they're going to crack that land, rocked by dynamite. At first, they told us they're going to do it by machine, crack the rocks. And then they called me and they said that this was a misunderstanding and miscommunications and this is going to happen with dynamite. And even though I got signatures from our neighborhood, everybody disagrees, but it seems they don't care. And I don't know.</p>	<p>This is beyond the scope of the RCP.</p>
599	4/19/04	Wkshop CR	Zora Szemenyei	<p>I have been involved in transportation issues in this county for many years, and the best idea that I heard so far was the concept where developers pay for their use of transportation and their needs for transportation so that San Diego regional citizens are not stuck with developing roads for developers.</p>	<p>Many jurisdictions require developers to pay impact infrastructure fees in order to construct their projects. The region is now proposing additional developer impact fees as part of the proposed TransNet sales tax extension.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

600	4/20/04	Wkshop	Craig Heiller	Please consider a trash-to-energy plant in the East San Ysidro - Otay Area. This recycling/Trash to Energy plant would serve both sides of the border, employ from both sides of the border, supply energy, reduce landfill use and build partnership between the U.S. and Mexico. That area just east of the port of entry and between the Tijuana and Otay airports is open, industrial, and well located for this purpose.	SANDAG's Energy Working Group is currently evaluating the issues that should be updated in the San Diego Regional Energy Infrastructure Study. Issues such as the trash-to-energy plant discussed in the comment would be more appropriately discussed at the working group level before being identified in the Regional Comprehensive Plan.
601	4/20/04	Wkshop	John Davis	What can be done to alleviate the traffic backups that will be multiplied by the Sprinter crossings?	The North San Diego County Transit Development Board (NCTD) is working with local jurisdictions to minimize the impact of the Sprinter to local traffic operations.
602	4/20/04	Wkshop	John Davis	Why wasn't Rancho Santa Fe Road extended eastbound/northbound towards Buena Creek Road with possible juncture at Blue Bird Canyon Road?	The North San Diego County Transit Development Board (NCTD) is working with local jurisdictions to minimize the impact of the Sprinter to local traffic operations.
603	4/20/04	Wkshop	John Davis	Lone Oak Lane is being threatened with legal confiscation of our easement to provide access to the area behind our neighborhood. What can we do to keep our neighborhood our own? (47 proposed homes minimum).	County of San Diego regulations govern the infrastructure requirements for new development in the unincorporated area. SANDAG does not have land use authority and is not a regulatory agency.
604	4/20/04	Wkshop	John Davis	Talk is of "affordable housing." This would bring more to the areas and boost the building industry - Why not planned infrastructure before building continues and have developers put it in place before/instead of causing more problems?	The RCP is based upon the premise that we must do a better job of planning for infrastructure to support future development than we have in the past. The Integrated Regional Infrastructure Strategy chapter outlines a forward-looking investment and financing strategy that will help the San Diego region meet its infrastructure needs.
605	4/21/04	Wkshop	Anonymous	One of the most important features of a successful region is having balanced communities. Although the Plan speaks of it, SANDAG needs to lead the way with incentives that will help overcome the current negativity to balanced communities.	SANDAG has expanded its discussion of incentives for smart growth in the Urban Form, Housing, and Implementation chapters. The principles for developing criteria for smart growth incentives emphasize priority for areas that provide a greater array of housing choices and housing affordability.
606	4/21/04	Wkshop	Anonymous	SANDAG can help the cities with financial carrots to convince its citizens to some parts of this plan they would not otherwise accept.	The RCP is very much an "incentive-based" plan. The Urban Form, Housing, and Implementation chapters provide additional detail on incentives for smart growth.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

607	4/21/04	Wkshop	Anonymous	I was impressed with the thoroughness and depth of the plan and feel SANDAG has done a great job so far.	Thank you for your comment. No text change was made to the RCP.
608	4/21/04	Wkshop	Anonymous	Social Equity is important. It is too easy to burden the all ready over burdened areas with those parts of society that are not nice, such as homeless shelters, drug rehab places, and basic low-income housing. These areas need to be given more help financially to help them deal with these issues before they can become a problem.	This is a key reason that the RCP emphasizes the importance of improvements to existing, older communities.
609	4/21/04	Wkshop	Anonymous	The Plan discussed Universal Design, but feels that costs are prohibitive. The baby boom means that a large part of the population is getting close to "old age" when they will need homes that they can stay in - if and when they become disabled - or simply unable to climb stairs and turn door knobs.	The RCP does not state that Universal Design is cost prohibitive, but rather that some believe such requirements add unreasonable costs to new housing. In reality, Universal Design features can be added to a new home at little or no added cost. A discussion regarding this has been added to the Housing chapter.
610	4/21/04	Wkshop	Anonymous 2	I think that Housing and Transportation are two of the most important problems to tackle for SANDAG and all the other agencies in the San Diego region. I hope housing will become more affordable and built "smarter" - that is some "upward" growth instead of "outward" growth.	A major thrust of the RCP is to promote smart growth in appropriate locations, which entails a greater mixture of land uses, higher intensities in key locations, greater transportation choices, more housing affordability, and other concepts.
611	4/21/04	Wkshop	Anonymous 3	The RCP should stress the economic impact of the options for growth. The decisions will be driven by these economic factors.	The RCP addresses this issue in several chapters, including Housing, Economic Prosperity, Transportation, Borders, IRIS, and others.
612	4/21/04	Wkshop	Anonymous 3	There are inter-relationships between SANDAG and SCAG for growth and transportation issues. These need to be explored for the benefit of San Diego.	Staff coordinates interjurisdictional issues with SCAG. The Board members from SANDAG and SCAG have biannual joint meetings to discuss shared issues.
613	4/21/04	Wkshop	Anonymous 3	A goods movement section at SANDAG would stress the importance of freight for transportation and growth.	Recent RTPs have included more emphasis on goods movement issues and the impacts on the transportation system and our economy.
614	4/21/04	Wkshop	Anonymous 3	Merging the interests of SANDAG transportation issues and local municipal planning for land use is essential.	This is a major thrust of the RCP: connecting local decisions with regional transportation planning and implementation.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

615	4/21/04	Wkshop	Don Wood	Obtain written commitments from San Diego County and regional cities to update their current general plans and zoning ordinances to make them consistent with the RCP. Develop stringent enforcement procedures to penalize any SANDAG member agency that fails to do so within one year of SANDAG adoption of the RCP and/or passage of the proposed <i>TransNet</i> extension initiative.	The RCP is an incentive-based and collaborative plan. The final RCP includes principles for developing criteria for smart growth incentives and guidelines for strengthening the connection between local and regional plans. Comments related to the specifics of the <i>TransNet</i> Extension ordinance will be addressed through the <i>TransNet Extension</i> effort.
616	4/21/04	Wkshop	Don Wood	SANDAG should adopt a RCP, based upon "smart growth" planning principles, including: Improve and expand public transit linkages between regional jobs and housing centers. Make new transit efforts as flexible and user-friendly as possible.	The Smart Growth Principles are in sync with this comment, and the RCP incorporates the Transit First philosophy of better connectivity between major activity/employment centers and the rest of the urbanized area.
617	4/21/04	Wkshop	Don Wood	SANDAG should adopt a RCP, based upon "smart growth" planning principles, including: Increase efforts to encourage residents and workers to take public transit to and from their homes and their jobs, forgoing use of single occupant automobile commutes.	We agree. The Smart Growth Principles include offering travel choices, and the major emphasis in the RTP and hence, the RCP, is to encourage other modes of travel besides solo driving.
618	4/21/04	Wkshop	Don Wood	Link all future SANDAG RTP updates and amendments to the RCP, and ensure that the RTP supports the principles and goals of the RCP. Eliminate all elements of the current (2030) RTP that undercut or ignore the principles and goals of the RCP.	Updates of the RTP and RCP will be iterative, and the next RTP will reflect the principles of the RCP.
619	4/21/04	Wkshop	Don Wood	If it really wants to pursue smart growth, SANDAG must modify its current thinking when it comes to new roads, freeways and transportation project planning. An old building industry saying is that "houses follow the roads". If SANDAG wants to preserve rural areas and open space, it must stop building new roads and freeways that support and subsidize sprawl development with local tax funds.	The focus of new regional transportation facilities is in the existing and planned urbanized areas.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

620	4/21/04	Wkshop	Don Wood	If SANDAG is really committed to smart growth, it must immediately modify the proposed TransNet extension ordinance and its 2030 RTP deleting funding for the SR 94/SR 125 South interchanges and other dumb growth transportation projects that only perpetuate the sprawl development status quo.	Existing congestion problems caused by existing development are the focus of the SR 94/SR 125 missing freeway connectors.
621	4/21/04	Wkshop	Don Wood	SANDAG should adopt a RCP, based upon "smart growth" planning principles, including: Finance future transportation projects to channel new growth into established regional cities and urban core areas, along with infrastructure improvements needed to meet or exceed current community standards.	We agree that as much future growth as possible should be channeled into established areas where facilities can accommodate it. The Smart Growth Principle of Infrastructure Capacity and Location embodies the concept of giving priority for transportation projects that would encourage smart growth development as infill and along established transportation corridors.
622	4/21/04	Wkshop	Don Wood	SANDAG should adopt a RCP, based upon "smart growth" planning principles, including: Limit regional economic development investments to efforts that measurably improve the region's jobs and housing balance.	The RCP advocates the creation of high quality jobs. By creating high quality jobs, more residents will be able to afford housing in the region, and the jobs housing balance will be improved.
623	4/21/04	Wkshop	Don Wood	SANDAG should adopt a RCP, based upon "smart growth" planning principles, including: Cancel all SANDAG investment in highway and roadway projects in the current 2030 Regional Transportation Plan (RTP) that would subsidize sprawl development, including but not limited to the SR 125 South "Gap-Connector" Project, and the widening of State Routes 67, 76 and 78. Include clear language in the TransNet ordinance and the RCP prohibiting funding for any proposed future new highways or roadways which would increase access to outlying rural and agricultural lands in a way which would subsidize sprawl development - or cause further loss of regional agricultural lands and open space.	The RCP is based on smart growth and sustainability principles. The RCP does not recommend deleting any roadways included in MOBILITY 2030, the adopted Regional Transportation Plan (RTP). With the next RTP update, SANDAG will be integrating RCP smart growth concepts. For example, SANDAG will update the current set of transportation project evaluation criteria that are used to help prioritize regional transportation investments. The RCP recognizes that regional transportation investments should consider important transportation needs (e.g., congestion relief, safety, connectivity, etc.) in addition to smart growth. The final RCP includes both the following recommended action in the Transportation chapter: "Update the Regional Transportation Plan, incorporating major RCP concepts," and the following Strategic Initiative in the Implementation chapter: "Incorporate the RCP's smart growth goals and policy objectives into the Regional Transportation Plan during the next RTP update."

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

624	4/21/04	Wkshop CR	Irene	My comment would be helpful to know what the timeframe is for some of these changes, and what more of a direct impact to a resident would be. The concept seems very interesting, but I'm not sure how to translate that into what it means to me and my daily life or my daily commute. And I like the idea of an infill for the urban form, but I am concerned about overcrowding. And what overcrowding does to schools, where our kids are just crammed together in a very dense space, so it never seems to have more of a relaxed feel, but also feel more like an urban jungle than in the urban infill.	The RCP is a long-term strategic plan with a horizon year of 2030. However, implementation will begin upon adoption by the SANDAG Board. Changes have been made in various areas to relate the significance of the plan to daily life.
625	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	Pg. 99 - Add an Action, under Planning, Design, and Coordination, "Encourage development to inherently protect it from wildlands fires so that clearing, fragmentation, and degradation of natural habitats can be avoided.	The final RCP includes an action addressing the need to consider wildfires when designing future development projects.
626	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	The beach replenishment effort should be treated as a band aid program until the beach problem is solved. The RCP should show a transition between the two.	It is recognized that beach restoration efforts are a reaction to modification that has occurred to the natural drainage and sedimentation process. SANDAG's shoreline preservation strategy identifies this problem and identifies beach nourishment as the most practicable means to address near-term erosion and sand loss issues.
627	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	It seems like the RCP should somehow address sand and gravel extraction since it has large impacts and our current policies are very damaging to water quality. How will the growth that is facilitated require more extraction? What will be the regional environmental impacts of that?	The RCP does not assume that all sources of materials that will be needed for regional growth will cause the same impacts as did the materials that were used for existing development. Stringent development regulations, including permits for sand and gravel extraction, address those issues on a site-specific level. In addition, water quality regulations have become more stringent than in the past which could result in improvements in water quality from these types of operations.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

628	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	Pg. 112 - Over 90% of wetlands are gone. Healthy waterways are needed to restore water quality as well. Please consider changing Objective 3 to: "Protect, restore, and maintain our region's wetlands, rivers, and streams." Under actions please add something like "discourage development that includes fill of floodplains and wetlands and waterways." And, "Encourage projects that remove fill from wetlands and waterways."	Policy Objective 1 has been amended to reflect this comment. While the RCP does not encourage the removal of existing development, wetland restoration can be required or encouraged when there are opportunities for such enhancement.
629	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	Please add a section on restoring natural sediment transport by rivers. This would include pumping sediments downstream of reservoirs, planned releases of water pulses, and relocation of some developments from floodplains so the first two can happen.	The information provided in the plan does not include the level of specificity suggested in this comment. However, the Healthy Environment chapter does support and advocate a healthy wetland habitat.
630	4/21/04	Wkshop	Jim Peugh, San Diego Audubon Society	P. 71 - First goal should be to provide services, parks, goods, jobs, etc. within walking distance of homes and of each other so most trips will be done by foot or bike. There should be objectives, actions, etc. to implement that goal.	These land use goals are referenced in the Urban Form chapter of the RCP.
631	4/21/04	Meeting Minutes	Patti Krebs, Industrial Environmental Association (IEA)	With San Diego County's shrinking inventory of available land, IEA recognizes the pressures to use areas zoned for industrial occupancies in different ways -- residential, churches, schools, public facilities, etc. However, it is IEA's position that the region must not lose sight of how important manufacturing and industrial facilities are for the creation and preservation of good, high-paying jobs for a wide variety of skill-levels and occupations.	Comment noted. The Urban Form chapter of the final RCP includes the following recommended action: "Implement development projects and plans that: Avoid and mitigate incompatible land uses, for example, by establishing buffers or transition zones between housing and industrial uses or major transportation corridors that could pose health risks."
632	4/21/04	Meeting Minutes	Patti Krebs, Industrial Environmental Association (IEA)	Since manufacturing and R&D companies may use large quantities of hazardous types of materials or products, generate air emissions and have operations that create concerns with regard to noise, dust, traffic, smells, visual impacts, neighborhood surroundings or what the public would consider nuisance conditions, it is particularly important to protect large, contiguous areas zoned for manufacturing and industrial uses, with appropriate buffers between industrial uses and residential, public and quasi-public uses.	Please see response to comment 631.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

633	4/21/04	Meeting Minutes	Patti Krebs, Industrial Environmental Association (IEA)	The Industrial Environmental Association suggests the most important guideline to preserving a community's manufacturing base is to safeguard contiguous and cohesive industrial and manufacturing areas.	Please see response to comment 631.
634	4/22/04	letter	Joy Lane	I support SANDAG's concept of "smart growth" that encourages development where transportation, jobs and housing already exist or can be expanded with the least environmental and community impact and the most efficient costs.	Smart growth and a healthy environment are key concepts of the RCP.
635	4/22/04	letter	Joy Lane	I encourage SANDAG to use its financial incentives to encourage the following goal: Within the limits of SANDAG's powers, funding decisions should be made with environmental concerns at the forefront. These concerns include air and water quality, open space, and appropriate land uses.	Funding decisions require an environmental analysis to determine a project's direct and indirect impacts which could include impacts to air and water quality, open space, and land uses.
636	4/22/04	letter	Joy Lane	I encourage SANDAG to use its financial incentives to encourage the following goal: SANDAG should favor transportation methods that use advanced power systems, such as gas-electric hybrids.	Current state law allows zero emission vehicles with a single occupant to use high occupancy vehicle lanes. The State also is interested in programs to encourage alternative energy power systems.
637	4/22/04	letter	Joy Lane	I encourage SANDAG to use its financial incentives to encourage the following goal: There should be more emphasis on movement of people without the present dependence on freeway expansion as a solution to traffic congestion. The current SANDAG (and Caltrans) priorities puts freeways and major roads ahead of other transportation solutions. This emphasis should change.	As planned in MOBILITY 2030, most of the future freeway and road improvements are designed to serve bus rapid transit and high occupancy vehicles.
638	4/22/04	letter	Joy Lane	I realize the proposals envision a high-speed bus lane. After talking with your SANDAG representatives, I changed my mind about having more rail transportation and agree with the bus concept. But it won't work without adequate parking around the bus centers (a current problem with the Coaster).	We agree that parking around transit centers is a major component for a successful project.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

639	4/22/04	letter	Joy Lane	I encourage SANDAG to use its financial incentives to encourage the following goal: SANDAG should favor building projects that use renewable resources, such as advanced solar energy. New commercial and industrial development should use solar power, and existing facilities, including homeowners, should receive financial incentives to add a system.	Comments are consistent to those in the Program and Project Development and Implementation Actions in the Energy section (Chapter 4F) of the RCP.
640	4/22/04	letter	Joy Lane	I encourage SANDAG to use its financial incentives to encourage the following goal: SANDAG should favor solid waste management decisions that cause the least harm to watersheds, air quality, and land use. Many years ago, there was a proposal to convert trash to energy through the process of pyrolysis. Advanced technologies should replace reliance on landfills.	Comments are consistent to those in the Waste Management section (Chapter 4F) under the subheading 'Investment in Waste Management Infrastructure' and to those in the Countywide Siting Element, which is incorporated into the RCP by reference.
641	4/24/04	Wkshop CR	Bill Murphy	First, we have to emphasize transportation. Good transportation, good roads, and including finishing and improving freeways for Interstate 8, the additional lane all the way to Lake Jennings Road. Finishing the 52 Freeway to the 67 Freeway, that's an absolute necessity that has to be done and will be, but has to be -- not put back in the back-burner, it's got to be pushed forward and pushed forward, extending Highway 94. The freeway portion further east into the Jamacha and Jamul area, you know, for just better transportation there.	The region has placed a high priority on securing funding and advancing SR 52. Because of scarce resources, the SR 94 extension is not yet scheduled.
642	4/24/04	Wkshop CR	Bill Murphy	Make sure there is close and affordable housing for service workers and those residents that make minimum wage and below \$10 and hourly wage, not just downtown but everywhere. People should not have to drive 50 miles away or where they have to make a two or three hour drive to get to their job.	The overall goal of the Housing chapter of the RCP is to provide a variety of affordable and quality housing choices for people of all income levels and abilities.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

643	4/24/04	Wkshp CR	Mark Lewis, City of El Cajon	We hear about 5 and 15 congestion and two, three hour waits. But our day is coming, because I got flyers from the housing units advertised in Imperial County and I just know pretty soon people, because of necessit and quality of life, will have to move to Imperial County and look to Interstate 8 as their own means to coming to work. So I do know that we may chuckle and laugh at the people sitting in line on 5 and 15, but our day is coming. So we better prepare now and do the smart way, doing business now rather than wait and try to figure out how to correct the situation. So let's do it ahead of time.	The Borders Chapter of the RCP includes a discussion of the growing trend of San Diego County workers buying homes in Imperial County.
644	4/24/04	Wkshp CR	Ron Pennock	That <i>TransNet</i> initiative may fail because of the inclusion of the \$2,000 per new homeowner unit which amounts to double taxation over the 14 billion dollar tax that's already proposed. We desperately need the 14 billion dollars for roads and highways and in the next 20 years. But SANDAG may be shooting themselves in the foot politically, because of the opposition by many private property owner groups that would be opposed to the double taxation of the \$2,000 new homeowner tax.	The proposed regional development impact fee in <i>TransNet</i> would only fund regional facilities. In some cases, regional arterials or other regional facilities are already being built or paid for by local developers. In those cases, the fees would be credited against the <i>TransNet</i> development impact fee requirements.
645	4/24/04	Wkshp CR	Ron Pennock	Population numbers do not match and have no nexus with what can be built in the San Diego County to put 800,000 new homes or to accommodate 800,000 new people coming to San Diego, and as SANDAG projects correlates to many homes that cities have no room to accommodate. If SANDAG projects one million people and the County's general plan 2020 will only accommodate 200,000, and that means 800,000 would have to be absorbed by the cities. And we see absolutely no way the cities would be able to accept that amount of new people, either in their general plans or in space available for building.	Future population and economic growth are realities in the San Diego region. The RCP recognizes that local jurisdictions will need to respond to this growth by changing land use plans in appropriate areas to meet our housing needs. Existing local plans in the region do not meet these needs - only a small portion of our land is zoned for multifamily use, while most remains zoned for large lot single family. In addition to changing zoning on vacant land, jurisdictions have opportunities for residential redevelopment and infill development. While meeting our future housing needs will be a challenge, it is critical to the success of our region.
646	4/26/04	Wkshp CR	Bob Berg	I would like to see rail grade separation in Oceanside in all five road crossings.	The discussion continues regarding eventual grade separation for rail crossings.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

647	4/26/04	Wkshop CR	Bob Berg	I like the idea of the Highway 15 reversible lanes, going to Escondido. I am disappointed that Encinitas and Carlsbad are on the calendar for grade separation, but Oceanside doesn't have anything. Since the City of San Diego is already almost approved by the Federal Railway Association to have quiet zones and the majority of the city, it would probably be a good idea to just go countywide on the quiet zones until we get the funding for grade separation. San Diego would be designated a quiet zone for railways.	Quiet zones for rail is beyond the scope of the RCP.
648	4/26/04	letter	Bob Ham, Imperial Valley Association of Governments	Page 70, "Potential Replacement Airport Site" - The existing Imperial County Airport is in the process of being designated as an "International Airport," and more recently the FAA authorized spending \$400,000 to find and site a replacement airport and combine that with a possible Regional Cargo Airport. Should this prove feasible, it is likely that this region will make even more sense as the logical location for San Diego's regional passenger airport as well. It is suggested that this information be included in the draft SANDAG RCP.	Language has been added to acknowledge that the sites under consideration are both inside and outside San Diego County.
649	4/26/04	letter	Bob Ham, Imperial Valley Association of Governments	Page 184 - The draft RCP discusses High Speed Rail but limits that discussion to rail connections to the North. Given that the Imperial Valley is now beginning to become a "bedroom" community for San Diego, transportation capacity between the regions will be under pressure to increase. With the additional prospect that Imperial may also pick up the air transport burden for San Diego, SANDAG should be simultaneously seeking high speed rail routes to Imperial and beyond to Phoenix. Congressman Filner has a proposal in the House approved budget this year that would begin studying the feasibility of a San Diego - Imperial Maglev system. Future intercity transportation for trips of 500 miles or less is likely to switch to systems of high-speed rail. It is in San Diego's interests to begin now planning to be a hub rather than a terminus for a future southwest intercity rail network. Looking only to north today will assure that San Diego will be relegated to a future as California's cul-de-sac as opposed to its deserved role as a hub of southwestern travel and commerce.	As the studies by the Airport Authority continue, the RTP will be updated to reflect the region's decision regarding the new or existing site for the regional airport. The RTP will incorporate and expand on the ground access analyses for the airport site.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

650	4/26/04	Wkshop	Bob Ham, Imperial Valley Association of Governments	Coordination of Indian land development should be addressed in report. Significant impacts may be occurring or will occur as development is put in place. Many nations are proposing casinos and resorts that will be significant traffic generators. Maps showing Indian Nations and potential development should be part of report.	The RCP includes actions to improve communication and coordination with tribal governments. We are in the process of learning more about tribal developments, and will be able to include more information in future updates of the plan. We do not currently have maps of potential reservation development.
651	4/26/04	letter	Bob Ham, Imperial Valley Association of Governments	Executive Summary, page XXV, "During the next 30 years, it is estimated that more than 90,000 households will, in effect, be 'exported' to Riverside County or Baja California unless there are significant changes to add more housing to today's plans. Long-distance commuting puts a tremendous strain on our roads, freeways, and infrastructure,..." - Due to less expensive housing in Imperial Valley the number of people commuting to San Diego has increased, thus it is important to identify Imperial Valley as a area of interest to San Diego residents that seek affordable housing. This phenomenon has only recently been observed, however it is becoming evident that this region is now going to be impacted as we take on more and more of San Diego's housing burden. Accordingly, it would be appropriate for SANDAG to provide additional information on the increase on long-distance interregional commuting and capacity planning the Interstate 8 corridor between Imperial and San Diego.	The Borders Chapter of the RCP was revised to include a discussion of the recent phenomenon of interregional commuting between the Imperial Valley and San Diego County. SANDAG's Borders Committee includes a representative from Imperial County and this issue has been discussed at some of their recent meetings.
652	4/26/04	letter	Gail Goldberg, City of San Diego	A map or diagram indicating the major employment centers in the region, and identifying criteria used to make the determination, we believe, would be an asset to the RCP and provide necessary regional context for local general plans and economic policies.	The RCP provides a context for making land use and transportation decisions that serve regional employment centers. The Economic Prosperity chapter provides recommended actions for improving regional economic competitiveness. The specifics regarding type of facility and location should be addressed by local jurisdictions in conjunction with the goals and objectives of the RCP and the Regional Transportation Plan. SANDAG also produces a map of regional activity centers, which may be useful for planning purposes. Additionally, maps of employment and population densities in the year 2030 have been added to the Urban Form chapter.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

653	4/26/04	letter	Gail Goldberg, City of San Diego	In several places the element mentions the importance of public education to economic prosperity, but does not mention the steadily shrinking budgets for these services. In a regional plan there should be some discussion of what lobbying, financing or other efforts are necessary to ensure future funding/affordability of these systems.	The chapter has been revised to include language to this effect. A more detailed discussion of specific efforts to increase funding for education is beyond the scope of the RCP.
654	4/26/04	letter	Gail Goldberg, City of San Diego	On page 134, the possibility of a regional airport outside of San Diego is mentioned, "The airport does not necessarily have to be in the San Diego region to meet this objective." The following caveats should be added, "if it is serviced by high speed passenger rail and sufficient freight movement facilities (both truck and rail)."	The sentence has been revised to reflect the concepts in this comment.
655	4/26/04	letter	Gail Goldberg, City of San Diego	We believe the element should address the issues of inequity and cost of living more thoroughly. We would encourage the inclusion of data representing the difficulties of families living below the median income and poverty levels and a fuller discussion of the effects of systemic poverty as a major obstacle to the regional economic growth.	The Economic Prosperity chapter provides a mechanism to increase our region's standard of living across all income categories. The Performance Monitoring Chapter of the RCP, which includes a diverse range of measures addressing equity and other related concerns, monitors the performance of the economy. Cost of living is addressed across many chapters of the RCP, most specifically in the Housing chapter. A detailed analysis of the effects of systemic poverty is beyond the scope of the RCP, but might be considered in future updates to the document.
656	4/26/04	letter	Gail Goldberg, City of San Diego	While the element's emphasis on creating new higher paying jobs is important, it is also important to include policies on how to increase the quality of existing jobs that are not in the highest paid sectors. We would also encourage a discussion from this perspective.	The Economic Prosperity chapter addresses the quality of both high and low paying jobs by focusing economic development resources towards traded/export-oriented employment clusters. Policies designed to improve the competitiveness of our clusters positively impact jobs in other sectors.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

657	4/26/04	letter	Gail Goldberg, City of San Diego	We question the basis for including a policy which encourages privatization of government services since this has proven to be unsuccessful in many attempts (especially in California) to streamline government operations.	The decision for jurisdictions to privatize is not one entered into lightly, and it is one whose circumstances differ widely depending on the needs, aims, and financial situation of government. Accountability of the private sector and a mutually beneficial relationship should be established in any privatization agreement. The Economic Prosperity chapter suggests that the region evaluate the possibility for privatizing services on a case-by-case basis, and does not imply that it is always in our best interest to do so.
658	4/26/04	letter	Gail Goldberg, City of San Diego	We request that all references to park standards for the City of San Diego be removed for several reasons including: 1 - They do not correspond to the standards in the adopted general plan; 2 - The recreation element is currently being updated and so the new standards are yet to be determined; and 3 - As stated in the current general plan, "these figures are norms or abstract concepts, and should not be rigidly applied throughout the City."	The section has been revised to reflect the concerns expressed in this comment.
659	4/26/04	letter	Gail Goldberg, City of San Diego	The City of San Diego's Recreation Element currently states, "An ideal balance of recreational opportunities cannot be achieved through just city-wide application of numerical standards for physical facilities. These standards are important, however, they should be used with discretion rather than mechanically...Their application should be related to economic feasibility and the nature of the specific neighborhood or community, and should allow flexibility as specific areas change or the needs and desires of the residents change..." (p. 313).	The section has been revised to reflect the concerns expressed in this comment.
660	4/26/04	letter	Gail Goldberg, City of San Diego	Chapter 4B - Transportation. The 2030 Mobility Network should include major, high frequency "Blue Line" bus corridors (Figure 4B.4).	Blue Car routes are included in the 2030 Mobility Network but were not shown on the more general network map due to the amount of detail that can be clearly shown at that size.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

661	4/26/04	letter	Gail Goldberg, City of San Diego	pg. 36 - The City of San Diego 'bullet' should say that growth would be focused primarily in aging shopping centers and commercial strips, rather than in "urbanized areas." Also, the last sentence should be updated to state the City has now selected five Pilot Villages, providing an opportunity to demonstrate the "City of Villages Strategy."	Comment incorporated.
662	4/26/04	letter	Gail Goldberg, City of San Diego	pg. - 45-46 - We are commenting on the definition of smart growth opportunity areas through work on the SANDAG committees. The definition of what constitutes smart growth should be held to a high standard. The work currently being done on the Smart Growth Areas Characteristics Matrix is progressing in a positive direction.	Comment noted.
663	4/26/04	letter	Gail Goldberg, City of San Diego	pg 49 - Actions - Planning, ... - # 4 insert "and TDM programs" at the end of the sentence. And add "Develop new methods to count and forecast pedestrian mode split and the potential for walking as a mode of transportation."	Comment incorporated.
664	4/26/04	letter	Gail Goldberg, City of San Diego	pg 50 - #1 Will the Smart Growth Opportunity Areas map be replaced by the new matrix of smart growth characteristics?	The final RCP includes a matrix of smart growth area classifications, providing a range of opportunities to implement smart growth. Upon adoption of the RCP by the SANDAG Board, SANDAG will work with local jurisdictions to develop an official smart growth concept map based on the concepts contained in the matrix. The SANDAG Board will then be asked to incorporate the concept map into the RCP as an addendum.
665	4/26/04	letter	Gail Goldberg, City of San Diego	pg. 40 - Modify language discouraging "mixing" of residential and employment uses as planned collocation of uses is an adopted policy in the City's Strategic Framework Element. The 'blanket statement' that mixing uses reduces housing values and poses health risks needs to be qualified to acknowledge the benefits of appropriate collocation, based on specified uses in areas that are identified by local jurisdictions.	The language in this section of the Urban Form chapter has been modified, emphasizing that local jurisdictions should look for locations where a mix of residential and employment uses is appropriate, and that transition zones like commercial or retail can serve as transition zones or buffers between residential and industrial areas to shield residents from potential impacts.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

666	4/26/04	letter	Gail Goldberg, City of San Diego	<p>pg 45 - Densities to implement smart growth principles should be specified for all types of areas, should be highest in areas served by regional transit, and generally should be higher for the remaining types of opportunity areas. Identify how employment intensity and other non-residential uses would assist in achieving "opportunity areas" status. Recognizing that the more central part of the region contains the majority of jobs, credit should be given to provision of employment in calculating infrastructure incentives, not just housing.</p>	<p>Between the release of the draft RCP and the production of the final RCP, the Regional Planning Committee and its Working Groups worked on developing a smart growth area classification matrix, which characterizes land uses and their intensities within the seven identified categories. Employment intensities and other complimentary land uses are included in the matrix. Criteria for smart growth incentives will be developed after the RCP is adopted. The matrix will be used as a tool in developing the criteria.</p>
667	4/26/04	letter	Gail Goldberg, City of San Diego	<p>pg 46 - Blue Car Lines. The region should do more than just maintain these lines at current service levels. These bus routes should be improved (service frequency as well as customer experience factors) given the large number of people who use them, and the significant role they play in our mobility system. We are concerned about the fairness and equity when Yellow Car lines are prioritized over Blue Car lines.</p>	<p>Blue Car Lines do play a significant role in the system, and the RTP and proposed <i>TransNet</i> extension anticipate increased funding for improved Blue Car service.</p>
668	4/26/04	Wkshop CR	Gary T. Slater, Caltrans, District 12	<p>I believe that the plan should address the issue of the I-5 corridor between San Juan Capistrano and Oceanside, that puts it a few cities inside the county on either direction not right at the border. With the construction of the SR 241 connection into the I-5 near the Marine base or San Clemente, the traffic generated will significantly impact the traffic coming south from the border. Currently the ADT and the level of the service has significantly impacted the P.M. peak, and this plan currently has not presented any discussions of the long-range plans between the two counties. I think it would be important before the plan is adopted that SANDAG meet with Caltrans District 12 and the Orange County Transportation Authority and set up a meeting on long-range plans for the corridor. Currently, we were going to plan for HOV lane to the countyline, we reduced the limits in the RTP unconstrained plan to end it at Avenida Pico, because no discussions or plans were shown for San Diego County long-range plan through the base.</p>	<p>The RTP is the document that addresses the regional transportation needs of the region. SANDAG will continue to work with Caltrans, Orange County, and the TCA on the convergence of the freeways and tollways near the county border.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

669	4/26/04	Wkshop CR	Gary T. Slater, Caltrans, District 12	I mentioned the 241 connection. The 241 should be modeled for both the end of toll which will be approximately 2036 to 2040, and also as a toll facility since currently any work will probably be in the long-term unconstrained plan. We probably should model the SR 241 connection, free connection which would generate even further strings to it.	The RTP is the document that addresses the regional transportation needs of the region. SANDAG will continue to work with Caltrans, Orange County, and the TCA on the convergence of the freeways and tollways near the county border.
670	4/27/04	letter	Macie Cleary-Milan, Transportation Corridor Agencies	Chapter 4B, page 57 - Foothill Corridor South (SR 241) is included in the Regional Transportation Plan. TCA wants to assure that Foothill Corridor South is clearly mapped and labeled on all transportation base maps illustrating the RCP text. Map 4.B.4 must clearly include SR 241 just south of the San Diego/Orange County line. Unfortunately, the current map stops at the southern edge of Camp Pendleton and does not show transportation facilities, including SR 241, in the northernmost portion of the County. To avoid any public misunderstanding, we request that this base map be amended to include the entire county.	The RTP includes SR 241 in all funding scenarios, but only Figure TA 3.4 from the RTP Appendices clearly shows the facility. The RCP EIR shows the facility, as will future updates of the RTP.
671	4/27/04	letter	Macie Cleary-Milan, Transportation Corridor Agencies	Chapter 4B, page 73 - Recommended funding actions include #4, "Pursue financing opportunities such as user fees, congestion pricing, and private investments to help pay for needed transportation "improvements." Foothill Corridor South exemplifies this recommendation: it will be a priced facility constructed with private funds. However, the text in Chapter 4B does not address these forms of innovative funding. We recommend that the RCP include a discussion of pricing as a means of providing needed transportation infrastructure.	Funding issues are discussed in more detail in the IRIS chapter, under Infrastructure Revenue Options and Gaps, Financing Options. Language has been added to the Transportation Funding section in the Transportation chapter.
672	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 191 – Please update the second sentence of the fourth paragraph to read: "Based upon the treaty, California's allotment is 4.4 million AF per year, while Mexico's is 1.5 million AF per year."	The text has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

673	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 193 – Please update the second paragraph to read: “The Water Authority currently delivers 75 to 95 percent of the region’s water supply primarily through purchases of imported supplies from the Metropolitan Water District (MWD) and increasing amounts of conserved agricultural water from IID. MWD imports its supply from two main sources, the Colorado River and the State Water Project (which is pumped from the San Francisco Bay/Sacramento-San Joaquin River Delta through the California Aqueduct). The reliability of these supplies directly affects the reliability of San Diego’s overall water supply mix. A key element in Water Authority planning includes strategies to diversify the water supply sources and thereby lessening our dependence on MWD’s imported water supplies. “	The text has been amended to reflect this comment.
674	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 193 (A) – Please update the section on IID transfer to include Canal Lining Projects: “The Water Authority -SDCWA and IID Water Transfer Agreement and All American Canal and Coachella Canal Lining Projects”	The text has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

675	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	<p>Page 193 (B) – Please update the section on IID transfer to include Canal Lining Projects: “A key element in Water Authority’s SDCWA’s diversification strategy is the recently approved Imperial Irrigation District (IID) Transfer Agreement, which will allows the Water Authority SDCWA to purchase conserved Colorado River agricultural water form the Imperial Valley. The transfer agreement was approved in October 2003 after many years of complex negotiations among the water agencies and the state and federal governments. Starting in 2003, the Water Authority purchased 10,000 AF, which will increase each year to 200,000 AF in 2021. In October 2003, the Water Authority was also assigned Metropolitan’s rights to 77,700 AF per year of conserved water from projects that will line the All American Canal (ACC) and Coachella Canal (CC). These projects will reduce the loss of water that currently occurs through seepage and that conserved water will be delivered to the Water Authority. This will provide the San Diego region with an additional 8.5 million AF of water over the 110-year life of the agreement.”</p>	The text has been amended to reflect this comment.
676	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	<p>Page 193 (C) – Please update the section on IID transfer to include Canal Lining Projects: “The transfer agreement and lining projects are is a key element....The transfer and lining projects will allow the San Diego region to receive more water from the IID and therefore less water from the MWD, making....”</p>	The text has been amended to reflect this comment.
677	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	<p>Page 193 (D) - Please update the section on IID transfer to include Canal Lining Projects: Please remove the text and four bulleted statements starting at “The transfer agreement was approved in October 2003 after many years of complex....” Keep the last sentence in this section.</p>	The text has been amended to reflect this comment.
678	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	<p>Page 193 – Please update the last sentence of the fourth paragraph to read: “The transfer allows will allow the San Diego region to receive more water from the IID and therefore less water from the MWD, making it possible to reduce MWD’s withdrawals from the Colorado River.”</p>	The text has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

679	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 194 – Please revise the first sentence of the “Tribal Government Perspective” paragraph to read: “The majority of tribal reservations in San Diego County are outside of the San Diego County Water Authority’s boundaries, and are therefore causing them to be reliant on groundwater for their water needs.”	The text has been amended to reflect this comment.
680	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 195 - Please add the following language: “Analyze and address the potential impacts of water supply infrastructure investments on surrounding communities .in compliance with the California Environmental Quality Act (CEQA).”	The text has been amended to reflect this comment.
681	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 143 – Please correct the Water Authority’s web address in the first paragraph after the bullet points to read: www.sdcwa.org	The text has been amended to reflect this comment.
682	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 267 – Please revise the second and third bullet point for “Chart 3. Water” with: <ul style="list-style-type: none"> • The overall growth in demand for imported water from MWD is less than the growth in population; which is accomplished primarily through implementation of demand and system management and development of local supplies. • Approximately 40 percent of the region’s water supply will come from sources we have historically not relayed upon and do not currently rely on today; the Imperial Irrigation District water transfer, conserved water, the canal lining projects and seawater desalination. 	The chart has been revised to incorporate these changes.
683	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 309 – Please revise the term from “Acre Feet (AF)” to “Acre-Foot (AF)” and change the definition to read: “Acre-Foot (AF) - The volume of water necessary to cover one acre to a depth of one foot. Equal to 43,560 cubic feet or 325,851 gallons, or 1,233 cubic meters.”	The glossary has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

684	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 146 - Please update the first paragraph under the "Water Supply – Existing Setting" section to read: "The San Diego region is semi-arid and relies heavily on imported water supplies from a single supply source. The region has historically imported 75 percent to 95 percent of its water exclusively through the Metropolitan Water District of Southern California (MWD). Starting in 2003, the San Diego County Water Authority (Water Authority) did begin purchasing conserved agricultural water from the Imperial Irrigation District (IID)."	The text has been amended to reflect this comment.
685	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 147 – Please update Figure F.1 to read: FIGURE 4F.1 - SDCWA SERVICE AREA WITH AGENCY BOUNDARIES	The text has been amended to reflect this comment.
686	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 147 – Please update the first sentence in first paragraph to read: "The Water Authority is the wholesale water agency serving 23 retail water agencies in the San Diego our region."	The text has been amended to reflect this comment.
687	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 147 – Please update the last sentence on the page to read: "Historic and forecasted water demands for the region are shown in Figure 4F.12 where we can see an increase in demands over the next 20 years."	The text has been amended to reflect this comment.
688	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 150 – Please update the first sentence of the third paragraph to read: "Due to continuing uncertainties regarding MWD's apportionment of Colorado River water and State Project supplies, the RCP and the Water Authority's long range plans call for the region to diversify its water supply portfolio to become less reliant on a single supply source."	The text has been amended to reflect this comment.
689	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 150 – Please update the pie chart titled, "Our Water Supply in 2020" with the one attached.	The text has been amended to reflect this comment.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

690	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	Page 151 – Please update the last paragraph under “Diversifying Our Water Sources” to read: “Currently, only about five to 25 percent of the water used within the Water Authority’s service area within any given year comes from local sources, primarily from surface water reservoirs. To lessen demands on a single supply source, MWD, the region will diversify its water supply portfolio through the Water Authority Imperial Irrigation District water transfer, All American and Coachella Canal Lining Projects and development of local recycling, groundwater and desalination projects. Development of a diverse supply provides for flexibility and adaptability in the resource mix to handle potential risks associated with managing and developing supplies. These risks could include environmental constraints, lack of political will, water supply contamination, and/or lack of funding.”	The text has been amended to reflect this comment.
691	5/5/04	E-mail	Dana Friehoff, San Diego County Water Authority	One overall comment is that it is our policy to abbreviate San Diego County Water Authority as “Water Authority” not “SDCWA”.	The text has been amended to reflect this comment.
692	5/5/04	letter	Wes Peet, Fallbrook Chamber of Commerce	If you do not start with a clear assessment of our Regional Comprehensive challenges and opportunities, how can you have a Plan to deal with future reality? Allow the input and dialogue to continue so as to arrive at worthy solutions. Then finalize the plan to implement them.	The Introduction chapter of the RCP includes discussion regarding the challenges and opportunities faced by our region. SANDAG conducted considerable public outreach in preparing the draft RCP, including three rounds of workshops throughout the region. At the workshops, residents from throughout the region contributed to the drafting of the vision and core values, as well as to the goals, policy objectives, and recommended actions of the plan.

Comments and Responses on Draft Regional Comprehensive Plan
July 2004

693	5/5/04	letter	Wes Peet, Fallbrook Chamber of Commerce	<p>The Fallbrook Chamber of Commerce opposes the draft Regional Comprehensive Plan because it is fundamentally and fatally flawed. SANDAG did not allow discussion of where residents could work. Lack of any allowance of discussion regarding employment lands, or the relationship of housing, transportation, and employment, leave the study with a "black hole" sucking energy into itself.</p>	<p>There are several chapters in the RCP that discuss employment, housing, and transportation and their relationship to the distribution of land uses. The Regional Planning and Policy Framework chapter discusses land use, housing, and employment issues and promotes smarter growth, which includes a greater mixture of land uses within local communities (including employment uses). The Economic Prosperity chapter discusses a number of employment-related issues, including strategies to promote our regional employment clusters, develop an internationally competitive economy, and recommendations to strengthen the relationship between workforce requirements and educational programs. Additionally, the chapter recommends providing an adequate supply of residential and employment land for housing and businesses, creating workforce housing, achieving state-local fiscal reform, improving the region's business environment, and other actions designed to improve our competitiveness.</p>
-----	--------	--------	---	---	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

694	5/12/04	E-mail	Bruce Willbrant	<p>Even if SANDAG's projections of a slowing growth rate are correct, population growth is still a huge problem. The Regional Growth Forecast calls for about 1,000,000 more people by 2030. Look around at our freeways, cities, schools, and beaches - where are another 1,000,000 people going to fit? Anybody who has been in San Diego for more than a few years has had time to observe first-hand the negative effects of more people. Beaches are more polluted, streets are more crowded, cities and counties cannot afford to provide needed services, and the cost of housing has skyrocketed. Do we just continue to carve new subdivisions into the hillsides and backcountry, add more lanes to the freeways and more mobile classrooms to our school campuses? Smart growth policies are a noble and thoughtful attempt at coping with the symptoms of the problem, but why not address the underlying problem? The solution is not to just keep accommodating growth; the solution is to stop growing.</p>	<p>There is no question that handling the growth projected in the regional growth forecast will be challenging. A key premise of the RCP is that, collectively, current local land use plans result in a number of problems, including continued loss of agricultural land, open space, and natural habitat, higher housing prices, more long distance interregional commutes, and increasing traffic problems, among others. SANDAG has twice studied alternative future land use scenarios, using computer models to compare the future outcomes to what is likely to happen under current general plans. One of the most dramatic differences was in land consumption -- current plans have the potential to consume up to three times as much land as the smart growth alternatives. A key recommendation of the RCP is to direct transportation facility improvements and other infrastructure resources toward those areas where compact, mixed use, pedestrian-oriented development exists now, is currently planned, or has the potential for future incorporation into local land use plans. It is unrealistic to expect that we can stop growth. The RCP provides a planning framework for the region that can help us maximize our infrastructure investments, meet our infrastructure needs, and maintain and improve our quality of life.</p>
695	5/12/04	E-mail	Bruce Willbrant	<p>I encourage SANDAG to add language recognizing population growth as a problem and encouraging the public and elected officials to make responsible family planning a priority in our communities.</p>	<p>SANDAG's 2030 final forecast shows that the region's growth rate is slowing and that trend will continue. By the mid-2020s, our growth rate will fall below the national rate of about one percent. The primary drivers of this trend are declining fertility rates and the aging and eventual dying of the disproportionately large baby boom generation.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

696	5/23/04	E-mail	Thomas Mullaney, Friends of San Diego	<p>For your information, and because you and the other SANDAG staff have worked so hard on the RCP, I want to clarify: I do not object to the goals of helping people to afford housing, to link land use and development, and to preserve rural areas. All of the directors of Friends of San Diego agree on these goals. We just don't think that a focus on amending general plans to add housing can achieve worthwhile goals. A policy that would deliberately add 100,000 to 200,000 people to our region would be irresponsible. The harmful impacts would be staggering. On the other hand, if added densities were linked directly to permanent rural preservation, and the densities were added very selectively, one could make a convincing case that the burdens of the density had some tangible offsetting benefits. Such a link could be a regional program for Transfer of Development rights. Landowners and developers in the Smart Growth Opportunity Areas, when they received a windfall from upzoning, would pay part of that windfall to rural owners for permanent conservation easements. Programs for TDR's, large scale open space acquisition, agricultural preservation, etc would lead directly to results that the RCP, in its current form, only promises.</p>	<p>The RCP recognizes that the region faces a number of challenges under existing land use plans, including continued loss of agricultural land, open space, and natural habitat, higher housing prices, more long distance interregional commutes, and increasing traffic problems, among others. When taken together, the current plans do not accommodate the amount of growth anticipated in the region. The 2030 Final Forecast, which reflects the current adopted local land use plans in the region, projects that while population will increase by 37 percent over the forecast period, housing will grow by just 30 percent. The forecast shows that if local plans are not changed, demand for housing will continue to outpace the supply, just as it does today. This imbalance will result in the worsening of four trends we see in the region today: high housing costs, low vacancy rates, more persons per household ("doubling up"), and an increase in long-distance interregional commuting by the region's employees who seek less expensive housing in Riverside County, Baja California, and even Imperial County. A key recommendation of the RCP is to direct transportation facility improvements and other infrastructure resources toward those areas where compact, higher density, mixed use, pedestrian-oriented development exists now, is currently planned, or has the potential for future incorporation into local land use plans. The RCP respects local land use authority, and as such, provides an incentive-based planning framework to help maximize the region's infrastructure investments, meet its infrastructure needs, and maintain and improve its quality of life. The RCP does not call for transfer of development rights among jurisdictions in the region.</p>
-----	---------	--------	--	---	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

The Comments Below Reference the Revised Working Draft of the RCP Dated May 24, 2004					
697	5/24/04	verbal	<p>Joint Meeting among the Regional Planning Committee, the Technical Working Group, the Stakeholders Working Group, and the public (Joint Meeting)</p>	<p>Local Control - The RCP threatens local control. Residents, local policymakers, and local staffs should decide on local land use issues. Local jurisdictions have worked hard on updating their general plans, and those plans are adequate.</p>	<p>The RCP respects local land use control. There are no provisions in the RCP that either remove or weaken the land use authority of local jurisdictions, or provide SANDAG with more authority than it currently has. Chapters 1 (Introduction), 4 (Regional Planning and Policy Framework), and 9 (Implementation) of the RCP clearly state that each jurisdiction in the region makes its own decisions regarding land use. As stated in the Introduction, the RCP "recognizes that each jurisdiction in the region makes its own decisions regarding land use, and then builds upon the best elements of our existing local plans and regional infrastructure plans to provide a regional blueprint for where and how we want to grow. It identifies challenges that we face as a region, and provides a vital alternative to where we could end up if we continue with business as usual." Chapter 4 describes future outcomes if local plans are left unchanged, and Chapter 9 encourages a collaborative planning approach that builds up from the local level into a regional framework to establish stronger connections between transportation and land to better connect local and regional plans, and to foster cooperative approaches to implementing the actions contained in the plan. The RCP also clearly states that SANDAG does not have land use or regulatory authority, and does not issue permits.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

698	5/24/04	verbal	Joint Meeting	<p>Growth Promotion; Growth Control - The RCP calls for 46,000 more homes and 100,000 more people above and beyond existing local plans, and is therefore growth-inducing. Cities and regions can control their size. Economic development</p>	<p>The first comment misrepresents the main purpose of the RCP, suggesting that the goal of the RCP is to recapture 46,000 housing units that would be built in southern Riverside County or Baja California if local general plans within the San Diego region are not changed. The comment likely emanates from the project description contained in the draft EIR. The draft EIR did in fact characterize the proposed project as potentially recapturing 46,000 housing units that would have been "exported" out of the region as one method of evaluating potential impacts of implementing a number of policies included in the draft RCP. However, the project description used in the draft EIR quantifies the potential impacts of the plan for analysis purposes and is not the stated goal of the RCP. The RCP evaluates a "base case" scenario (based upon current land use elements of local jurisdictions' general plans) and asks whether the base case can be improved upon using local government policy options. Improved upon, here, means improving the region's quality of life, including better air quality and less traffic congestion, above what is expected to occur in the base case scenario.</p> <p>One of the local government policy options that would improve the region's quality of life (compared with the base case) is for jurisdictions in the region to implement "smart growth" land use policies. The RCP suggests that public policies can influence the quality of life. "How" and "where" growth occurs in the context of the RCP is more important than "how many" units are built in the region.</p>
-----	---------	--------	---------------	--	---

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

				corporations promote growth in San Diego worldwide.	<p>The EIR, not the RCP, is the document that compares the effects of locating 46,000 units inside or outside of the region to the base case scenario. The EIR assumes that because of the complexities of regional planning, coordination between local and regional agencies, and other political and fiscal realities, about 40 to 60 percent (37,000 to 55,000) of the 93,000 units forecast to be interregional commuters between 2000 and 2030 could be located in the San Diego region as a result of implementing the RCP. Where a specific population number is necessary for analysis in the EIR to address the potential environmental effects (beneficial and adverse), the midpoint of this range was used (46,000 units).</p> <p>With regard to economic development, the goal of the RCP (and many economic development agencies) is to improve the quality of job growth, and therefore, improve the standard of living when compared to a base case scenario. The Evaluation of Growth Slowing Policies for the San Diego Region report (SANDAG, 2001) demonstrated that the region cannot control its size or stop growth without inflicting severe consequences on our local economy and worsening our standard of living. If our objective is to improve our quality of life, artificially restricting growth and economic prosperity is in conflict with that objective.</p>
699	5/24/04	verbal	Joint Meeting	Existing Plans - The implementation of existing plans is already a huge challenge.	<p>There is no question that handling the growth anticipated under existing plans will be challenging. In fact, Chapter 4 of the RCP identifies serious problems with the implementation of local plans if left unchanged, including reduced open space, more expensive housing and fewer types of housing choices, an imbalance between housing and jobs, and environmental degradation. This is one of the reasons that the RCP was prepared – to better coordinate land use, transportation, infrastructure decisions, and investments at the local and regional levels in order to help the region maintain and improve its quality of life.</p>

Comments and Responses on Draft Regional Comprehensive Plan
July 2004

700	5/24/04	verbal	Joint Meeting	<p>Land Consumption - The RCP will not prevent sprawl – it does not permanently preserve rural areas, it does not contain urban growth boundaries, and it does not include a link between densities in urbanized areas and land preservation in rural areas.</p>	<p>Contrary to the comment, implementation of the RCP can reduce additional sprawl. The RCP envisions three mechanisms for directing future growth away from rural areas and into more urbanized areas. The first is relying on and supporting local land use authority. In the case of the County of San Diego, the RCP recognizes that the General Plan 2020 (GP2020) effort is attempting to focus much of the unincorporated area's growth in rural villages within rural village limit lines, significantly reducing development densities in its semi-rural and rural areas. Additionally, the RCP encourages the application of smart growth principles to vacant residential land, by promoting more compact development patterns where new communities are built. By clustering housing around compact, walkable town centers, new development on vacant land can preserve more open space for habitat and recreation. A section on preserving open space has been added to the Urban Form Chapter for additional clarification on this issue.</p> <p>The second mechanism is through the habitat conservation planning process. In the San Diego region, most remaining natural habitats are included in subregional habitat conservation plans. Two subregional plans have been approved to date – the MSCP and the MHCP, together targeting almost 200,000 acres of land for conservation, including portions of land in the County of San Diego. Additionally, the County is developing habitat conservation plans for North County, and is expected to take action this December, and then will begin planning the East County MSCP subarea plan. The RCP includes proposed policy objectives and actions that secure regional funding to acquire high value habitat areas as shown in adopted habitat plans and that provide for ongoing land management and biological monitoring.</p>
-----	---------	--------	---------------	--	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

					<p>The third mechanism is the use of transportation funding as an incentive to promote smarter growth. Because the RCP calls for SANDAG to coordinate its transportation investments with local land use decisions, many of the transportation funds that SANDAG allocates can provide incentives for smart growth development. How this strategy is implemented will be determined as SANDAG updates its transportation project prioritization process in the first phase of RCP implementation and subsequent RTP updates. A key recommendation of the RCP is to direct transportation facility improvements and other infrastructure resources toward those areas where compact, higher density, mixed use, pedestrian-oriented development exists now, is currently planned, or has the potential for future incorporation into local land use plans.</p> <p>The comment that the RCP does not include a link between densities in urbanized areas and land preservation in rural areas is correct. The RCP does not discuss concepts such as transfer of development rights between jurisdictions. However, the RCP does not preclude such programs.</p>
--	--	--	--	--	---

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

701	5/24/04	verbal	Joint Meeting	<p>Exported Units and Housing Affordability - Capturing housing units that are currently exported to Riverside and Imperial Counties and Baja California won't work and isn't needed. We can't lower our housing prices enough in our region to prevent interregional commuting.</p>	<p>The RCP is not attempting to provide comparably sized units in San Diego County at Riverside County prices. This is not reasonable given market characteristics and land prices in the two regions. The Housing Chapter of the RCP does recommend increasing the supply and variety of housing choices, especially higher density multifamily housing, for residents of all ages and income levels wishing to reside within the San Diego region. Under current plans and policies, some of these people will be forced to reside outside of the region.</p> <p>It is also true that some people will choose to live in Riverside County and other locations rather than San Diego County in order to obtain a single family detached unit at a lower cost. It is not a goal of the RCP to prevent interregional commuting. Rather, one objective of the RCP is to provide an adequate supply of housing for the region's workforce to minimize the projected rate of increase of interregional and long-distance commuting. Additionally, the Housing Chapter includes a number of actions that can result in additional local affordable housing, in addition to the construction of new units. It is anticipated that implementation of the RCP's smart growth strategies, which would result in modest density increases in key locations, will serve to meet the RCP's stated goals of improving the quality of life for people living in the region. In fact, smart growth strategies currently being implemented throughout the region, in areas such as downtown San Diego (where dwelling units are being sold even before construction is completed), La Mesa, El Cajon, and Chula Vista, are providing increased housing and lifestyle options throughout our region.</p>
-----	---------	--------	---------------	--	---

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

702	5/24/04	verbal	Joint Meeting	Impacts of RCP - The RCP results in severe impacts and the draft EIR is inadequate. The draft EIR assumes that no transportation or other infrastructure improvements are undertaken.	<p>The EIR does assume that these transportation and infrastructure improvements are made. Regarding transportation improvements, SANDAG's adopted Regional Transportation Plan (RTP), MOBILITY 2030, is a \$42 billion blueprint for a transportation system that includes a variety of strategies designed to improve mobility and travel in the San Diego region through the year 2030 and contains smart growth assumptions (intensification of land use in key locations similar to what is proposed to be implemented through the RCP). The major RTP investments in roadway and transit infrastructure and services are projected to improve level of service (LOS) on major travel corridors in the San Diego region.</p> <p>The EIR for the RCP was prepared in accordance with the California Environmental Quality Act (CEQA) and identified significant and unmitigated impacts in the areas of Land Use, Population/Housing/Employment, Transportation/ Circulation, Energy, Biological Resources, and Cultural Resources. Table 1.6-1 of the EIR contains a summary of the impacts, significance of impacts, and requirements for mitigation. Each mitigation measure was addressed to the level of specificity allowed for by the project level analysis in Sections 5.1 through 5.12 of the EIR.</p>
-----	---------	--------	---------------	---	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

703	5/24/04	verbal	Joint Meeting	<p>Traffic and Infrastructure - The RCP fails to address increased traffic and lack of infrastructure. How will the region obtain the funding to deal with traffic and environmental issues (maintenance, management, monitoring of habitat conservation plans), especially if the TransNet Extension does not pass?</p>	<p>The RCP goes to great lengths to address increased traffic and infrastructure provision as described in the Planning and Policy Framework, Transportation, Urban Form, and IRIS Chapters. In fact, the RCP suggests that the region needs to do more than what is currently included in existing plans and programs in order to meet the challenges of anticipated population growth. The RCP links transportation funds to land use decisions as an incentive to local jurisdictions for adjusting general plans and policies to address the transportation and infrastructure needs of our region.</p> <p>If the proposed TransNet extension does not pass in November 2004, there will be future transportation funding opportunities. As discussed in the Transportation Chapter, the current \$42 billion Regional Transportation Plan (RTP), MOBILITY 2030, assumes current sources and levels of federal, state, and local transportation revenue to fund proposed improvements. In addition to current sources, additional revenue is expected from three primary sources: an extension of the TransNet half-cent local sales tax, higher levels of state and federal discretionary funds, and increases in state and federal gasoline taxes based on historical trends. These three additional revenue sources account for \$12 billion of the \$42 billion plan. Other potential funding sources, such as development impact fees, user fees, and private investments, could augment traditional revenues available for transportation projects, programs, and services.</p> <p>The Healthy Environment Chapter includes an action to secure regional funding for habitat conservation plan implementation. SANDAG is committed to securing regional funding either through the extension of TransNet or some other regional source. The TransNet ordinance, recently adopted by the SANDAG Board of Directors, includes a commitment to act on additional regional funding within the timeframe necessary to allow a ballot measure to be considered by the voters no later than four years after passage of the TransNet Extension.</p>
-----	---------	--------	---------------	--	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

704	5/24/04	verbal	Joint Meeting	Community Character - Changing land uses (ex. underutilized shopping centers to primarily multi-family housing) can change community character, often in ways that existing communities do not want.	The Urban Form Chapter of the RCP addresses the importance of preserving community character as the region continues to grow. It emphasizes that good urban design and an active public participation process are the keys to land use changes that are successfully integrated into the community.
705	5/24/04	verbal	Joint Meeting	Housing Mix - People want houses with yards – condominiums and apartments are not the solution for everyone's housing needs	We agree that there is no single housing type that will meet all housing needs, and in response the RCP promotes the provision of a variety of housing types.
706	5/24/04	verbal	Joint Meeting	Water Supply - Need to consider water needs; need to conduct modeling on water supply.	<p>SANDAG and the San Diego County Water Authority (SDCWA) have a memorandum of understanding that SDCWA will use SANDAG population forecasts for their future water planning efforts. If the RCP is approved and local jurisdictions make subsequent changes to their local plans increasing housing capacities, then SDCWA will factor the additional population into their forecast as reflected by SANDAG's next forecast, and that information will be used by SDCWA during their next water planning update. Comment Letter S on the draft EIR, from the SDCWA indicated that "the Regional Water Facility Master Plan is flexible enough to allow for the sizing and timing of water facilities to be adjusted to meet the demand, whether it increases or decreases from the Year 2020 forecasts."</p> <p>Mitigation measure ServSys-1 in the EIR states that water, sewer/wastewater, and landfill providers shall periodically update plans to ensure adequate facilities are available to meet projected locations and intensities of growth. Implementation of these mitigation measures will reduce the potentially significant impact to water facilities and supplies to below a level of significance.</p> <p>Furthermore, recent legislation has sought to provide greater ties between land use planning, growth, and water supply. State legislation requires the region to assure that sufficient water supplies are available before new development is approved.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

707	5/24/04	verbal	Joint Meeting	<p>Resolution - A "Resolution for Planned Growth and Local Control" should be pursued to amend the RCP to retain local government control and avoid growth inducement, and to achieve a better balance of employment growth and housing growth.</p>	<p>The RCP does not need to be amended for local control to be maintained. As discussed earlier, the RCP clearly respects local government control of land use. Additionally, several chapters of the RCP, including the Regional Planning and Policy Framework, Housing, Economic Prosperity, and Borders Chapters, recognize that current local general plans allow for more growth in jobs than housing and that local plans largely separate residential areas from job centers, resulting in more and longer interregional commutes, increased energy consumption, and other impacts. The RCP includes goals, policy objectives, and actions to address these jobs / housing issues. Implementation of RCP actions could result in the construction of additional housing units above and beyond those included in existing general plans. The draft EIR analyzes the potential impacts of the implementation of the RCP and compares it to the implementation of existing local plans, concluding in its "plan-to-plan" analysis that overall, the region fares better under the Regional Comprehensive Plan.</p>
708	5/24/04	verbal	Joint Meeting	<p>Chapter 1: First Person/Third Person - Who does "we" and "our" refer to in the RCP – the SANDAG Board, the staff, the residents, the stakeholders?</p>	<p>"We" in the RCP is meant to be representative of the collective people of the San Diego region, inclusive of the citizenry and government representatives. During the course of the preparation of the RCP, many people, groups, elected officials, and local staff members were involved in defining the regional vision and core values, and contributing to the content included in each of the chapters. Staff has reviewed the use of the words "we" and "our" in the chapters, and for purposes of clarity, replaced the terms where specific entities (such as SANDAG, for example) were implied but not used.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

709	5/24/04	verbal	Joint Meeting	Chapter 1: Project Description - The RCP does not reflect the project description contained in the draft EIR – people move based on economics and lifestyle – stopping emigration should not be a goal of the RCP.	Stopping emigration is not a goal of the RCP. A goal in the Borders Chapter of the RCP is to achieve a better mix of, and accessibility to, jobs and housing throughout our international and interregional borders and with the tribal governments. Additionally, a goal of the Housing Chapter is to provide a variety of affordable and quality housing choices for people of all income levels and abilities throughout the region. Based on comments generated at the May 24, 2004 Joint Meeting and on comments submitted on the draft EIR, staff has clarified the project description in the Final EIR. The RCP is reflected in the project description of the EIR; however the EIR provided a quantitative measure of increased housing for analysis purposes only.
710	5/24/04	verbal	Joint Meeting	Chapter 1: Environmental Conditions: The Overview Chapter should include environmental conditions.	The Overview Chapter is primarily intended to provide a very general portrayal of the current state and future trends of the region's population and housing characteristics. It does contain some regional land use facts and figures, including the amount of constrained lands and the current status of our regional open space preservation efforts. The Healthy Environment Chapter is a more appropriate place for a detailed, subregional discussion of environmental conditions.
711	5/24/04	verbal	Joint Meeting	Chapter 4A: Design of Transportation Systems - The Urban Form Chapter is missing a discussion on the importance of the design of transportation facilities to communities.	A discussion on the importance of transportation facility design to the walkability of a community has been added to the Key Issues section of the Urban Form Chapter. The addition discusses the importance of balancing the need for auto access with the need for safe, convenient and attractive pedestrian and bicycle access.
712	5/24/04	verbal	Joint Meeting	Chapter 4A: Measuring Mixed Use - The formula in the Urban Form Chapter for measuring mixed use should be dropped. Mixed use should be defined on an area-wide basis, not on a project basis.	The notes to Table 4A.2, Smart Growth Area Classifications, include a description of how land use intensities should be calculated for residential, employment, and mixed use development within the context of the categories identified in the matrix. These are not intended to be definitions of land use types. To clarify this point, the heading for this note has been modified.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

713	5/24/04	verbal	Joint Meeting	Chapter 4A: Preservation of Natural Areas - The Urban Form Chapter should include concepts contained in the Healthy Environment Chapter related to the preservation of natural areas.	The Urban Form Chapter includes a policy objective to protect natural systems, high value habitat areas and other open space areas that define the character of our communities. Also, the Urban Form Chapter states that the region's urban form is defined by its physical features and its distinct communities – canyons, river valleys, and coastal estuaries – as framing our cities and towns to provide natural boundaries. The region's habitat conservation plans are recognized as influencing development and conservation patterns in the region. In addition, a discussion on the relationship between urban form and the preservation of open space has been added to the Key Issues section of the Chapter.
714	5/24/04	verbal	Joint Meeting	Chapter 4A: Fire Management - The Urban Form Chapter should address fire issues as related to unincorporated rural areas.	The Urban Form Chapter addresses the need to design communities to facilitate protection from fires; the Chapter does not distinguish between urban and rural communities. The plan also supports reduced exposure to the risks of wild fires in rural areas by encouraging more development within the urbanized areas.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

715	5/24/04	verbal	Joint Meeting	Chapter 4A: Natural and Community Open Space - When discussing incentives, the Urban Form Chapter should include the preservation of more natural and community open space as a result of clustering. Additionally, the goal of the Urban Form Chapter should include, "while saving more open space."	The following goal of the Urban Form Chapter has been modified to include the italicized text: "Focus future population and job growth away from rural areas and closer to existing and planned job centers and public facilities <i>to preserve open space and to make more efficient use of existing urban infrastructure.</i> " One of the policy objectives in the Urban Form Chapter is the protection of agricultural areas, natural systems, high-value habitat areas, and other open-space areas that define the character of our communities. In addition, one of the actions states that natural resources should be preserved. The Chapter specifically mentions the unique physical features of our communities – canyons, river valleys, and coastal estuaries – as framing our cities and towns to provide natural boundaries. The habitat conservation plans influence future development and conservation patterns in the region; serving as a natural greenbelt winding through the region. Finally, the definition of Smart Growth Opportunity Areas in rural settings includes the County of San Diego's GP2020 concept of a rural village limit line that would contain all but very low density development in rural areas. These Smart Growth Opportunity Areas will be the focus of SANDAG's Smart Growth Incentive Program. Finally, the "Principles for Developing Criteria for Smart Growth Incentive Programs" contain language regarding funding for other smart growth activities, including habitat protection and the like.
716	5/24/04	E-mail	Joint Meeting	Chapter 4B: High Speed Rail - The High Speed Rail (HSR) discussion differs between the Transportation Chapter (page 82) and the discussion in the Borders Chapter (page 214). The information given on page 214 should also be used in the Transportation Chapter. The Coastal Corridor discussed on page 82 will act as a feeder to the HSR system.	The discussion of high speed rail in the Transportation Chapter has been revised to be consistent with the discussion in the Borders Chapter.
717	5/24/04	E-mail	Joint Meeting	Chapter 4B: Tribal Governments - Page 84: Sentence two should read "Gaming-related and other types of development has led to rapid economic growth for many tribes....."	The requested change has been made.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

718	5/24/04	E-mail	Joint Meeting	Chapter 4B: Movable Barriers - Page 91, Program and Project Development #2: Change movable lanes to movable barriers. Include interconnected and real time travel information to the priority signalization.	The action has been revised to include movable barriers, interconnected traffic management systems, and real-time traveler information.
719	5/24/04	verbal	Joint Meeting	Chapter 4B: Regionally Significant Projects - The RCP needs a clearer definition of "regionally-significant projects" per the California Environmental Quality Act (CEQA) and the Congestion Management Program (CMP).	The Transportation Chapter includes a section that discusses the Enhanced CEQA Review process related to the Congestion Management Program and large development projects (projects generating 2,400 or more average daily trips or 200 or more peak period trips). Additionally, the Implementation Chapter calls for the development and implementation of an improved intergovernmental review process where SANDAG and other public agencies assess proposed local development projects that have significant regional impacts within the context of RCP goals and policy objectives. Text has been added to the Implementation Chapter reflecting that the improved intergovernmental review process will seek to better define "regionally significant" projects, which should be reviewed for compatibility with regional plans, including the RCP, RTP, CMP, and habitat conservation plans, and that an expanded intergovernmental review process will provide an opportunity to address issues beyond transportation, providing a more comprehensive planning approach, as advocated by the RCP.
720	5/24/04	verbal	Joint Meeting	Chapter 4C: Cost Analysis - SANDAG should conduct a cost analysis – ex. upfront costs of green building versus long-term savings.	This is beyond the scope of the RCP, but would be a good topic for future housing forums. This topic will be relayed to the Regional Housing Task Force for consideration.
721	5/24/04	verbal	Joint Meeting	Chapter 4C: Housing Affordability - The statewide formulas related to housing affordability are unrealistic.	The statewide formulas related to housing affordability consider a household to be "overpaying" for housing if they are paying 30 percent or more of their income toward housing costs. While many households can and do pay more than 30 percent of their income toward housing costs, for lower income households this can represent an extreme burden, and leave them with few resources for other necessary expenses such as food, health care, and transportation.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

722	5/24/04	verbal	Joint Meeting	Chapter 4C: Replacement Housing - The RCP should be realistic about replacing homes lost through redevelopment.	The action in the Housing Chapter regarding replacement of homes has been changed to reflect the fact that while in some cases the provision of replacement housing for lower income residents is required by state law, the requirement might not be feasible in all circumstances. The action now focuses on developing strategies to provide replacement housing (versus actually providing replacement housing) for lower income residents as conversion, demolition, redevelopment and/or infill development occurs.
723	5/24/04	verbal	Joint Meeting	Chapter 4C: Homelessness - Need to address homelessness in the RCP.	<p>The RCP does address homelessness. Homelessness is discussed in the "meeting our diverse housing needs" section of the Housing Chapter as "one of the biggest housing-related challenges facing the San Diego region today." Statistics from the Regional Task Force on the Homeless highlight the need for affordable supportive and transitional housing. Additionally, the Housing Chapter includes three actions that address homelessness:</p> <ul style="list-style-type: none"> * Identify and rezone appropriate sites for homeless facilities, transitional housing, farmworker housing, and housing for those in need of supportive services, while not disproportionately siting them in any one community. * Pursue and ensure the lawful and efficient use of existing funds for the creation of additional affordable housing for families, seniors, persons with disabilities, the homeless, and other lower income residents. * Develop new funding sources for the creation of additional affordable housing for families, seniors, persons with disabilities, the homeless, and other lower income residents, such as housing trust funds, linkage fees, and bonds.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

724	5/24/04	verbal	Joint Meeting	Chapter 4D: Agricultural Buffers - Agricultural buffers should be added to the list of Action items.	Agricultural buffers, as they relate to native habitats and urban development, are a component of the habitat management plans that have been developed for the habitat conservation plans. The Healthy Environment Chapter of the RCP includes actions to assure coordination and cooperation throughout the region on habitat management and monitoring functions and to secure funding for ongoing land management and biological monitoring of high-value habitat areas.
725	5/24/04	verbal	Joint Meeting	Chapter 4D: Ground Water - Comments on overdrafts of ground water by nurseries should be added.	Overdrafts are directly related to safe yields which are the annual amount of water that can be taken from a source of supply over a period of years without depleting that source beyond its ability to be replenished naturally in "wet years." Water districts responsible for groundwater basins used for potable water are responsible for safe yield. The scope of the RCP did not include a discussion of safe yields. The Implementation Chapter states that additional topics will be considered in future updates to the plan, and this topic could conceivably be considered in future updates.
726	5/24/04	E-mail	Joint Meeting	Chapter 4D: Fire Management - The Healthy Environment Chapter should recognize that people are moving into, not just closer to, habitat areas. Propose deleting the sentence regarding roads into habitat for fire access as it does not contribute to prevention, but may increase access to remote areas for firebugs. The RCP is skewed too heavily towards roads and clearing and not enough towards subdivision and land planning design to locate housing where there is adequate egress. Natural fire movement is not aimed (canyon tops are like chimney flues in a fire) at homes. Fencing and planting within 30-100 feet of the home is most critical so as to not prevent a fire ladder from reaching the home. The RCP should acknowledge that no amount of fire breaks will protect us in a wind and drought driven firestorm.	The Healthy Environment Chapter was changed to state that the fire management strategy must provide sufficient fire suppression equipment and personnel; it does not suggest that roads for fire access be built in habitat areas. The habitat management plans include provisions to achieve biological resource goals and hazard reduction for humans and their property. In the Urban Form Chapter, the public safety section was amended to state that the design of the community also should facilitate protection from fires and design in sufficient fuel management zones (i.e., fire breaks).

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

727	5/24/04	verbal	Joint Meeting	Chapter 4E: Economic Prosperity - The Economic Prosperity Chapter should include actions relating to housing and redevelopment opportunities.	<p>The Economic Prosperity Chapter does include a discussion of these important issues and includes actions related to housing. The Prosperity Actions are designed to increase the supply of homes in the region, raise incomes, and pursue state-local fiscal reform, which taken together and along with other actions outlined in the Housing Chapter, will help make housing more affordable to our residents. There are numerous actions relating to redevelopment opportunities throughout the RCP; additional emphasis on redevelopment has been added to the actions in the Economic Prosperity Chapter in response to this comment.</p>
728	5/24/04	E-mail	Joint Meeting	Chapter 4F: Energy - The Energy section does not sufficiently push the envelope for renewables.	<p>The RCP includes the following action: "Develop renewable energy resources including wind, solar, and geothermal, to help meet the region's needs in an environmentally-sensitive manner," and includes other actions relating to energy conservation and efficiency.</p> <p>The amount of renewable energy from in-County supplies in 2002 was 25.1 megawatts (MW), or less than one percent. In 2002, legislation was enacted to create a Renewable Portfolio Standard (RPS). The RPS requires all investor-owned utilities in California to provide by 2017 20% of their overall electric supply with energy supplied by renewable energy resources, including wind, solar and geothermal.</p> <p>In the last 3 years, there has been a dramatic increase in the use of solar technologies as a result of increased consumer awareness, consumer response to high electricity prices, and enhanced incentives. Late in 2002, SDG&E procured approximately 237 MW of renewables (including wind, landfill gas and biomass), which increased total regional energy supplies from under 1% to approximately 7%. The targets above are based on the goals established in the renewable portfolio standard. But they go further by achieving the RPS requirements sooner than 2017, and then continuing to increase the use of renewables to achieve double the RPS standard by 2030.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

				<p>Continued: Chapter 4F: Energy - The Energy section does not sufficiently push the envelope for renewables.</p>	<p>SANDAG recently formed the Energy Working Group (EWG) that reports to the Regional Planning Committee. One of the EWG's responsibilities is to evaluate renewable resource targets identified in the Regional Energy Strategy and update the targets to ensure the region is sufficiently aggressive in moving beyond the state standards.</p>
				<p>Chapter 4F: Waste Generation Assumptions and Not Enough Support of Source Reduction, Recycling, and Use of Recycled Materials - "The numbers in Table 4F-1 for growth of tons of waste generated are puzzling, when compared to the numbers in Table 2.1 for population growth. The latter calls for a 37% increase in population between 2000 and 2030, whereas generation of waste is projected to grow by 98% between 2000 and 2020! If the amount of trash per person is projected to grow faster than the population, this is a major problem that should be addressed in Chapter 4F with proposed additional</p>	<p>Table 3.1 depicts the forecasted population growth in the San Diego region between 2000 and 2030. Table 4F.1 depicts the estimated waste disposal amounts in the San Diego region between 2000 and 2020. The population projection is derived from SANDAG's Final 2030 Forecast; the waste estimates are a direct reproduction of estimated future disposal needs at facilities in San Diego County. The disposed tons are measured by the Disposal Reporting System (DRS), which is administered by the California Integrated Waste Management Board (CIWMB). The figures used to project the disposal figures for the region were based on actual tonnages reported by the CIWMB from 1995-2001.</p> <p>There are several reasons that the rate of population growth is lower than the projected growth rate of solid waste disposal tonnages. Disposal tonnages are affected by fluctuations in imported and exported solid waste tonnages, as well as changes in population and business activity. There is not a 1 to 1 correlation between population and waste tonnage. Furthermore, disposal rates may increase for a number of reasons, such as additional construction and demolition activity, more yard waste, or additional population and its related population-serving activity. Disposal tonnages can be reduced through additional recycling and other diversion activities or by a decline in economic activity.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

729	5/24/2004	verbal	Joint Meeting	<p>recycling measures. On the reasonable assumption that the amount of trash grows at the same rate as the population, the number of tons generated per year would be projected to be about 9 million; if the amount diverted were increased to 60%, the total disposed would be approximately the same as today. The point is, the assumptions about the growth rate in trash generated are unusual, and they are critical to the conclusions, so they should be stated and justified, especially in view of the controversy surrounding the siting or expanding of landfills." Additionally, the RCP is not written to powerfully support source reduction, recycling, and use of recycled materials, and it supports the Gregory Canyon landfill as necessary to meet the region's disposal needs.</p>	<p>To address the estimated disposal tonnages, Chapter 4F emphasizes that greater diversion levels result in additional years of landfill capacity – for example, the Chapter explains that a 55% diversion rate results in two additional years of landfill capacity; each 10% increase in the region could yield four to six additional years; and at 75% diversion starting in 2005, there would be no need for additional landfill space during the 15-year capacity requirement of the Countywide Siting Element.</p> <p>The Chapter recognizes the Countywide Siting Element of the Countywide Integrated Waste Management Plan as the document that must demonstrate 15 years of disposal for solid waste for all jurisdictions in the region, and acknowledges that the Gregory Canyon landfill is currently contained in the Countywide Siting Element as a possible landfill site. However, the first policy objective in Chapter 4F clearly calls for minimizing the need for additional landfills and providing appropriate infrastructure for resource recovery, management, and disposal facilities; the second policy objective calls for exceeding the state-mandated recycling rate of 50% and working toward a 75% diversion rate. Additionally, four of the six actions call for recycling and waste reduction efforts, ranging from securing an appropriate network of sites for recycling, resource recovery, composting facilities, and transfer stations, to providing incentives and education / training programs for waste reduction and resource recovery.</p>
730	5/24/04	E-mail	Joint Meeting	<p>Chapter 5: Desert Line - The Borders Chapter should state more clearly the status of the Desert Line of the SD&AE.</p>	<p>The Desert Line references have been updated to reflect the current status.</p>
731	5/24/04	E-mail	Joint Meeting	<p>Chapter 5: Maps of Tribal Nations - Page 197 Figure 5.2: This figure shows parts of the Santa Ysabel nation within the Mesa Grande nation. This has created some discussion from both tribal governments. Caltrans has researched this issue and has corrected its maps, which are available for use in the RCP.</p>	<p>An updated map has been included in the final RCP.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

732	5/24/04	E-mail	Joint Meeting	Chapter 5: Compacts - Page 200, Tribal Reservations: There are 14 tribes, not 12, within San Diego County that have gaming compacts signed and ratified with the State of California.	This correction has been made.
733	5/24/04	E-mail	Joint Meeting	Chapter 5: High Speed Rail - Page 214: Good discussion of High Speed Rail. Should use this information in the Transportation Chapter (see comment above)	The discussion of high speed rail in the Transportation Chapter has been revised to be consistent with the discussion in the Borders Chapter
734	5/24/04	E-mail	Joint Meeting	Chapter 6: Cost of Living - Page 251: Because the federal poverty level is so out of tune with what it costs to live here, can we use another statistic which will relate to cost of living? For example, the California Budget Project produces annual cost of living assessments for all counties in California. Their most recent publication is, Making Ends Meet: How Much Does It Cost to Raise a Family in California? Oct. 2003.	We agree that the federal poverty level is extremely low. Unfortunately, while it is beneficial to have reports that quantify the cost of living in San Diego, we are not able to obtain accurate information on the percentage of households in the region that actually earn the hourly wage or salaries listed in those reports. However, information will be added on the number of households that are considered extremely low income, very low income, and low income.
735	5/24/04	E-mail	Joint Meeting	Chapter 6: Urban Form Action - Page 255: The use of "heavy" industrial at the end of action #1 is too limiting- sources often considered light industrial can also be very polluting. "Heavy" should be stricken from this sentence.	This action was changed to read "Avoid and mitigate incompatible land uses, for example, by establishing buffers or transition zones between housing and industrial uses or major transportation corridors that could pose health risks".
736	5/24/04	E-mail	Joint Meeting	Chapter 6: Buffering Housing from Freeways - The smart growth opportunity areas map in the EIR shows encouragement of additional housing development near the freeways. We should not muddle the message of buffering the freeways with other types of uses. The California Air Resources Board recommends buffers of 500 feet from roads with over 100,000 vehicle trips per day. I recognize we want to encourage housing development near transportation corridors, but can that be with the caveat that it not be located too close to major polluting freeways?	The action listed in the response above now addresses the potential location of housing near major transportation corridors. In addition, language was added to the Key Issues section of the Urban Form Chapter to clarify that major transportation facilities are inappropriate within residential areas without significant mitigation.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

737	5/24/04	Verbal	Joint Meeting	<p>Chapter 7: Infrastructure Financing - The RCP should be honest and upfront about existing infrastructure costs and lack of financing. Additionally, the IRIS should tabulate the regional expenditure deficit created by growth over the next twenty five years. Page 275 of the IRIS should include a discussion of the use of development impact fees.</p>	<p>The Integrated Regional Infrastructure Strategy (IRIS), an element of the RCP, contains extensive analysis of eight of the most important infrastructure areas affecting the region's quality of life, including Transportation, Water, Wastewater, Storm Water, Solid Waste, Energy, Education, and Parks and Open Space. With regard to funding infrastructure and infrastructure deficits, the IRIS is very clear. "Whether one considers infrastructure needs at the federal, state, or local level, one finding is consistent across all infrastructure providers: the overall request for infrastructure resources is greater than the available pool of resources." Given the resources available and recognizing that all federal, state, and local public facilities and services work within limited resources, most of these eight infrastructure areas have operating and capital improvement budgets designed to meet the infrastructure needs each is responsible for providing. In other words, spending more than you have is a deficit. Keeping spending within the limited resources available is not a deficit.</p> <p>Most of the region's eight infrastructure areas have a system in place to address their immediate needs and prioritize their expenditures. However, most infrastructure planning is done without a framework that would coordinate long-term visionary planning with the short term capital expenditures. Integration of long range planning with current expenditures should be standard practice as it is with transportation and water supply.</p>
-----	---------	--------	---------------	---	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

737	5/24/04	Verbal	Joint Meeting	<p>Continued: Chapter 7: Infrastructure Financing - The RCP should be honest and upfront about existing infrastructure costs and lack of financing. Additionally, the IRIS should tabulate the regional expenditure deficit created by growth over the next twenty five years. Page 275 of the IRIS should include a discussion of the use of development impact fees.</p>	<p>One of the goals of the RCP in the IRIS Chapter is to create a planning framework that coordinates and links long-term goals with short term capital expenditures across infrastructure providers. To accomplish this goal, the IRIS puts the most important pieces of the infrastructure puzzle on the table at one time, substantially improving the region's opportunities to address needs in a comprehensive, not piecemeal fashion. Also, some providers are dependent upon sources of funding or behavioral changes that must take place in order for them to implement their strategic plans and accomplish their goals. For example, implementation of the RTP requires an extension of the TransNet 1/2-cent sales tax program, and meeting the energy, water, and solid waste needs of the region will require additional levels of recycling and conservation beyond what occurs today. If these behavioral changes do not occur as planned, the implementation of the strategic planning and capital budgeting will need to be adjusted to compensate.</p>
-----	---------	--------	---------------	---	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

737	5/24/04	Verbal	Joint Meeting	<p>Continued: Chapter 7: Infrastructure Financing - The RCP should be honest and upfront about existing infrastructure costs and lack of financing. Additionally, the IRIS should tabulate the regional expenditure deficit created by growth over the next twenty five years. Page 275 of the IRIS should include a discussion of the use of development impact fees.</p>	<p>The data sources for the capital improvement and operating budgets contained in the IRIS and its supporting Technical Appendices are the adopted budgets for the fiscal year 2003 from the local jurisdictions and agencies that provide and operate these eight areas of infrastructure. Tables 7.2 and 7.3 in the IRIS provide important information about how infrastructure providers within the region plan to allocate their resources for both capital improvements and operations and maintenance. According to these budgets, the region plans to spend approximately \$8 billion during FY 2003 for operations and maintenance and more than \$11 billion between FY 2003 and FY 2007 for capital improvements. Interested readers should also refer to the IRIS Technical Appendices for additional discussion (including expenditure and revenue data) of each infrastructure area.</p> <p>The IRIS also identifies infrastructure areas with insufficient operating and capital improvement budgets or strategies to acquire needed resources, including the preservation of habitat and open space, storm water collection and treatment, and beach sand replenishment. The IRIS identifies a variety of funding sources or methods to obtain funding for these infrastructure areas and others, as shown in Table 7.1.</p>
-----	---------	--------	---------------	---	--

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

737	5/24/04	Verbal	Joint Meeting	<p>Continued: Chapter 7: Infrastructure Financing - The RCP should be honest and upfront about existing infrastructure costs and lack of financing. Additionally, the IRIS should tabulate the regional expenditure deficit created by growth over the next twenty five years. Page 275 of the IRIS should include a discussion of the use of development impact fees.</p>	<p>All infrastructure needs cannot be met immediately and timing is the key to ensuring the adequacy of infrastructure services and funding. The IRIS recommends a phased and incremental approach recognizing the need to provide all necessary infrastructure in a timely manner that reflects the completion of new development or redevelopment projects. The IRIS identifies a strategy and mechanism to accomplish this goal, beginning with the creation of an incentive and competitive based process that will prioritize the use of transportation funds based in part on the compatibility of the land use plans with transportation facilities. The RCP recommends that transportation funds be used as an incentive to encourage local jurisdictions to create smart growth opportunity areas; areas that are expected to improve the cost effectiveness and efficiency of dealing with the impacts from urban change and growth resulting in an improved quality of life in the region. Because the land use elements of general plans serve as a planning framework for developers and most infrastructure providers, any change in the general plans will need to be addressed in the capital improvement programs of most infrastructure and service providers. Thus a stronger transportation-land use connection will also result in a coordinated process to prioritize and synchronize capital improvement programs and strategic plans in other infrastructure areas, as illustrated in Figure 7.5 of the IRIS.</p>
-----	---------	--------	---------------	---	---

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

737	5/24/04	Verbal	Joint Meeting	<p>Continued: Chapter 7: Infrastructure Financing - The RCP should be honest and upfront about existing infrastructure costs and lack of financing. Additionally, the IRIS should tabulate the regional expenditure deficit created by growth over the next twenty five years. Page 275 of the IRIS should include a discussion of the use of development impact fees.</p>	<p>The RCP is based on the premise that we must plan for our future differently than we have in our past and we must act on those plans—striving to create an urban form that supports sustainable and balanced communities with a high quality of life. The region’s quality of life, as expressed in the Core Values of the RCP, is greatly affected by the quality of our infrastructure. As the San Diego region continues to change, we must regularly assess the ability of our infrastructure to keep pace and to maintain our quality of life at acceptable levels. As long as infrastructure expenditures are working towards long-term goals that are compatible with the goals and objectives of the RCP, then the region is making progress toward addressing our infrastructure needs in an efficient and targeted manner.</p> <p>Finally, with regard to development impact fees, the IRIS does include a discussion of the use of development impact fees in the financing options section; they are categorized as fees and charges for current facilities and services. In addition, the proposed TransNet ordinance and ballot measure requesting residents to extend the existing ½ cent sales tax revenue program used to help pay for needed transportation improvements includes a provision for establishing a development impact fee to help pay for regional transportation facilities, as described in the IRIS Chapter.</p>
738	5/24/04	E-mail	Joint Meeting	<p>Chapter 8: Energy Indicators - This section should contain EJ or equity indicators. Tracking economic indicators alone is insufficient. This data should also be tracked against race to ensure that all segments of the population are benefiting from the plan. So, indicators like income, housing accessibility, and employment numbers should be tracked across the different races. Additionally, there are no indicators to get at some of the proximity issues that plague EJ communities. Perhaps we could look at population living in mixed industrial/residential zones?</p>	<p>We agree that the equity indicators could be strengthened, and where possible we will include information on race and ethnicity. While we do not have information on the population living in mixed-industrial/residential zones, we will be attempting to add periodic indicators that better address environmental justice and equity concerns.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

739	5/24/04	verbal	Joint Meeting	Chapter 8: Monitoring Performance of Service Providers - Additional growth will place increasing demands on service providers; we should monitor the performance of service providers in responding to customer requests.	The Performance Monitoring Chapter identifies both annual and periodic performance indicators related to the goals and objectives of the RCP. Measures of customer service indicators could be added as periodic indicators in topic areas that the plan addresses, such as energy and water supply.
740	5/24/04	verbal	Joint Meeting	Chapter 9: Link Smart Growth Opportunity Areas (SGOAs) to Parks and Open Space - Should mention that the establishment of a SGOA will be linked to the creation of more parks and protected open space.	<p>The RCP defines smart growth areas as places that accommodate, or have the potential to accommodate, higher residential and/or employment densities. They are pedestrian-friendly activity centers that are connected to other activity centers by transit or could be in the future. While some general principles may apply to any smart growth area, local character will influence how it is manifested. Open space is an important element of that local character.</p> <p>The RCP promotes focusing future population and job growth away from rural areas and closer to existing and planned job centers and public facilities. It promotes the protection of agricultural areas, natural systems, high-value habitat areas, and other open-space areas that define the character of our communities. And, it states that natural resources should be preserved. The RCP specifically mentions the unique physical features of our communities – canyons, river valleys, and coastal estuaries – as framing our cities and towns to provide natural boundaries. The habitat conservation plans influence future development and conservation patterns in the region, serving as a natural greenbelt winding through the region.</p> <p>Additionally, language has been added to the Implementation Chapter, specifically, the "Guidelines for Strengthening the Local/Regional Plan Connection," encouraging protection of urban habitat areas and the provision of open space for recreation in Smart Growth Opportunity Areas.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

741	6/22/04	letter	Gary Pryor, County of San Diego	There are some basic guiding principles that should be threaded through the entire document and process as follows. The RCP should not include specific mandates for staff positions or roles or committees. Budgets and staffing are based on annual budget processes, and no jobs, functions, nor working group/task forces should be mandated by the RCP.	The actions contained in the RCP are not mandates or obligations. SANDAG will clarify this point by incorporating the word "Recommended" before the word "Actions" in the "Goals, Policy Objectives, and Actions" section of each chapter. As currently written, the RCP does not include mandates for staff positions, roles, or committees. However, to ensure complete clarity, SANDAG will incorporate this overall concept into the Implementation chapter. Additionally, as stated on page 340 in the Implementation chapter of the Final Draft RCP (July 2004), " <i>SANDAG will review the Strategic Initiatives on an annual basis in order to coordinate both internal and external agency work programs and budget cycles.</i> " The Regional Planning Technical Working Group will assist with prioritizing the Strategic Initiatives identified for FY 2005. Finally, SANDAG does not intend to increase member dues to cover RCP responsibilities.
742	6/22/04	letter	Gary Pryor, County of San Diego	The RCP should not contain action programs that cannot be implemented at the local level. State or federal initiatives should be couched as "recommendations."	See comment #741.
743	6/22/04	letter	Gary Pryor, County of San Diego	The RCP should not obligate the nineteen jurisdictions to do more than can be reasonably accomplished in the timeframe. Priorities need to be set and timelines elongated. It is not reasonable to expect the County to participate in 59 different action programs in the next fiscal year (21 as lead and 38 as support).	See comment #741.
744	6/22/04	letter	Gary Pryor, County of San Diego	The RCP should not include any programs for SANDAG to perform than cannot be accomplished within SANDAG's existing budget allocation. Member dues should not be increased to cover these responsibilities. If necessary, timelines should be elongated to keep the work within existing resources.	See comment #741.
745	6/22/04	letter	Gary Pryor, County of San Diego	The RCP should not advocate any increased State mandates on member agencies. This violates our legislative program.	The RCP does not advocate new or increased State mandates on member agencies. SANDAG staff requests that County staff identify specific examples in the RCP that may imply new or increased mandates so that clarifications may be made if necessary.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

746	6/22/04	letter	Gary Pryor, County of San Diego	The RCP should not advocate the addition of new penalties for its member agencies, nor should it add any new government functions that are not already in existence.	The RCP does not advocate the addition of new penalties on member agencies. SANDAG staff requests that County staff identify specific examples in the RCP that may imply new penalties so that clarifications may be made if necessary. The RCP does not add new government functions. Instead, it calls for greater collaboration and coordination between federal, state, and local jurisdictions, and infrastructure providers.
747	6/22/04	letter	Gary Pryor, County of San Diego	The RCP proposes to revise the criteria used for prioritizing funding for regional transportation projects in order to give the "highest priority to the implementation of smart growth." While certain monies should be used to provide incentives for smart growth, all regional transportation funding should not be allocated based upon achieving smart growth objectives. Encouraging smart growth should not be at the expense of providing congestion relief and operational improvements in deficient corridors.	SANDAG and County staff met on June 29, 2004 to resolve this issue. On July 2, 2004, the Regional Planning Committee approved changing the word "highest" to "higher" in the Urban Form chapter (as reflected on page 74 of the Final Draft RCP) and in other chapters where the concept appeared. SANDAG recognizes that several factors need consideration when making transportation funding allocation decisions (as listed in the criteria themes for revising transportation project evaluation criteria in the Transportation chapter on pages 96-98).
748	6/22/04	letter	Gary Pryor, County of San Diego	The RCP proposes to use smart growth criteria for prioritizing funding for regional transportation projects, but then defines smart growth in the Smart Growth Opportunity Area matrix in a manner that excludes some unincorporated communities that meet smart-growth criteria as defined by proposals endorsed by the Board of Supervisors for General Plan 2020 (GP2020). In addition, the SANDAG criteria fail to recognize jurisdictions accepting the region's projected growth or jurisdictions planning comprehensively for growth while preserving agriculture, open space, and sensitive habitats. We believe that SANDAG definitions will unfairly reward incorporated communities simply because they contain higher densities, rather than rewarding jurisdictions that create comprehensive smart-growth plans that are appropriate for their location and unique conditions.	SANDAG and County staff met on June 29, 2004 to resolve this issue. On July 2, 2004, the Regional Planning Committee approved modifying the "Rural Community" category in the smart growth matrix to better reflect the County's GP2020 community development concept (page 67 of the Final Draft RCP). (Other changes to the matrix also were made to the "Community Center" category and in the "Notes" section, as reflected on pages 67 and 68 of the Final Draft RCP.)

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

749	6/22/04	letter	Gary Pryor, County of San Diego	The RCP establishes a land use strategy and proposes to use prioritization/allocation of regional transportation monies to implement the strategy. The proposed prioritization and allocation of transportation monies, however, may conflict with achieving/implementing the goals, policies, objectives, implementation measures and proposed projects outlined in the RTP and CMP. The RCP should achieve conformity and balance with the RTP and CMP and not become the lead criteria upon which the other plans are made to conform.	The RCP, RTP, and CMP are interrelated, and will evolve together as each plan/program is updated over time. The RCP serves as the overall planning and policy framework for the region, and as such, would set the course for updates to the RTP and the CMP. The criteria themes included in the Transportation chapter for developing a revised set of transportation project evaluation criteria build upon many themes included in the current RTP, MOBILITY 2030, and do not wholly replace existing criteria. This point was clarified in the Transportation chapter (pages 96-98 in the Final Draft RCP).
750	6/22/04	letter	Gary Pryor, County of San Diego	The RCP should not attempt to reallocate existing city and county funds presently being used for our facilities and operations (e.g., gas taxes, transient occupancy taxes).	Funding actions included in the RCP are recommendations. The recommended actions would require further evaluation prior to implementation. For example, before a recommended funding action is pursued, considerations regarding timing, use of funds, duration, and other funding priorities would need to be addressed.
751	6/22/04	letter	Gary Pryor, County of San Diego	The RCP should be internally consistent. Policies such as reducing impact fees and reducing regulatory burdens must be harmonized with new impact fee proposals and new inter-jurisdictional review processes and heightened building code requirements.	See response to comment #750. Many of the recommendations for smart growth incentives, such as described in the comment, would require further evaluation prior to implementation. As SANDAG, local jurisdictions, and infrastructure providers pursue implementation, they will need to weigh various quality of life factors in their specific geographic areas. Some jurisdictions or areas may implement some recommended actions more aggressively than others, depending upon factors in their areas.
752	6/22/04	letter	Gary Pryor, County of San Diego	There needs to be a consolidated listing of the cost of implementing the RCP and the funding sources. New costs to taxpayers, businesses and local jurisdictions, and expanded SANDAG roles and costs, need to be itemized and addressed as a whole.	Detailed costs will be identified as SANDAG, local jurisdictions, and infrastructure providers begin to focus on and weigh priorities for implementing recommended RCP actions. The IRIS chapter of the RCP illustrates the magnitude of the costs associated with the different infrastructure areas. However, any detailed costs and funding sources would need to be identified with further analyses.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

753	6/22/04	letter	Gary Pryor, County of San Diego	<p>One overall comment is that the EIR on the RCP states that the purpose of the RCP is to increase the total population of the region by capturing growth that would otherwise go outside our region; yet the RCP does not even mention that objective. SANDAG needs to clarify its intent as to whether the RCP is intended to identify a preferred direction for this region's growth (RCP objective) or to capture more growth (EIR objective).</p>	<p>SANDAG staff has clarified that the intent of the RCP is to identify a preferred direction for the region's growth, rather than to capture a certain percentage of future growth within the region (page 4 of Final Draft RCP).</p>
754	6/22/04	letter	Gary Pryor, County of San Diego	<p>Content has been added in several places throughout the RCP suggesting that local jurisdictions "can promote development in smart growth opportunity areas by offering incentives such as priorities for infrastructure improvements, fee reductions, priority processing of development plans, fee reductions for zoning, subdivision and site plan applications; water and wastewater capital recovery fees, redevelopment ..." (page 33,63,64,317). There are obstacles, as follows:</p> <ul style="list-style-type: none"> • Infrastructure improvements are projected over long periods (five or more years) so changing priorities will not have an immediate impact; • Impact fees can only be reduced if there is (a) replacement funding to offset it or (b) demonstrated lower demand characteristics. Replacement impact fee funding has been used for low-cost housing with CDBG funds, for example. A reduction in transportation demand would have to be demonstrated to reduce traffic impact fees. It is unlikely that fee reductions would be defensible for parks, sewage, schools, etc. It is also unclear how this reduction in fees corresponds with the RCP directives to add various new fees. • Priority processing comes at the expense of other projects and delays other applicants. • Fee reductions for processing applications would require direct subsidy by all taxpayers in the region. Given today's severe budget constraints, where would the funds come from? • Water and wastewater recovery fees can only be reduced when there is decreased need for the revenue • Local redevelopment areas can only be utilized when blight exists. Expanded use of redevelopment by cities has an impact to the County's general fund. 	<p>SANDAG staff agrees that there are limitations to certain types of local incentives, and that incentives should be fully evaluated by local jurisdictions prior to being implemented. Additionally, in response to the first bullet point, the RCP acknowledges that infrastructure improvements are projected over long time periods, and as such, changing priorities will not have an immediate impact. Pages 289-290 in the IRIS states, "<i>It is unlikely that the IRIS approach, as discussed, will affect the current set of capital improvement programs, as these funds have already been allocated based on existing prioritized needs. It will likely take three to five years for the region to incorporate the incentive-based approach into the local planning process so that it coincides with new capital improvement budgets.</i>"</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

755	6/22/04	letter	Gary Pryor, County of San Diego	<p>Pages 31, 51, and 63 state that a concept map will be used as the foundation for showing eligible locations for smart growth incentive funds. There is no discussion as to how or why a concept map would be created. Meeting the criteria in the Smart Growth Area Classification Matrix is adequate for determining an areas' eligibility for smart growth incentive funds. Creating a concept map, independent of the RCP process, unnecessarily complicates that process and puts to question the legitimacy of the matrix.</p>	<p>The RCP does include discussion of how and why a concept map would be created. Overall, the concept map is viewed as a planning tool to communicate with local jurisdictions and infrastructure providers about where smart growth will happen. It will be used as a planning tool in updates to the RTP and other infrastructure systems, and may be used for programming smart growth incentive funds. The concept map will be updated over time. This overview has been added to the Planning and Policy Framework, Urban Form, and Implementation chapters. More specifically, Pages 31 and 60 explain that the concept map will be used as the foundation for showing eligible locations for smart growth incentive funds. It also will serve as the basis for establishing where SANDAG should make infrastructure investments and deploy transit services to support smart growth development. SANDAG will work with local jurisdictions to identify and map the areas, through ongoing coordination efforts as well as subregional planning studies.</p>
756	6/22/04	letter	Gary Pryor, County of San Diego	<p>Page 36 states that San Diego County Water Authority will not provide service beyond the CWA boundary, and that the County's General Plan will limit the extension of sewer services. This is an inaccurate statement and should read: "The San Diego County Water Authority has established a boundary around the urbanized area (See Figure 4A.1); residential densities beyond that will be substantially reduced under the proposed GP2020 update. Development outside this boundary is generally restricted by the limited supply of local water, though some development is planned beyond the boundary in the East Otay area."</p>	<p>This requested change has been made, as reflected on page 38 of the Final Draft RCP.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

757	6/22/04	letter	Gary Pryor, County of San Diego	Page 56 contains the Smart Growth Area Classification matrix. Because the matrix does not reflect the General Plan 2020 update in several important ways, it would render some communities ineligible for SGOA and other transportation funding that exhibit smart growth characteristics as defined by GP2020. For these reasons, County staff recommends specific text changes to the Rural Village category, sent to SANDAG staff on June 15, 2004, that address unique conditions within unincorporated communities and that are consistent with the smart-growth framework already endorsed by the Board of Supervisors for GP2020.	See response to comment #748.
758	6/22/04	letter	Gary Pryor, County of San Diego	Pages 59, 63, 92 and 270 direct that all transportation funds be used to encourage, promote and "give the highest priority to the implementation of smart growth in the establishment of criteria for the allocation of transportation funding. The highest priority should be the satisfaction of the transportation objective (congestion relief, safety, improved operations, etc.) The County still believes that not all transportation funds should be earmarked for smart growth areas but that meeting mobility needs is still essential to allow a flow of people and goods throughout the region.	See responses to comment #s 747 and 749. In addition, Policy Objective no. 7 on page 100 of the Transportation chapter clearly recognizes that not all transportation funds will be earmarked for smart growth areas: " <i>Give priority to serving regional roadway and transit investments in smart growth opportunity areas while recognizing the need for transportation improvements elsewhere in the region.</i> "
759	6/22/04	letter	Gary Pryor, County of San Diego	The need for community public parking projects is discussed. The provision of public parking in walkable communities should be encouraged and funding resources/strategies to construct community parking projects identified/developed. The availability of funding for public parking would aid in developing walkable communities in County town centers such as Alpine, Ramona, and Fallbrook.	Pages 50 and 71 in the Urban Form chapter reflect that the walkability of smart growth areas can be improved when parking is centralized in community parking structures, particularly as part of mixed use projects. It also states that structured public parking can require significant investments, and may not be an eligible cost under some transportation funding programs, but that SANDAG should investigate strategies to fund community parking projects.
760	6/22/04	letter	Gary Pryor, County of San Diego	Page 61, Transit Oriented Development Investment Program. This paragraph envisions a new government role and funding to fund site housing near transit stations. It sounds like a form of redevelopment but with a transit orientation. It must be noted that these programs should not be at the expense of the general taxpayers of the region (as are redevelopment projects which deplete the County General Fund tax base).	This paragraph (page 71 in the Final Draft RCP) is part of a section that describes a variety of potential smart growth incentive funding programs. Implementation of such programs is not intended to deplete the County General Fund tax base.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

761	6/22/04	letter	Gary Pryor, County of San Diego	The Congestion Management Program (CMP) is discussed on pages 78 and 79 of the RCP. The CMP deficient corridors are not identified in the RCP. Corridors requiring the preparation of deficiency plans are not specified in the RCP. It should be noted that many corridors are classified as deficient and numerous deficiency plans must be prepared. Implementation of smart growth policies alone will not alleviate/address the deficiencies in these corridors. Provisions should be made to prepare the needed deficiency plans and provide funding/resources to implement the measures needed to address the deficiencies.	Pages 88-89 provide a brief description of the CMP. CMP deficient corridors are identified in the CMP and the RTP. SANDAG's Fiscal Year 2005 Overall Work Program includes a work element to prepare CMP deficiency plans.
762	6/22/04	letter	Gary Pryor, County of San Diego	On page 85 it is noted that \$20 billion of the \$42 billion of the Reasonably Expected revenue financing option is for operations and maintenance. A very substantial portion of the operations and maintenance costs are for transit. While developer impact fees and other fee mechanisms are proposed, no strategies are included in the RCP to better finance the operating costs for transit.	It is not the role of the RCP to identify specific funding sources for transit operations and maintenance. MOBILITY 2030, the Regional Transportation Plan, contains financial strategies for its implementation.
763	6/22/04	letter	Gary Pryor, County of San Diego	Page 103 asserts that the region's homes and landscapes should be designed, constructed and operated to incorporate energy efficiency, water conservation, waste minimization, pollution prevention, resource-efficient materials, and indoor environmental quality as well as other "green building" techniques. This should be contrasted with the "burden reduction" statement on page 169 to implement changes to regulatory processes and fee structures to improve the business environment.	It is true that these efficiency/conservation features can add to the cost of housing. However, they can also reduce electricity, water, and other costs for homeowners, and can benefit the region as a whole by improving regional air and water quality and availability of water and energy resources. As local jurisdictions consider implementing recommended actions contained in the RCP, cost-effectiveness evaluation of such measures should be performed.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

764	6/22/04	letter	Gary Pryor, County of San Diego	<p>Page 109 and page 258 add a new policy to create a more "meaningful" regional housing allocation process and to "provide incentives for local jurisdictions to meet their housing needs." We are opposed to the addition of any new State mandates or penalties and want assurance that SANDAG staff will not be advocating new penalties for local jurisdictions. Also, the comment on page 259 to "enforce local state and federal housing laws and regulations" is unnecessary. If laws are not being enforced, there are means other than the RCP to redress those allegations.</p>	<p>The intent of this policy objective is to work with the state to improve the value and effectiveness of the law, not to pursue additional state mandates or penalties. The referenced Policy Objective, in its entirety, states, "<i>Increase the effectiveness of housing element law, creating a more meaningful regional housing allocation process.</i>" As stated on page 110, housing element law is often criticized as being too complicated (especially the regional housing needs assessment process), too focused on planning rather than production, and for lacking enforcement mechanisms, or "teeth" to ensure that the plans and programs included in the housing element are actually carried out. The action, "<i>Enforce local, state, and federal housing laws and regulations</i>" has been removed.</p>
765	6/22/04	letter	Gary Pryor, County of San Diego	<p>Page 110 adds an action program for SANDAG to continue participation in a State working group. This is an internal, annual budget issue and does not belong in the RCP.</p>	<p>SANDAG believes that it is appropriate to retain this action to reflect the importance of the region's representation in the housing element reform discussion.</p>
766	6/22/04	letter	Gary Pryor, County of San Diego	<p>Page 137, new program #6: "Develop a framework for assessing the effectiveness of jurisdictional storm water programs." This sounds like it's an attempt to have SANDAG oversee the efforts of the 19 jurisdictions. In light of budget constraints, it does not seem to be an appropriate priority to fund SANDAG staff to oversee programs being implemented by its member agencies. On the same page, the program "secure funding for watershed management efforts throughout the region," is this new funding for SANDAG or is this an attempt to fund the cities and county for work we are presently doing?</p>	<p>As reflected in the Strategic Initiatives in the Implementation chapter (section 4.1, page 349), SANDAG sees the County and the Regional Water Quality Control Board as the primary lead agencies for work related to water quality. As stated in the IRIS, new funding would likely be needed to finance efforts by state, regional, and local agencies to cooperatively develop a comprehensive and detailed master plan for storm water management in the region and an associated implementation plan, similar to regional programs for habitat conservation and shoreline sand replenishment.</p>
767	6/22/04	letter	Gary Pryor, County of San Diego	<p>Page 194 states that the planning and siting of elementary and secondary schools and community colleges is a local responsibility. It needs to be clarified that "local" does not mean local government. It is unclear why the financial aspects are included in the IRIS because that is a State/school district issue (as is siting).</p>	<p>SANDAG has changed the language in this section to: "<i>primarily a responsibility of local school districts.</i>" Page 285 of the IRIS lists the criteria that were used to select key infrastructure areas of study, and as part of the RCP development process, the SANDAG Board of Directors approved the specific areas to be evaluated.</p>

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

768	6/22/04	letter	Gary Pryor, County of San Diego	The reference on page 236 to "support economic development efforts of non-gaming tribes" is open-ended and could be construed to represent support of any land uses regardless of whether they constitute Smart Growth or are consistent with our road capacities. We don't give open-ended support for economic development enterprises of cities or the county; we should not treat the tribes differently in expecting appropriate uses of land consistent with regional goals.	On page 252 in the Borders chapter, the referenced sentence has been changed as follows: " <i>Those tribes without gaming still face these [economic] challenges, and will need to pursue economic development opportunities to improve the quality of life on their reservations.</i> "
769	6/22/04	letter	Gary Pryor, County of San Diego	Page 218, the policy to "form a working group" does not belong in the RCP. No Groups should be institutionalized through the RCP.	This language (page 232) has been changed to " <i>Improve communications among...</i> "
770	6/22/04	letter	Gary Pryor, County of San Diego	Page 277, the Regional Impact Fee is proposed "to implement the RCP." Is this implying that the fee would be used in Smart Growth areas only, and if so, how is there a nexus with new development in outlying areas?	As stated in the text on page 295, the regional transportation development impact fee would be " <i>used to implement the RTP,</i> " not the RCP. The RTP provides funding for regional transportation projects both within and outside of smart growth opportunity areas.
771	6/22/04	letter	Gary Pryor, County of San Diego	New impact fees are advocated for Transportation (page 277); solid waste infrastructure (page 278); beach sand replenishment (page 278); habitat conservation (page 279); storm water (page 280), along with gas tax increase and TransNet extension (page 280); and housing linkage fees. These added fees and local costs have not been put together in any single portion of this report. A fiscal and economic analysis is needed of the impacts of the RCP.	A fiscal and economic analysis is beyond the scope of the RCP. DIFs are not proposed for all infrastructure areas. Although DIFs are proposed for transportation and storm water needs, the solid waste section calls for a user fee for services provided in the City of San Diego (which currently does not charge a user fee); the beach sand replenishment section suggests revenues from the TOT; and the habitat conservation section proposes the establishment of a mitigation banking program.
772	6/22/04	letter	Gary Pryor, County of San Diego	The County objects to the attempted reprogramming of County Transient Occupancy Taxes to beach sand replenishment.	Comment noted. A sentence has been added on page 297 stating that any specific allocation of TOT funds to beach sand replenishment would have to be considered and evaluated by each jurisdiction responsible for allocating TOT funds.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

773	6/22/04	letter	Gary Pryor, County of San Diego	Page 285 states that from 2000 to 2010, most population growth will occur in the urban (incorporated) areas of the region. However, the report does not point out how the rate of growth in cities compares with the unincorporated areas, nor the percent of growth projected for unincorporated areas from 2020 to 2030. This comment implies that the cities are taking the brunt of the anticipated growth, whereas in fact, even with GP 2020, the unincorporated County will absorb a high proportion of the region's growth through the year 2020. Therefore, a significant investment is needed to create infrastructure in unincorporated areas to deal with the anticipated onslaught of new growth within the SANDAG 2030 planning period.	The maps on page 301 in the IRIS include pie charts showing the percent of population growth by incorporated and unincorporated area by decade. SANDAG also has added a table on page 303, which shows that the percent of growth in the unincorporated area will be 13%, 27%, and 31%, respectively, over the next three decades. The maps and the table were updated to reflect the Final 2030 Forecast (versus the Preliminary 2030 Forecast).
774	6/22/04	letter	Gary Pryor, County of San Diego	Matrix of timelines and responsibilities. As stated earlier, this overly ambitious work program needs to be tempered by budget realities and should be consistent with existing budgeted resources.	The Strategic Initiatives starting on page 342 are presented by fiscal year. SANDAG staff, in conjunction with local planning staffs and direction by the Regional Planning Committee, identified the Strategic Initiatives and the initial timeframes. As stated in the Implementation chapter, SANDAG will review the Strategic Initiatives on an annual basis in order to coordinate with both internal and external agency budgets and resources (pages 340 and 341).
775	6/22/04	letter	Gary Pryor, County of San Diego	Page 342, the County continues to object to new policies that "preserve agricultural land in buffers between urban land and habitat." Agricultural lands are working landscapes, and we cannot dictate that farmers not use their perimeters. Also, agricultural activity within the unincorporated County is a complex issue that is being addressed in GP2020 by reducing development potential within prime agricultural areas.	SANDAG has removed references to agricultural land serving as a buffer between urban land uses and habitat from the Healthy Environment chapter as well as from other places where this concept appeared.
776	7/14/04	letter	Barry Johnson, City of Solana Beach	Local land use control: The City of Solana Beach continues to strongly support local land use control. Our Council and the citizens they represent desire that our present authority and decision making abilities not be usurped. This is an important position shared by many cities in the region.	One of the key changes made to the draft RCP was articulating more clearly that local cities and the County have, and will continue to retain, local land use authority. The RCP is based on <i>incentives</i> and <i>collaboration</i> , rather than on regulation to achieve regional goals.

**Comments and Responses on Draft Regional Comprehensive Plan
July 2004**

777	7/14/04	letter	Barry Johnson, City of Solana Beach	<p>Regional impact fees: A comprehensive system of regional development impact fees including commercial and industrial users at a dollar amount consistent with a full cost recovery is needed. While some may argue this has been needed for several decades, we need to regionally establish a consistent funding mechanism to address regional issues.</p>	<p>The RCP acknowledges that there is growing concern in the region that development is not paying its "fair share" of the cost of constructing new regional transportation facilities. To address this concern, the RCP includes the following recommended action: <i>"Local jurisdictions, acting through SANDAG, should research benefits and costs of cooperatively adopting a regional traffic impact fee program to mitigate the effects of new development on the regional transportation system."</i> Under current law, SANDAG does not have the legal authority to assess a regional impact fee. As noted in the RCP, local jurisdictions would need to cooperate in the establishment, collection, and use of a regional impact fee.</p>
778	7/14/04	letter	Barry Johnson, City of Solana Beach	<p>Regional Transportation Plan (RTP) / Regional Comprehensive Plan (RCP) analysis: An analysis is recommended of what would happen if the RTP was implemented but the smart growth land use components of the RCP were not. Such an analysis would better quantify and more clearly present the implications of smart (or conversely, "dumb") growth.</p>	<p>The development of the current RTP, MOBILITY 2030, included an analysis of the effects of smart growth land use policies on the performance of the regional transportation system. The evaluation showed fairly small numeric differences in performance measures, such as average travel time. In general, however, the smart growth scenario performed better than other scenarios based on current plans and policies; it resulted in fewer interregional trips, shorter commute trips, and greater accessibility to and use of transit. While the analysis showed minimal numeric impacts on overall performance, the 2030 RTP recognized that developing more smart growth opportunity areas over time, as proposed in the RCP, is expected to improve future transportation system performance.</p> <p>SANDAG expects to conduct a similar analysis with the next RTP update, scheduled to begin this fiscal year. As part of this analysis, SANDAG would evaluate the effects of the RCP smart growth concepts on the performance of the regional transportation system.</p>