APPENDIX A

NOTICE OF PREPARATION (NOP)

Appendix A-1: 2050 RTP/SCS EIR NOP
Appendix A-2: NOP Comment Letters
Appendix A-3: Summary of NOP Comment Letters
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APPENDIX A-1

2050 RTP/SCS EIR NOP
April 19, 2010

TO: Interested Agencies, Organizations, and Individuals

FROM: SANDAG Staff

SUBJECT: Notice of Preparation of a Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan (RTP)

Notice of Preparation

SANDAG, as lead agency, will prepare a Programmatic Environmental Impact Report (EIR) for the 2050 RTP in accordance with the California Environmental Quality Act (CEQA). SANDAG needs to know your views, or the views of your organization or agency, as to the scope and content of the environmental information that will be addressed in the draft EIR. The project description, location, and probable environmental effects are contained in the attached material. An initial study was not prepared for this project.

Scoping Meetings

A series of public scoping meetings will be held throughout the region on the following dates:

North County Inland
April 26
4 to 7 p.m.
Escondido City Hall Mitchell Room
201 N. Broadway, Escondido,
CA 92025

South County
April 27
4 to 7 p.m.
Loma Verde Recreation Center
1420 Loma Lane, Chula Vista,
CA 91911

North County Coastal
April 28
4 to 7 p.m.
Tri-City Medical Center Wellness Center
6250 El Camino Real, Carlsbad,
CA 92009

Central
May 3
4 to 7 p.m.
Bayside Community Center
2202 Comstock Street, San Diego,
CA 92111

East County
May 6
4 to 7 p.m.
Ronald Reagan Community Center
195 East Douglas Avenue, El Cajon,
CA 92020
Public input will be taken at these meetings. In addition, public input can be provided in writing at the meetings or can be submitted to SANDAG. Contact information is provided below.

Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice.

**SANDAG Contact Information**

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

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

**Lead Agency:** San Diego Association of Governments (SANDAG)

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

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

**Date:** April 19, 2010

RRU/ais

Attachment: Project Description

Prepared By: [Signature]

Rob Rundle, Principal Regional Planner
Notice of Preparation – Programmatic Environmental Impact Report
Project Description and Scope of Environmental Analysis
2050 Regional Transportation Plan
April 19, 2010

Background and Overview

SANDAG is the lead agency and will prepare a Programmatic Environmental Impact Report (EIR) for the 2050 Regional Transportation Plan (RTP). The EIR will be prepared pursuant to the California Environmental Quality Act (CEQA). The 2050 RTP will rely upon the Regional Comprehensive Plan (RCP) and other planning efforts as the foundation for integrating land uses, transportation systems, infrastructure needs, and public investment strategies within a regional smart growth framework.

With each RTP update, SANDAG starts the planning process by establishing a framework of goals, policy objectives, and performance measures to guide the development of the Plan. This is a key first step, as it is the policy foundation for the RTP and identifies the “big picture” of what the region hopes to achieve.

The 2050 RTP goals are structured into two overarching themes: Quality of Travel & Livability, and Sustainability. Quality of Travel & Livability relates to how the transportation system functions from the individual customer perspective (Mobility, Reliability, and System Preservation & Safety), while Sustainability relates to making progress simultaneously in each of the Three “Es” (Social Equity, Healthy Environment, and Prosperous Economy) from a regional perspective.

Project Location

The RTP focuses both on the movement of people and goods within the San Diego region, including marine terminals, air cargo facilities, freight rail, and land ports of entry that link our region with Mexico. This geographic extent includes the cities of Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, El Cajon, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and the unincorporated County of San Diego.

Senate Bill (SB) 375

SANDAG is the first major Metropolitan Planning Organization preparing an RTP that will comply with provisions of SB 375. A new regional growth forecast and the results of other studies currently underway will be used in the development of the 2050 RTP, including the Climate Action Strategy, Regional Energy Strategy, Regional Bicycle Plan, Urban Area Transit Strategy, Comprehensive Freight Gateway Forecast, airport multimodal planning, high speed rail planning, and corridor and subregional studies.

Pursuant to SB 375, the Sustainable Communities Strategy (SCS) is a new element of the RTP, and will be designed to achieve, to the extent feasible, regional greenhouse gas (GHG) emission targets through development patterns, infrastructure investments, and transportation measures or policies. Additionally, the SCS will identify areas sufficient to
house an eight-year projection of the regional housing needs and address protection of sensitive resource areas. If the SCS is unable to achieve the GHG emission targets, an Alternative Planning Strategy (APS) must be developed to demonstrate how the targets could be achieved.

The EIR for the 2050 RTP will require analysis beyond what has been included in previous RTP EIRs. The RTP environmental analysis will include GHG emissions baseline measurements and projections, as well as potential mitigation measures to reduce those emissions. The EIR also will include analysis of the environmental effects of the SCS.

In accordance with state and federal guidelines, the RTP is updated every four years. The last comprehensive EIR on the RTP was conducted in 2007 for the 2030 RTP. A new EIR for the 2050 RTP is necessary to adequately evaluate potentially significant environmental effects of the plan and to indicate the manner in which such significant effects can be reduced, avoided, or mitigated. The 2050 RTP is scheduled for adoption by the Board of Directors in July 2011.

This Notice of Preparation (NOP) is intended to alert regulatory and trustee agencies, interested agencies, organizations, and individuals of the preparation of the 2050 RTP EIR. Comments regarding the scope of the EIR received during the 30-day NOP review period will be incorporated, as appropriate, in the environmental document.

**Issues Addressed in the EIR**

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

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

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

SANDAG will evaluate several alternatives to the project in the EIR. Each alternative will be compared to the proposed project for its potential to achieve the goals of the 2050 RTP while reducing the significant regional environmental impacts. In addition to the project, which will assume a transportation network and transportation policies that are developed from the Revenue Constrained Scenario, it is proposed that the EIR will include the evaluation of the four alternatives described below.

1. No Project Alternative – The No Project Alternative is required by CEQA. For this EIR, the No Project Alternative is defined as a transportation network that includes those projects that have already received funding, are scheduled for funding, and/or have received environmental clearance.

2. Intensified Land Use Distribution Alternative – The Intensified Land Use Distribution Alternative will analyze a land use pattern that further concentrates population and employment densities along existing and planned transportation corridors.

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

4. Transportation Demand Management/System Management Alternative – The Transportation Demand Management/System Management Alternative will evaluate the additional transportation demand management measures and additional transportation system management measures that could be implemented in the region to reduce environmental impacts associated with the 2050 RTP.

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

NOP COMMENT LETTERS
Re: Notice of Preparation for the 2050 RTP

Dear Mr. Rundle,

The above referenced Notice of Preparation (NOP) was received by this office on April 19, 2010. We appreciate the opportunity to comment on the environmental review process related to the 2050 RTP for the San Diego region. We offer these comments as general direction relative to the policies of the Coastal Act that should be incorporated into the environmental review of any development slated within the RTP that would either directly or indirectly affect the resources of the California Coastal Zone.

The presented goals of the 2050 RTP, to improve “Quality of Travel and Livability, and Sustainability” create an opportunity to enhance San Diego’s established transportation system in a manner that is supportive of many tenants of the Coastal Act. These stated goals, which are inclusive of a Sustainable Communities Strategy pursuant to the requirements of SB 375, afford the possibility to address both local and regional efforts to address likely climate change scenarios.

The development of smart growth solutions to future transportation and land use challenges is strongly supported through Coastal Act policies. Public Resources Code (PRC) 30250 requires that new development shall be located within or directly adjacent to existing developed areas having adequate public services able to accommodate the new development and that the new development will neither individually or cumulatively impact coastal resources. Public transit development that facilitates improved public coastal access is encouraged (PRC 30252), and further restrictions are placed on new development that require projects minimize energy consumption and vehicle miles travelled. These policies can be implemented through the concentration of development densities along existing transportation corridors and employment centers, and improving the connectivity for various types of transit linkages available within these areas. Additionally, concentrating development into existing areas can serve to preserve existing coastal agricultural resources (PRC 30241 and 30242) and reduce carbon emissions associated with the import of these locally produced goods. The reduction of GHG emissions through adherence to the direction from SB 375 can further assist in achieving these stated goals, while maintaining compliance with Coastal Act policies.

The transportation corridors located within the San Diego region bisect or are located directly adjacent to sensitive marine resources including coastal lagoon systems and the Pacific Ocean itself. Impacts to these resources are restricted by Coastal Act policies. Except for certain specific instances, fill of a wetland or other coastal waters is prohibited (PRC 30233), and the marine resources (PRC 30230), water quality (PRC 30231) and environmentally sensitive habitat
areas (PRC 30240) often associated with the coastal environment are also protected. Many of these coastal systems have already significantly deteriorated due to historical transportation infrastructure development. Future transportation improvements planned for the Coastal Zone should seek to ameliorate and improve these constraints whenever feasible.

The proximity of several transportation corridors to the coastal environment also leave them highly susceptible to impacts associated with future sea level rise. This provides additional incentive to reduce GHG emissions, in order to not further exacerbate hazards associated with accelerated climate change. Future transportation improvements should be designed to account for predicted sea level rise extending to at least 2100, or beyond if the design life of the project extends into the next century. Additionally, it will be important to inventory existing transportation infrastructure in order to prepare for sea level rise and to develop appropriate adaptation strategies to address these potential impacts.

As directed through AB 1396, the 2050 RTP should provide an opportunity to assess the California Coastal Trail (CCT) within the San Diego region in order to identify existing gaps and other related coastal access needs. The CCT provides valuable linkages between coastal areas for both pedestrian and bicycle transportation. Trail systems provide valuable alternate transportation linkages that serve to further enhance connectivity and create a more robust and functional transportation plan.

We look forward to future collaboration on improvements to the transportation system of the San Diego region and are available to address any question or concerns you may have.

Sincerely,

Gabriel Buhr
Coastal Program Analyst III
San Diego District
May 17, 2010

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

Subject: Comments on the Notice of Preparation of a Draft Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan (SCH# 2010041061)

Dear Mr. Rundle:

The California Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Programmatic Environmental Impact Report (DPEIR) for the proposed 2050 Regional Transportation Plan, and offers the following comments and recommendations. The following comments have been prepared pursuant to the Department’s authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines Section 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines Section 15361 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) and Fish and Game Code Section 1600 et seq. The Department also administers the Natural Community Conservation Planning Program (NCCP). The NOP for the project identifies that the project is located within planning areas for a number of NCCP plans in San Diego County (County), including the Multiple Species Conservation Program and the Multiple Habitat Conservation Program.

The 2050 Regional Transportation Plan (RTP) is an update of the 2030 RTP produced in 2007. The RTP addresses both the movement of goods and people within the San Diego region, and includes roads, bike paths, marine terminals, air cargo facilities, freight rail, and land ports of entry that link the San Diego region with Mexico. The RTP is based upon other forecasts and plans, such as a new Regional Growth Forecast, Climate Action Strategy, Regional Energy Strategy, Regional Bicycle Plan, Urban Area Transit Strategy, Comprehensive Freight Gateway Forecast, airport multimodal planning, high speed rail planning, and corridor and sub-regional studies. A new element to the 2050 RTP is the Sustainable Communities Strategy (SCS) which will address goals for regional greenhouse gas emissions. This is a requirement established by State Senate Bill 375. The 2050 RTP will have two overarching themes: Quality of Travel & Livability, and Sustainability. Under the theme of Sustainability is included the topic of a Healthy Environment, which will address the issues of open space and sensitive biological resources.

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

Specific Comments

1. The Sustainable Communities Strategy should include an analysis of how the RTP is consistent with approved NCCP plans such as the Multiple Species Conservation Plan (MSCP) and the Multiple Habitat Conservation Plan (MHCP). In addition, a number of...
NCCP plans in the County are far along in the planning process and will likely be approved and begin implementation within the next year or two. In the SANDAG document "2050 Regional Transportation Plan: Work Program and Schedule", page 2: Sustainable Communities Strategy (SCS), it indicates that the SCS element of the RTP must be consistent with California Air Resources Board greenhouse gas emission reduction targets, and the Regional Housing Needs Assessment. This section of the RTP should also specifically call out the need to be consistent with the regional NCCP habitat conservation plans as well.

2. The Department requests that in any analyses of open space lands in the RTP that natural open space be considered as public infrastructure as necessary as transportation, water, and developable lands. These open space lands provide critical functions for the human population (e.g., water quality, recreation, aesthetics, land values, etc.) as well as the plants and wildlife of the region. Open space lands should not be considered expendable or of lesser value than transportation corridors. In addition, many of the open space lands in the County are set aside specifically to protect sensitive habitats and endangered/threatened species. State and Federal endangered/threatened species Incidental Take Permits issued to a number of local jurisdictions and agencies in the County are contingent upon those conserved lands not being impacted. The 2050 RTP should not threaten the viability of those State and Federal permits, and the DPEIR should discuss and demonstrate the compatibility of the 2050 RTP with the conditions of those permits and regional conservation plans.

3. The RTP should include specific standards and/or goals for future projects that it proposes that could directly or indirectly impact sensitive biological resources. Such standards should address the issue of avoidance of impacts altogether where feasible, appropriate locations and sizes of wildlife under-crossings of roadways, placement of wildlife under-crossings along roads designated for expansion or widening to compensate for poor road design in the past, minimum habitat buffers for wetland/riparian habitats, minimum buffers for noise and lighting impacts to adjacent open space lands, erosion control measures, landscaping standards that exclude invasive non-native plant species, fuels management, maintenance or improvement of existing hydrology, and water quality control mechanisms. By setting out clear standards for future transportation projects in the DPEIR and RTP, these can be integrated into any future project at the beginning of the project design process, and not at the end where it becomes more problematic.

4. The DPEIR should clarify how the 2050 RTP relates to local jurisdictional authority on land use issues. If there is a conflict between a RTP project and a local jurisdiction's goals or previous commitments for land conservation how is that conflict resolved? Does the RTP over-ride local jurisdiction authority? If so, this could clearly jeopardize the viability of regional conservation plans, and this should also be discussed in the DPEIR.

5. The DPEIR should include an Environmentally Superior Alternative which minimizes the direct, indirect and cumulative impacts to sensitive biological resources in the region.

6. As part of the RTP, SANDAG/Caltrans should focus on the early acquisition of biological mitigation sites within the County to compensate for future project impacts. Large consolidated mitigation/conservation banks will streamline the project permitting process and provide more biologically sustainable mitigation sites. These mitigation sites should support the preserve-building efforts of the regional habitat conservation plans within the County. The securing of large multi-project biological mitigation sites should be one of the
goals of the RTP under the Healthy Environment Strategy portion of the Sustainable Communities Strategy element.

7. The NOP is unclear as to what existing transportation-related facilities, if any, would be expanded. Are any regional airports that handle cargo being proposed for expansion? The Department would be particularly concerned if certain smaller airports are expanded into native habitats due to the sensitive resources surrounding these facilities. Brown Field in San Diego, McClellan Palomar Airport in Carlsbad, and Ramona Airport in the County of San Diego are all airports with adjacent sensitive resources issues.

8. If the 2050 RTP has the potential to compromise one or more NCCP plans in the County, then the DPEIR should include an economic impact analysis of the costs to development in the region from the potential loss of endangered/threatened species incidental take permits through the NCCP.

General Comments

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

a) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DPEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department. ¹ Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

b) The Department also has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA or SAA) Agreement is required. The Department's issuance of a LSA or SAA for a project that is subject to CEQA will require CEQA

compliance actions by the Department as a responsible agency. The Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA or SAA.  

2. A California Endangered Species Act (CESA) incidental take permit is required if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:

a) Biological mitigation monitoring and reporting proposals of sufficient detail and resolution to satisfy the requirements of CESA.

b) Department-approved Mitigation and Monitoring Plan for plants listed as rare under the Native Plant Protection Act.

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

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

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

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

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete flora and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The DPEIR should include the following information.

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2 A notification package for a SAA may be obtained by accessing the Department's web site at www.dfg.ca.gov/1600.
a) CEQA Guidelines, §15125(c), direct that knowledge of the regional setting is critical to an assessment of environmental impacts, and that special emphasis should be placed on resources that are rare or unique to the region.

b) A map showing potential wildlife corridors through and/or adjacent to the subject property and the associated wildlife utilizing these areas.

c) A thorough assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities (Attachment 1, December 1983, revised May 2000).

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

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

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

5. The DPEIR should provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.

a) A discussion of impacts associated with increased lighting, noise, human activity, changes in drainage patterns, changes in water volume, velocity, and quality, soil erosion, and/or sedimentation in streams and water courses on or near the project site, with mitigation measures proposed to alleviate such impacts should be included.

b) Project impacts should be analyzed relative to their indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion should be provided of the potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of...
runoff from the project site. The discussions should also address the proximity of the extraction activities (i.e., existing mining and extraction operations that are currently in operation) to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater.

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

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

Mitigation for the Project-related Biological Impacts

6. The DPEIR should include measures to fully avoid and otherwise protect Rare Natural Communities (Attachment 2) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

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

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

9. In order to avoid impacts to nesting birds, the DPEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from March 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season, a qualified biologist should conduct a survey for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer shall be a minimum width of 300 feet (500 feet for raptors), shall be delineated by temporary fencing, and shall remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project.
10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

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

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to David Lawhead at (858) 627-3997.

Sincerely,

Edmund Pert
Regional Manager
South Coast Region

Attachment(s)

- Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities
- Sensitivity of Top Priority Rare Natural Communities in Southern California

cc: State Clearinghouse, Sacramento
    David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad
    David Lawhead, CDFG - San Diego
Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities

State of California
CALIFORNIA NATURAL RESOURCES AGENCY
Department of Fish and Game
November 24, 2009

INTRODUCTION AND PURPOSE

The conservation of special status native plants and their habitats, as well as natural communities, is integral to maintaining biological diversity. The purpose of these protocols is to facilitate a consistent and systematic approach to the survey and assessment of special status native plants and natural communities so that reliable information is produced and the potential of locating a special status plant species or natural community is maximized. They may also help those who prepare and review environmental documents determine when a botanical survey is needed, how field surveys may be conducted, what information to include in a survey report, and what qualifications to consider for surveyors. The protocols may help avoid delays caused when inadequate biological information is provided during the environmental review process; assist lead, trustee and responsible reviewing agencies to make an informed decision regarding the direct, indirect, and cumulative effects of a proposed development, activity, or action on special status native plants and natural communities; meet California Environmental Quality Act (CEQA) requirements for adequate disclosure of potential impacts; and conserve public trust resources.

DEPARTMENT OF FISH AND GAME TRUSTEE AND RESPONSIBLE AGENCY MISSION

The mission of the Department of Fish and Game (DFG) is to manage California's diverse wildlife and native plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. DFG has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations (Fish and Game Code §1802). DFG, as trustee agency under CEQA §15386, provides expertise in reviewing and commenting on environmental documents and makes protocols regarding potential negative impacts to those resources held in trust for the people of California.

Certain species are in danger of extinction because their habitats have been severely reduced in acreage, are threatened with destruction or adverse modification, or because of a combination of these and other factors. The California Endangered Species Act (CESA) provides additional protections for such species, including take prohibitions (Fish and Game Code §2050 et seq.). As a responsible agency, DFG has the authority to issue permits for the take of species listed under CESA if the take is incidental to an otherwise lawful activity; DFG has determined that the impacts of the take have been minimized and fully mitigated; and, the take would not jeopardize the continued existence of the species (Fish and Game Code §2081). Surveys are one of the preliminary steps to detect a listed or special status plant species or natural community that may be impacted significantly by a project.

DEFINITIONS

Botanical surveys provide information used to determine the potential environmental effects of proposed projects on all special status plants and natural communities as required by law (i.e., CEQA, CESA, and Federal Endangered Species Act (ESA)). Some key terms in this document appear in bold font for assistance in use of the document.

For the purposes of this document, special status plants include all plant species that meet one or more of the following criteria:

1. This document replaces the DFG document entitled "Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened and Endangered Plants and Natural Communities."

Survey Protocols Page 1 of 7
• Listed or proposed for listing as threatened or endangered under ESA or candidates for possible future listing as threatened or endangered under the ESA (50 CFR §17.12).

• Listed4 or candidates for listing by the State of California as threatened or endangered under CESA (Fish and Game Code §2050 et seq.). A species, subspecies, or variety of plant is endangered when the prospects of its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, disease, or other factors (Fish and Game Code §2082). A plant is threatened when it is likely to become endangered in the foreseeable future in the absence of special protection and management measures (Fish and Game Code §2087).

• Listed as rare under the California Native Plant Protection Act (Fish and Game Code §1900 et seq.). A plant is rare when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens (Fish and Game Code §1901).

• Meet the definition of rare or endangered under CEQA §15380(b) and (d). Species that may meet the definition of rare or endangered include the following:
  • Species considered by the California Native Plant Society (CNPS) to be “rare, threatened or endangered in California” (Lists 1A, 1B and 2);
  • Species that may warrant consideration on the basis of local significance or recent biological information5;
  • Some species included on the California Natural Diversity Database’s (CNDDB) Special Plants, Bryophytes, and Lichens List (California Department of Fish and Game 2008)6.

• Considered a locally significant species, that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA §15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G). Examples include a species at the outer limits of its known range or a species occurring on an uncommon soil type.

Special status natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status species or their habitat. The most current version of the Department’s List of California Terrestrial Natural Communities7 indicates which natural communities are of special status given the current state of the California classification.

Most types of wetlands and riparian communities are considered special status natural communities due to their limited distribution in California. These natural communities often contain special status plants such as those described above. These protocols may be used in conjunction with protocols formulated by other agencies, for example, those developed by the U.S. Army Corps of Engineers to delineate jurisdictional wetlands8 or by the U.S. Fish and Wildlife Service to survey for the presence of special status plants9.

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4 Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.

5 In general, CNPS List 3 plants (plants about which more information is needed) and List 4 plants (plants of limited distribution) may not warrant consideration under CEQA §15380. These plants may be included on special status plant lists such as those developed by counties where they would be addressed under CEQA §15380. List 3 plants may be analyzed under CEQA §15380 if sufficient information is available to assess potential impacts to such plants. Factors such as regional rarity vs. statewide rarity should be considered in determining whether cumulative impacts to a List 4 plant are significant even if individual project impacts are not. List 3 and 4 plants are also included in the California Natural Diversity Database’s (CNDDB) Special Plants, Bryophytes, and Lichens List. [Refer to the current online published list available at: http://www.dfg.ca.gov/biogeodata.] Data on Lists 3 and 4 plants should be submitted to CNDDB. Such data aids in determining or revising priority ranking.

6 Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.

7 http://www.dfg.ca.gov/biogeodata/wetcom/pl关/halcomlist.pdf. The rare natural communities are asterisked on this list.

8 http://www.wetlands.ca.gov/regs/lpge02a.htm

BOTANICAL SURVEYS

Conduct botanical surveys prior to the commencement of any activities that may modify vegetation, such as clearing, mowing, or ground-breaking activities. It is appropriate to conduct a botanical survey when:

- Natural (or naturalized) vegetation occurs on the site, and it is unknown if special status plant species or natural communities occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
- Special status plants or natural communities have historically been identified on the project site; or
- Special status plants or natural communities occur on sites with similar physical and biological properties as the project site.

SURVEY OBJECTIVES

Conduct field surveys in a manner which maximizes the likelihood of locating special status plant species or special status natural communities that may be present. Surveys should be floristic in nature, meaning that every plant taxon that occurs on site is identified to the taxonomic level necessary to determine rarity and listing status. "Focused surveys" that are limited to habitats known to support special status species or are restricted to lists of likely potential species are not considered floristic in nature and are not adequate to identify all plant taxa on site to the level necessary to determine rarity and listing status. Include a list of plants and natural communities detected on the site for each botanical survey conducted. More than one field visit may be necessary to adequately capture the floristic diversity of a site. An indication of the prevalence (estimated total numbers, percent cover, density, etc.) of the species and communities on the site is also useful to assess the significance of a particular population.

SURVEY PREPARATION

Before field surveys are conducted, compile relevant botanical information in the general project area to provide a regional context for the investigators. Consult the CNDDB\(^{10}\) and BIOS\(^{11}\) for known occurrences of special status plants and natural communities in the project area prior to field surveys. Generally, identify vegetation and habitat types potentially occurring in the project area based on biological and physical properties of the site and surrounding ecoregion\(^{12}\), unless a larger assessment area is appropriate. Then, develop a list of special status plants with the potential to occur within these vegetation types. This list can serve as a tool for the investigators and facilitate the use of reference sites; however, special status plants on site might not be limited to those on the list. Field surveys and subsequent reporting should be comprehensive and floristic in nature and not restricted to or focused only on this list. Include in the survey report the list of potential special status species and natural communities, and the list of references used to compile the background botanical information for the site.

SURVEY EXTENT

Surveys should be comprehensive over the entire site, including areas that will be directly or indirectly impacted by the project. Adjoining properties should also be surveyed where direct or indirect project effects, such as those from fuel modification or herbicide application, could potentially extend offsite. Pre-project surveys restricted to known CNDDB rare plant locations may not identify all special status plants and communities present and do not provide a sufficient level of information to determine potential impacts.

FIELD SURVEY METHOD

Conduct surveys using systematic field techniques in all habitats of the site to ensure thorough coverage of potential impact areas. The level of effort required per given area and habitat is dependent upon the vegetation and its overall diversity and structural complexity, which determines the distance at which plants can be identified. Conduct surveys by walking over the entire site to ensure thorough coverage, noting all plant taxa.

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\(^{10}\) Available at [http://www.cdf.ca.gov/biogendas/cnddb](http://www.cdf.ca.gov/biogendas/cnddb)

\(^{11}\) [http://www.bios.cdf.ca.gov/](http://www.bios.cdf.ca.gov/)

observed. The level of effort should be sufficient to provide comprehensive reporting. For example, one person-hour per eight acres per survey date is needed for a comprehensive field survey in grassland with medium diversity and moderate terrain, with additional time allocated for species identification.

TIMING AND NUMBER OF VISITS

Conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting. Space visits throughout the growing season to accurately determine what plants exist on site. Many times this may involve multiple visits to the same site (e.g. in early, mid, and late-season for flowering plants) to capture the floristic diversity at a level necessary to determine if special status plants are present. The timing and number of visits are determined by geographic location, the natural communities present, and the weather patterns of the year(s) in which the surveys are conducted.

REFERENCE SITES

When special status plants are known to occur in the type(s) of habitat present in the project area, observe reference sites (nearby accessible occurrences of the plants) to determine whether those species are identifiable at the time of the survey and to obtain a visual image of the target species, associated habitat, and associated natural community.

USE OF EXISTING SURVEYS

For some sites, floristic inventories or special status plant surveys may already exist. Additional surveys may be necessary for the following reasons:

- Surveys are not current;
- Surveys were conducted in natural systems that commonly experience year to year fluctuations such as periods of drought or flooding (e.g. vernal pool habitats or riverine systems);
- Surveys are not comprehensive in nature; or fire history, land use, physical conditions of the site, or climatic conditions have changed since the last survey was conducted;
- Surveys were conducted in natural systems where special status plants may not be observed if an annual above ground phase is not visible (e.g. flowers from a bulb);
- Changes in vegetation or species distribution may have occurred since the last survey was conducted, due to habitat alteration, fluctuations in species abundance and/or seed bank dynamics.

NEGATIVE SURVEYS

Adverse conditions may prevent investigators from determining the presence of, or accurately identifying, some species in potential habitat of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any given year. Discuss such conditions in the report.

The failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present. For example, surveys over a number of years may be necessary if the species is an annual plant having a persistent, long-lived seed bank and is known not to germinate every year. Visits to the site in more

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16 Habitats, such as grasslands or desert plant communities that have annual and short-lived perennial plants as major floristic components may require yearly surveys to accurately document baseline conditions for purposes of impact assessment. In forested areas, however, surveys at intervals of five years may adequately represent current conditions. For forested areas, refer to "Guidelines for Conservation of Sensitive Plant Resources Within the Timber Harvest Review Process and During Timber Harvesting Operations", available at https://r1.ofa.ca.gov/portal/Portals/12/TnPBotanicalGuidelinesJuly2005.pdf
than one year increase the likelihood of detection of a special status plant especially if conditions change. To further substantiate negative findings for a known occurrence, a visit to a nearby reference site may ensure that the timing of the survey was appropriate.

REPORTING AND DATA COLLECTION

Adequate information about special status plants and natural communities present in a project area will enable reviewing agencies and the public to effectively assess potential impacts to special status plants or natural communities and will guide the development of minimization and mitigation measures. The next section describes necessary information to assess impacts. For comprehensive, systematic surveys where no special status species or natural communities were found, reporting and data collection responsibilities for investigators remain as described below, excluding specific occurrence information.

SPECIAL STATUS PLANT OR NATURAL COMMUNITY OBSERVATIONS

Record the following information for locations of each special status plant or natural community detected during a field survey of a project site.

- A detailed map (1:24,000 or larger) showing locations and boundaries of each special status species occurrence or natural community found as related to the proposed project. Mark occurrences and boundaries as accurately as possible. Locations documented by use of global positioning system (GPS) coordinates must include the datum in which they were collected;
- The site-specific characteristics of occurrences, such as associated species, habitat and microhabitat, structure of vegetation, topographic features, soil type, texture, and soil parent material. If the species is associated with a wetland, provide a description of the direction of flow and integrity of surface or subsurface hydrology and adjacent off-site hydrological influences as appropriate;
- The number of individuals in each special status plant population as counted (if population is small) or estimated (if population is large);
- If applicable, information about the percentage of individuals in each life stage such as seedlings vs. reproductive individuals;
- The number of individuals of the species per unit area, identifying areas of relatively high, medium and low density of the species over the project site; and
- Digital images of the target species and representative habitats to support information and descriptions.

FIELD SURVEY FORMS

When a special status plant or natural community is located, complete and submit to the CNDDB a California Native Species (or Community) Field Survey Form or equivalent written report, accompanied by a copy of the relevant portion of a 7.5 minute topographic map with the occurrence mapped. Present locations documented by use of GPS coordinates in map and digital form. Data submitted in digital form must include the datum in which it was collected. If a potentially undescribed special status natural community is found on the site, document it with a Rapid Assessment or Relevé form and submit it with the CNDDB form.

VOUCHER COLLECTION

Voucher specimens provide verifiable documentation of species presence and identification as well as a public record of conditions. This information is vital to all conservation efforts. Collection of voucher specimens should

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16 NAD83, NAD27 or WGS84
17 http://www.dfg.ca.gov/biogeodata
18 NAD83, NAD27 or WGS84
19 http://www.dfg.ca.gov/biogeodata/vegcamp/veg_publications_protocols.asp
be conducted in a manner that is consistent with conservation ethics, and is in accordance with applicable state and federal permit requirements (e.g. incidental take permit, scientific collection permit). Voucher collections of special status species (or suspected special status species) should be made only when such actions would not jeopardize the continued existence of the population or species.

Deposit voucher specimens with an indexed regional herbarium no later than 60 days after the collections have been made. Digital imagery can be used to supplement plant identification and document habitat. Record all relevant permittee names and permit numbers on specimen labels. A collecting permit is required prior to the collection of State-listed plant species.

BOTANICAL SURVEY REPORTS

Include reports of botanical field surveys containing the following information with project environmental documents:

- **Project and site description**
  - A description of the proposed project;
  - A detailed map of the project location and study area that identifies topographic and landscape features and includes a north arrow and bar scale; and,
  - A written description of the biological setting, including vegetation and structure of the vegetation; geological and hydrological characteristics; and land use or management history.

- **Detailed description of survey methodology and results**
  - Dates of field surveys (indicating which areas were surveyed on which dates), name of field investigator(s), and total person-hours spent on field surveys;
  - A discussion of how the timing of the surveys affects the comprehensiveness of the survey;
  - A list of potential special status species or natural communities;
  - A description of the area surveyed relative to the project area;
  - References cited, persons contacted, and herbaria visited;
  - Description of reference site(s), if visited, and phenological development of special status plant(s);
  - A list of all taxa occurring on the project site. Identify plants to the taxonomic level necessary to determine whether or not they are a special status species;
  - Any use of existing surveys and a discussion of applicability to this project;
  - A discussion of the potential for a false negative survey;
  - Provide detailed data and maps for all special plants detected. Information specified above under the headings "Special Status Plant or Natural Community Observations," and "Field Survey Forms," should be provided for locations of each special status plant detected;
  - Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms should be sent to the CNDDB and included in the environmental document as an Appendix. It is not necessary to submit entire environmental documents to the CNDDB; and,
  - The location of voucher specimens, if collected.


Refer to current online published lists available at: http://www.dfg.ca.gov/biodatadiv.

A vegetation map that uses the National Vegetation Classification System (http://biology.usgs.gov/npvrf/npvrs.html), for example A Manual of California Vegetation, and highlights any special status natural communities. If another vegetation classification system is used, the report should reference the system, provide the reason for its use, and provide a crosswalk to the National Vegetation Classification System.

Survey Protocols
Page 6 of 7
• Assessment of potential impacts
  • A discussion of the significance of special status plant populations in the project area considering nearby populations and total species distribution;
  • A discussion of the significance of special status natural communities in the project area considering nearby occurrences and natural community distribution;
  • A discussion of direct, indirect, and cumulative impacts to the plants and natural communities;
  • A discussion of threats, including those from invasive species, to the plants and natural communities;
  • A discussion of the degree of impact, if any, of the proposed project on unoccupied, potential habitat of the species;
  • A discussion of the immediacy of potential impacts; and,
  • Recommended measures to avoid, minimize, or mitigate impacts.

QUALIFICATIONS
Botanical consultants should possess the following qualifications:
• Knowledge of plant taxonomy and natural community ecology;
• Familiarity with the plants of the area, including special status species;
• Familiarity with natural communities of the area, including special status natural communities;
• Experience conducting floristic field surveys or experience with floristic surveys conducted under the direction of an experienced surveyor;
• Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
• Experience with analyzing impacts of development on native plant species and natural communities.

SUGGESTED REFERENCES
California Natural Diversity Database. Most recent version. Special vascular plants, bryophytes and lichens list. Updated quarterly. Available at www.dfg.ca.gov.
**Sensitivity of Top Priority Rare Natural Communities in Southern California**

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

- **S1.1** Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.
- **S2.1** Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.
- **S3.1** Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

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

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

**Sensitivity Rankings (February 1992)**

<table>
<thead>
<tr>
<th>Rank</th>
<th>Community Name</th>
</tr>
</thead>
</table>
| S1.1 | Mojave Riparian Forest  
Sonoran Cottonwood Willow Riparian  
Mesquite Bosque  
Elephant Tree Woodland  
Crucifixion Thorn Woodland  
Althorn Woodland  
Arizonan Woodland  
Southern California Walnut Forest  
Mainland Cherry Forest  
Southern Bishop Pines Forest  
Torrey Pine Forest  
Desert Mountain White Fir Forest  
Southern Dune Scrub  
Southern Coastal Bluff Scrub  
Maritime Succulent Scrub  
Riversidean Alluvial Fan Sage Scrub  
Southern Maritime Chaparral  
Valley Needlegrass Grassland  
Great Basin Grassland  
Mojave Desert Grassland  
Pebble Plains  
Southern Sedge Bog  
Cismontane Alkali Marsh |
| S2.1 |  
S2.2 |  
S3.3 |  |
S1.2 Southern Foredunes
Mono Pumice Flat
Southern Interior Basalt Flow Vernal Pool

S2.1 Venticula Coastal Sage Scrub
Diegan Coastal Sage Scrub
Riversidean Upland Coastal Sage Scrub
Riversidean Desert Sage Scrub
Sagebrush Steppe
Desert Sink Scrub
Mafic Southern Mixed Chaparral
San Diego Mesa Hardpan Vernal Pool
San Diego Mesa Claypan Vernal Pool
Alkali Meadow
Southern Coastal Salt Marsh
Coastal Brackish Marsh
Transmontane Alkali Marsh
Coastal and Valley Freshwater Marsh
Southern Arroyo Willow Riparian Forest
Southern Willow Scrub
Modoc-Great Basin Cottonwood Willow Riparian
Modoc-Great Basin Riparian Scrub
Modoc Desert Wash Scrub
Engelmann Oak Woodland
Open Engelmann Oak Woodland
Closed Engelmann Oak Woodland
Island Oak Woodland
California Walnut Woodland
Island Ironwood Forest
Island Cherry Forest
Southern Interior Cypress Forest
Bigcone Spruce-Canyon Oak Forest

S2.2 Active Coastal Dunes
Active Desert Dunes
Stabilized and Partially Stabilized Desert Dunes
Stabilized and Partially Stabilized Desert Sandfield
Mojave Mixed Steppe
Transmontane Freshwater Marsh
Coulter Pine Forest
Southern California Fellfield
White Mountains Fellfield

S2.3 Bristlecone Pine Forest
Limber Pine Forest
April 28, 2010

Mr. Rob Rundle
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Dear Mr. Rundle:

Re: San Diego Association of Governments’ Notice of Preparation of a Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan; SCH# 2010041061

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports.

The proposal is for the San Diego Association of Governments (SANDAG) 2050 Regional Transportation Plan (RTP). According to the Notice of Preparation (NOP), the 2050 RPT goals are “structured into two overarching themes: Quality of Travel & Livability, and Sustainability.”

Aviation plays a significant role in California’s transportation system. Within San Diego County are numerous airports and heliports including the following 12 public-use airports: Agua Caliente Springs, Borrego Valley, Brown Field, Fallbrook Community, Gillespie Field, Jacumba, McClellan-Palomar, Montgomery, Oceanside Municipal, Ocotillo, Ramona, and San Diego International.

The regional transportation planning process provides the opportunity to discuss the connection between land use and transportation planning and should address regional aviation issues and needs. Strong and effective local, regional, and state policies minimize adverse impacts arising from the encroachment of incompatible land uses around airports, adverse noise impacts on communities near airports, and congestion and/or delays related to airport ground access.

The protection of airports from incompatible land use encroachment is vital to the safety of airport operations and the well being of the communities around airports. As discussed in the Division’s “Aviation Planning Guidelines for Regional Transportation Plans,” available on-line at http://www.dot.ca.gov/hq/planning/aeronaut/documents/rtp2007guidelines.pdf, the best way to preserve and improve airports and their associated economic and quality-of-life benefits is to take timely proactive measures. Incompatible land uses around airports often result in public pressure to restrict operations (curfews, aircraft size limits, etc.), and impose noise, and growth controls. Failure to protect the airport may result in permanent closure, thereby reducing or eliminating its benefits. Airport staff, Airport Land Use Commissions (ALUC) and airport land use compatibility plans are necessary to protect an airport and the people residing and working in the vicinity of an airport.

"Caltrans improves mobility across California"
Coordinating the RTP with these other agencies should help to relieve future conflicts between an airport and its neighbors.

The role aviation plays in California’s transportation system includes the movement of people and goods within and beyond our State’s network of over 250 airports. Aviation contributes nearly 9 percent of both total State employment (1.7 million jobs) and total State output ($110.7 billion) annually. Aviation improves mobility, generates tax revenue, saves lives through emergency response, medical and fire fighting services, annually transports air cargo valued at over $170 billion and generates over $14 billion in tourist dollars, which in turn improves our economy and quality of life. These benefits were identified in the study “Aviation in California: Benefits to Our Economy and Way of Life,” available on-line at http://www.dot.ca.gov/hq/planning/aeronaut/econstudy2003.html.

These comments reflect the areas of concern to the Division of Aeronautics with respect to airport-related noise, safety, and regional land use planning issues. We advise you to contact our District 11 office concerning surface transportation issues.

For questions concerning these guidelines, please contact the Division’s liaison for San Diego County RTP review, Philip Crimmins, at (916) 654-6223.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314 or by email at sandy.hesnard@dot.ca.gov.

Sincerely,

(Sandy Hesnard)
SANDY HESNARD
Aviation Environmental Specialist

CC: State Clearinghouse, San Diego County ALUC
May 5, 2010

Mr. Rob Rundle, Project Director
SAN DIEGO ASSOCIATION OF GOVERNMENTS
401 “B” Street, Suite 800
San Diego, CA 92101

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

Dear Mr. Rundle:

The Native American Heritage Commission (NAHC) is the state ‘trustee agency’ pursuant to Public Resources Code §21070 for the protection and preservation of California’s Native American Cultural Resources.. (Also see Environmental Protection Information Center v. Johnson (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a ‘significant effect’ requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5 (b)(c)(1) CEQA guidelines. Section 15382 of the CEQA Guidelines defines a significant impact on the environment as “a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.” In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the ‘area of potential effect (APE), and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were identified within the APE, the County of San Diego land area. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as ‘consulting parties,’ for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the ‘Initial Study’ and in other phases of the environmental planning processes. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator’s office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11.
Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f]et seq.), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 et seq.) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes.

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC.

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or
medical examiner can determine whether the remains are those of a Native American. Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

[Signature]

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse
Native American Contacts
May 5, 2010
San Diego County

Barona Group of the Capitan Grande
Edwin Romero, Chairperson
1095 Barona Road Diegueno
Lakeside, CA 92040
sue@barona-nsn.gov
(619) 443-6612
619-443-0681

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

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

Santa Ysabel Band of Diegueno Indians
Johnny Hernandez, Spokesman
PO Box 130 Diegueno
Santa Ysabel, CA 92070
brandietaylor@yahoo.com
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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Project #2010041061; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2050 Regional Transportation Plan (RTP); San Diego Association of Governments (SANDAG); San Diego County, California.
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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SsCHF2010041601; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2050 Regional Transportation Plan (RTP); San Delgo Association of Governments (SANDAG); San Diego County, California.
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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SsCh#2010041061; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2050 Regional Transportation Plan (RTP); San Diego Association of Governments (SANDAG); San Diego County, California.
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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed ScCH#2010041061; CEGA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the 2050 Regional Transportation Plan (RTP); San Diego Association of Governments (SANDAG); San Diego County, California.
May 6, 2010

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

Dear Mr. Rundle:

Re: SCH# 2010041061; 2050 San Diego Regional Transportation Plan (RTP)

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The Commission is in receipt of the Notice of Preparation for the 2050 San Diego Regional Transportation Plan Programmatic Environmental Impact Report.

San Diego Association of Governments (SANDAG) is proposing regional transportation policy for the San Diego region, addressing all forms or modes, of transportation. The RTP will identify the facilities and programs that will be needed to meet travel demand through 2050.

For any projects identified related to or impacting rail transit or freight or passenger service crossings, Commission Staff should be consulted. Rail related projects must comply with Public Utilities Code Section 1201-1205, which requires Commission approval for projects involving the construction of new, or alterations of existing, public or publicly-use crossings.

Language should be in place so that any traffic impact studies undertaken should also address traffic increase impacts over affected crossings and associated proposed mitigation measures.

Thank you for your consideration of these comments and we look forward to working with SANDAG in future projects. If you have any questions in this matter, please contact Laurence Michael at (213) 576-7076, ldi@cpu.ca.gov or myself at (213) 576-7078, rxm@cpuc.ca.gov.

Sincerely,

Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division
June 16, 2010

Mr. Rob Rundle
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA, 92101

Dear Mr. Rundle:

SUBJECT: COMMENTS REGARDING THE NOTICE OF PREPARATION FOR THE SANDAG 2050 REGIONAL TRANSPORTATION PLAN PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (SCH 2010041061)

The California Water Quality Control Board, San Diego Region (San Diego Water Board) appreciates this opportunity to comment on the San Diego Association of Governments (SANDAG) Notice of Preparation (NOP) for the Programmatic Environmental Impact Report (PEIR) for the 2050 Regional Transportation Plan (RTP). The RTP establishes regional transportation policy for all forms, or modes, of transportation within the region covered by SANDAG (includes all 18 municipalities and the unincorporated County of San Diego).

The San Diego Water Board’s comments are submitted in accordance with California Environmental Quality Act (CEQA) Guidelines section 15096, which requires CEQA responsible agencies to specify the scope and content of the environmental information germane to their statutory responsibilities, and lead agencies to include that information in their environmental documents.

The State Water Board and the Regional Water Quality Control Boards (Water Boards) regulate discharges to protect the quality of water of the State, broadly defined as "the chemical, physical, biological, bacteriological, radiological, and other properties and characteristics of water which affects its use."\(^1\) If projects authorized under the 2050 RTP have any of the following discharges, the project proponent will be required to obtain a permit from the Water Boards:

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\(^1\) California Water Code, section 13050.
Discharge Type

- Discharge of dredge and fill materials
- Wastewater/stormwater discharges
- Other discharges of waste

Types of Permits Involved

- Clean Water Act (CWA) section 401 water quality certification for federal waters; or Waste Discharge Requirements for non-federal waters.
- CWA section 402 National Pollutant Discharge Elimination System permit (e.g., storm water permit\textsuperscript{2}, new construction general permit (new CGP).
- Waste Discharge Requirements or other permits for discharges that may affect groundwater quality and other waters of the State, such as operation of proposed solid waste transfer facilities, and other proposed project activities.

Early consultation is encouraged, to avoid any costly project reconfigurations, necessary to adequately avoid and minimize impacts to State waters.

Goals

SANDAG presents two overarching themes in the goals for the 2050 RTP. The first is the "Quality of Travel & Livability and Sustainability" which relates to how the transportation system functions from the individual customer perspective (Mobility, Reliability, and System Preservation & Safety). The second is "Sustainability," which relates to making progress in Social Equity, Healthy Environment, and Prosperous Economy from a regional perspective.

The 2050 RTP and the overarching theme of "Sustainability" is important to the Water Boards. This is because the most basic goal of the San Diego Water Board is "to preserve and enhance the quality of water resources in the San Diego Region for the benefit of present and future generations." The theme of sustainability, goes hand-in-hand with the goal of preserving and enhancing the quality of water resources, and vice-versa. Also, the theme of "Quality of Travel & Livability and Sustainability" is important to the Water Boards because the design and operation of the transportation system can significantly impact water resources, including water quality, hydrology, and beneficial uses of waterbodies. Thus, a well designed transportation system is key for accomplishing the goals of the 2050 RTP, and the goals of the Water Boards.
scope and level of needed analyses

the 2050 RTP PEIR should characterize the cumulative, direct, and indirect impacts to the quality of waters of the state caused by projects which the RTP would authorize, and should identify alternatives and other mitigation measures to reduce and eliminate such impacts. Analyses should include:

1. Characterization of Impacts – Watershed Level Effects

Watersheds are complex natural systems in which physical, chemical, and biologic components interact to create the beneficial uses of water on which our economy and well-being depend. Poorly planned urban transportation projects upset these natural interactions, and degrade water quality through a web of interrelated effects.

These impacts typically degrade water quality, increase peak flows and flooding, and destabilize stream channels; resulting in engineered solutions to the disrupted flow patterns and, ultimately, near-total loss of natural functions and values in the affected basins. The water quality impacts of urban transportation systems are best avoided by directing the location, pattern, and design of the transportation system development, rather than through traditional regulation of discharges. Many of the intractably degraded waters currently on the Water Boards' list of impaired waterbodies are degraded by conditions directly affected by transportation planning.

The Water Boards' are mandated to prevent such degradation. CEQA establishes the process to provide the information we need to do so. Specific technical comments indicating the information and analyses germane to our statutory responsibilities are provided in the following attachments to this letter:

- Attachment 1, Urban Development: Potential Water Quality Impacts and Required Analyses. Outlines and diagrams the potential effects of land development on water quality and identifies related information needs.
- Attachment 2, Low Impact Development References. Lists documents providing guidance on principles and practices to avoid water quality and quantity problems associated with urban development.
- Attachment 3, Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources. Provides information and references on the importance of stream corridors, wetlands, and other waters in maintaining local and regional habitat connectivity.

As noted above, we believe avoidance is the best strategy for managing potential water quality impacts. For unavoidable impacts, understanding how pollution pathways will operate is essential to managing them.
Please:

A. Specify at a watershed-level of detail the causes, natures, and magnitude of impacts which would result from projects authorized under the Regional Transportation Plan, referring to Attachments 1 and 3 to these comments.

B. Quantify impacts as definitively as feasible, using appropriate modeling and adequate data. Modeling approaches should be documented; and data deficiencies or other factors affecting the reliability of the results identified and characterized.

C. Identify whether impacts will be temporary or permanent.

2. Avoidance and Minimization Analysis

The RTP has the potential to degrade water quality in many ways. Fortunately, avoiding or minimizing any step in a pollution pathway will eliminate or reduce subsequent effects, and will simplify the associated needed analyses. Furthermore, a small number of key variables control most of the pathways causing water quality degradation. We strongly encourage avoidance as the primary strategy to address water quality concerns.

Please:

A. Include measures to avoid or minimize each potential cause of water quality degradation as described in Attachments 1 and 3 to these comments.

B. Provide an analysis of why any remaining impacts cannot be avoided or further minimized.

3. Alternatives Analysis

Because development projects can individually and cumulatively cause major water quality impacts, we strongly encourage a low-impact planning approach.

Please:

A. Include in the alternatives presented in the PEIR a low-impact approach for future authorized projects, based on principles and practices described in the documents listed in Attachment 2 to these comments, *Low Impact Development References*.

B. Such an approach generally involves more compact development that:
   - Minimizes generation of urban pollutants;
   - Preserves the amenity and other values of natural waters;
Maintains natural waters, drainage paths, landscape features and other water-holding areas to promote stormwater retention, pollution removal, and groundwater recharge;

Designs communities and landscaping to minimize stormwater generation, runoff, and concentration; promote groundwater recharge; and reduce water demand; and

Promotes water conservation and re-use.

4. Identification of Affected Waters

A clear understanding of the location and nature of the waters potentially affected by this project is fundamental to fulfillment of our regulatory responsibilities.

Please:

A. Provide regional-scale map and general description of all waters potentially affected by projects authorized by the RTP, tabulated and organized by watershed (drainage basin) and waterbody type; e.g., wetlands, riparian areas (as defined by the National Academy of Sciences), streams, other surface waters, and groundwater basins.

B. For waterbodies expected to be directly affected by projects authorized by the RTP, identify the acreage and, for drainage or shoreline features, the number of linear feet potentially impacted, and sum the total affected acres and linear feet by waterbody type.

C. Identify at planning area-scale any “isolated” wetlands or other waters excluded from federal jurisdiction by court decisions.

3 “Riparian areas are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological process, and biota. They are areas through which surface and subsurface hydrology connect water bodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., a zone of influence). Riparian areas are adjacent to perennial, intermittent, and ephemeral streams, lakes, and estuarine-marine shorelines” (National Research Council. Riparian Areas, Functions and Strategies for Management. National Academy of Sciences, Washington, D.C., 2002). Riparian areas are created and maintained by periodic inundation by overbank flood flows from the adjacent surface water bodies.

4 e.g., U.S. Supreme Court, Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers, 2001.
5. **Low Impact Development**

A 2050 RTP which utilizes Low Impact Development (LID) stormwater design as an integral part of transportation development and re-development could help to alleviate transportation system impacts to water resources and improve sustainability, social equity, and healthy environment. For example, roadways and other impermeable surfaces to be built as part of the transportation system can cause an increase in runoff velocity, generate an increase in channel and stream bank erosion, cause an increase in sediment pollution and negatively impact beneficial uses, especially aquatic-habitat dependent beneficial uses. Also, transportation systems can be significant sources of gaseous, liquid, and solid pollutants that can be discharged into waterbodies by stormwater runoff. For example, Chollas Creek was placed on the Clean Water Act, section 303(d) impaired waterbody list due to polluted stormwater runoff. To remedy the water quality impairment, Chollas Creek currently has in effect, a TMDL (Total Maximum Daily Load) for metals (including copper, lead, and zinc) in storm water runoff. One of the primary sources for copper in runoff from urban pavement includes brake lining wear, while zinc sources include tire and engine wear. Lead sources include tailpipe emissions and brake pads.

Applied on a broad scale to the transportation system, LID can help to maintain or restore the water quality and beneficial uses of waterbodies. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product.

There are many practices that have been used to adhere to LID principles. Some of these practices include: (1) making sensitive choices in site layout leaving sensitive natural areas undeveloped; (2) utilizing pervious surfaces (e.g., permeable pavements); and (3) directing runoff to bioretention facilities, flow-through planters, dry wells, cisterns and rain barrels. By implementing LID stormwater design, water can be managed in a way that reduces the impact of built areas in transportation systems and promotes the natural movement of water within an ecosystem or watershed.

Please:

A. Implement LID stormwater design as an integral part of the 2050 RTP.

6. **Lessons Learned from Peer Regions**

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SANDAG’s “Lesson’s Learned from Peer Regions” prepared by Parsons Brinckerhoff (December 2009) identifies Portland as a benchmark transit city due to successes with improving mobility and sustainability in response to sprawl, the environment, livable communities, and quality of life issues. The lessons learned should be expanded to include the items below.

Please:

A. Include successes with improving water quality and protecting the beneficial uses of waterbodies through implementation of Low Impact Development (LID) Best Management Practices (BMPs) at railway right-of-ways, park and ride lots, bus stops, transit stations, and support building areas. For example, the parking areas within Portland’s Max Light Rail support building areas incorporate LID BMPs, and have pavement that lets water drain through it, which reduces runoff.

B. Include successes with incorporating planting strips for bioswales. For example, Portland’s Max Yellow Line at Delta Park/Vanport Station utilizes bioswales for stormwater filtration to treat stormwater from the street, tracks, and light rail operations; and these bioswales incorporate planting strips where exotic invasive plants have been removed and these areas replanted with native plants appropriate for the area. Consideration of the utilization of native plants appropriate to the specific area, and removal of invasive exotic plants detrimental to the area will provide broad-scale watershed benefits protecting waterbodies and their beneficial uses.

7. Hydrologic Disruption Analysis

Because increased runoff from developed areas is the key variable driving a number of other adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation in subsequent project-specific EIRs.

San Diego Water Board Order R9-2007-0001, Provision D.1.g requires the San Diego Stormwater Copermittees to implement a Hydromodification Management Plan (HMP) “…to manage increases in runoff discharge rates and durations from all Priority Development Projects, where such increased rates and durations are likely

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6 California Regional Water Quality Control Board, San Diego Region, Order No. R9-2007-0001, NPDES No. CAS018758, Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority. Available online at: http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/sd_stormwater.shtml
to cause increased erosion of channel beds and banks, sediment pollutant generation, or other impacts to beneficial uses and stream habitat due to increased erosive force." Priority development projects are required to implement hydromodification mitigation measures so that post-project runoff flow rates and durations to not exceed pre-project flow rates and durations where such increases would result in an increased potential for erosion or significant impacts to beneficial uses.

Please:

A. Include in the alternatives and mitigations analyses measures to maintain the pre-project hydrograph.

B. Provide a meaningful analysis of potential cumulative impacts to watershed hydrology from existing and planned development in the watershed or planning area.

8. Habitat Connectivity Analysis

Riparian corridors and other waters within the regulatory purview of the Water Boards play an important role in maintaining habitat connectivity. Both aquatic and terrestrial habitat may be fragmented by impacts to streams, riparian areas, or other waters.

Please:

A. Analyze the regional importance of movement corridors in and along waterbodies, the potential effect of disrupting such corridors, and the potential for enhancing such corridors through mitigation measures.

B. Include information regarding any sensitive plant and animal species that likely utilize the corridors.

C. Identify any impacts to riparian or other waters that could compromise future remediation of existing connectivity barriers.

D. To inform these analyses, consider the information and literature referenced in Attachment 3, *Terrestrial Habitat Connectivity Related To Wetland, Riparian, and Other Aquatic Resources*, including recent data on the role of riparian corridors as movement corridors in California.

9. Sustainable Communities Strategy - Emissions Reduction Targets

SANDAG presents the 'Sustainable Communities Strategy' and explains that it must demonstrate how the development patterns and the transportation network, policies, and programs can work together to achieve the greenhouse gas emission reduction targets for cars and light trucks.

Please:
A. Expand the Sustainable Communities Strategy to acknowledge other important benefits of the greenhouse emission reduction targets for cars and light trucks. For example, the reduction of greenhouse gas emissions could also reduce aerial deposition of other pollutants associated with cars and light trucks, and hence reduce pollutant loading into storm water runoff.

10. Pollution Prevention

Pollution prevention measures are important for maintaining water quality and beneficial uses of waterbodies, and need to be identified to ensure water quality will not be impacted.

Please:

A. Identify pollution prevention measures to be implemented. This includes, but is not limited to Best Management Practices (BMPs) such as providing trash receptacles along transportation corridors at places where people gather or stop to enter any transit station or vehicle (including bus stops), regular pickup of trash placed in collection containers, regular maintenance of trash receptacles, periodic pickup of trash deposited on the ground or not in the trash receptacle, and periodic pickup of trash which accumulates by other means along the transportation corridor.

Again, thank you for this chance to comment. We welcome the opportunity to work with you to make SANDAG's RTP an example of environmental sustainability in California. If we may clarify any of our comments or be of further assistance, please contact Ms. Linda Pardy at 858 627-3932 or LPardy@waterboards.ca.gov.

Respectfully,

DAVID T. BARKER
Supervising Engineer

dtb:cmc:llp

Attachments:
Attachment 1-Urban Development: Potential Water Quality Impacts and Required Analyses.
Attachment 2-Low Impact Development References.
Attachment 3-Terrestrial Habitat Connectivity Related to Wetland, Riparian, and other Aquatic Resources.
cc: Mr. Ed Pert, Regional Manager  
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State Clearinghouse and Planning Unit  
Governor's Office of Planning and Research  
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Urban Transportation Development:  
Potential Water Quality Impacts and Required Analyses

INTRODUCTION

This Attachment consists of a table and a diagram showing how urban development can affect water quality, and the information needed to predict and manage the impacts. Pollution pathways are described and diagrammed at the level of detail at which potential effects can be analyzed and management measures applied. The table and diagram are described (and in electronic version hyperlinked) below.

Watersheds are complex natural systems in which physical, chemical, and biologic components interact to create and maintain the beneficial uses of water on which society's well being and economy depend. Similarly, disturbances to natural watershed dynamics caused by urban development degrade water quality through a complex of interrelated causes and effects. Unmanaged, these pollution pathways ultimately destroy the physical, chemical, and biological integrity of the watersheds in which they occur, diminishing or destroying the beneficial uses.

The table and diagram are:

Table 1, Potential Effects of Urban Development on Beneficial Uses and Required Analyses outlines the causes of water quality degradation caused by urban development, provides literature citations for each of the effects, and identifies for each effect the project-specific information needed to assess and mitigate its adverse impact to water quality.

Figure 1, Potential Effects of Urban Transportation Development on Beneficial Uses flowcharts the causes and effects listed in Table 1. It begins on the left with three activities which are associated with urbanization: filling, construction (active construction and post-construction phases), and channelization. Figure 1 ends on the right with the resulting impaired beneficial uses and the potential for increased maintenance and property damage. In between are intermediate processes. Cause-and-effect relationships are shown by arrows.
## Potential Effects of Urban Transportation Development on Beneficial Uses and Required Analyses

Urban transportation development degrades water quality through a complex of interrelated causes and effects.

### How to Use this Table

Table 1 outlines the pollution pathways potentially associated with urban development, providing literature citations for each cause-and-effect relationship, and identifies the information needed to assess and manage potential effects on a project-specific basis. The pollution pathways are described at the level of detail at which project-specific potential effects can be analyzed and management measures applied. The same analysis can also be applied more broadly at a general level, e.g., to urban development that would be authorized under a land-use general plan. This Table is comprised of three worksheet sub-tables described below. (In the electronic version of this table, the sub-tables are accessed via tabs at the bottom of the page).

The "Potential Water Quality Impacts and Required Analyses" worksheet displays the potential causes and effects (in the "Cause" and "Effect" columns respectively) of water quality degradation associated with urban development, and the information needed to assess and manage project-specific effects (the "Needed Analysis" column). Because of the complex nature of watershed dynamics, many "effects" are also "causes" along the pollution pathways, and the number in square brackets listed with each "effect" cross-reference to its enumerated place in the "Cause" column. Additionally, each of the "effects" is footnoted, and the footnote number refers to the associated note in the "Notes" sub-table.

A related flow-chart diagram (Figure 1, "Potential Effects of Urban Transportation Development on Beneficial Uses") graphically displays these cause-and-effect relationships.

The "Notes" worksheet displays the summary literature citations for each of the "effects" in the "Potential Water Quality Impacts..." sub-table, keyed to the numeric footnotes in the "Effects" column.

The "References" worksheet displays the full literature citations, indexed by author.

<table>
<thead>
<tr>
<th>CAUSE</th>
<th>EFFECT</th>
<th>NEEDED ANALYSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. FILL &amp; EXCAVATION</td>
<td>A. Decreased Flood Storage. [4]</td>
<td>1) Quantify reduced flood storage in each affected basin. 2) Identify mitigation.</td>
</tr>
<tr>
<td></td>
<td>B. Change in Groundwater Storage. [10]</td>
<td>1) Quantify groundwater response to changes in percolation. 2) Identify locations where linear alignments could act to dewater shallow aquifers. 3) Identify mitigation.</td>
</tr>
<tr>
<td></td>
<td>C. Change in Wetland and Riparian Vegetation. [17]</td>
<td>1) Identify and map types and areal extents of affected vegetation. 2) Identify mitigation.</td>
</tr>
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<td>CAUSE</td>
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<tr>
<td>D. Impaired Beneficial Uses. [18]</td>
<td>Fill can directly impair beneficial uses by reducing water area and changing hydrology, geomorphology, substrate, and other waterbody characteristics. In addition, projects which fragment habitat and reduce wildlife movement along riparian and other corridors can degrade remaining patches of wetlands and other habitat by changing their physical characteristics and by isolating and exposing small populations of plants and animals, resulting in local or regional extinctions.</td>
<td>1) Document types, areal extents, and (for drainage features) lengths of affected waters. 2) Characterize and map at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 3) Identify effects of fill on terrestrial and aquatic habitat connectivity (refer to Enclosure 3). 4) Identify watershed-level effects on pollutant removal and flood retention. 5) Identify mitigation.</td>
</tr>
</tbody>
</table>

| Clearing, grading, and construction of structures and facilities. | Construction can produce pollutants through improper use and disposal of toxic construction materials. | 1) Identify location and extent of planned grading. Display proximity and slope relationships to receiving drainages. 2) Document erodibility of soils and subsoils in areas proposed for grading. 3) Quantify amount and duration of increased sediment loadings to each affected drainage. 4) Identify mitigation. |
| B. Change in Soil Erosion. [8] | Active construction can dramatically increase soil erosion by exposing and destabilizing soils. Erosion is compounded by the increased runoff typically accompanying construction. | 1) Identify location and extent of planned grading. Display proximity and slope relationships to receiving drainages. 2) Document erodibility of soils and subsoils in areas proposed for grading. 3) Quantify amount and duration of increased sediment loadings to each affected drainage. 4) Identify mitigation. |
| C. Increased Runoff. [9] | Construction can increase both the total and peak volume of stormwater runoff by removing vegetation, compacting soil, exposing dense subsoil, creating steep graded slopes, and eliminating terrain depressions and ephemeral and intermittent drainages that would naturally slow the movement of stormwater. | 1) Identify mitigation. |

| D. Impaired Beneficial Uses. [18] | Projects which fragment habitat and reduce wildlife movement along riparian and other corridors can degrade remaining patches of wetlands and other habitat by changing their physical characteristics and by isolating and exposing small populations of plants and animals, resulting in local or regional extinctions. | 1) Characterize and map at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 2) Identify effects of construction on terrestrial and aquatic habitat connectivity (refer to Enclosure 3). 3) Identify mitigation. |

<p>| 2B. POST-CONSTRUCTION | A. Dry weather discharge. [6] | Identify volumes, seasonality, and other pertinent characteristics of &quot;nuisance&quot; flows for each affected drainage. |
| Ongoing effects of constructed environment. | Construction can cause dry-season &quot;nuisance&quot; runoff from activities such as landscape irrigation, sidewalk and vehicle washing, and basement dewatering. | 1) Characterize volumes, seasonality, and other pertinent characteristics of &quot;nuisance&quot; flows for each affected drainage. |</p>
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<tbody>
<tr>
<td>B. Increased Groundwater Pumping. [5]</td>
<td>Construction can cause increased groundwater pumping for domestic or landscape use.⁴</td>
<td>1) Quantify and map locations of increased pumping.</td>
</tr>
<tr>
<td>C. Production of Urban Pollutants. [7]</td>
<td>After construction, urban areas can generate pesticides, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, bacteria, viruses, and other pollutants from activities such as landscape care and vehicle operation and maintenance.⁷</td>
<td>1) Quantify projected increase in pollution production in each affected basin. 2) Identify mitigation.</td>
</tr>
<tr>
<td>D. Change in Soil Erosion. [8]</td>
<td>After construction, erosion can be reduced to below natural levels because soils are covered with buildings and pavement, and runoff is routed through storm drains.⁸</td>
<td>1) Quantify reduction of natural sediment delivery rates to each affected basin. 2) Identify mitigation.</td>
</tr>
<tr>
<td>E. Increased Runoff. [9]</td>
<td>After construction, maintained landscapes and impervious surfaces such as roofs and streets increase total and peak runoff. The increased flows move quickly over paved surfaces and are collected, concentrated, and further accelerated in storm drain systems. The combination of increased flows and more efficient transport causes a higher, “flashy”, more rapidly peaking and falling hydrograph, especially for smaller, more frequent floods.¹⁰</td>
<td>1) Quantify project-induced changes in total and peak runoff rates to each affected drainage. 2) Identify mitigation.</td>
</tr>
<tr>
<td>3. CHANNELIZATION Engineered changes in channel structure or morphology to stabilize banks, prevent flooding, or increase flow conveyance.</td>
<td>A. Decreased Flood Storage. [4]</td>
<td>1) Quantify and map reductions in flood storage in each affected basin. 2) Identify mitigation.</td>
</tr>
<tr>
<td></td>
<td>Channelization can reduce flood storage within a basin by restricting flows to the active channel, thereby preventing detention of floodwater in backwaters and on the adjacent floodplain.¹²</td>
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## POTENTIAL EFFECTS OF URBAN TRANSPORTATION DEVELOPMENT ON BU & RQD ANALYSES

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</table>
| **C. Channel Destabilization.** [11] | Channelization can cause channel destabilization by changing the balance between the stream's flow, sediment load, and channel form. Destabilization tends to affect entire stream systems. For example, channelization can concentrate and synchronize peak flows from tributary streams, causing increased channel erosion both above and below the channelized reach. The eroded sediment is then deposited downstream when the flow slows down, where it may initiate further destabilization.\(^\text{15}\) | 1) Quantify basin-level hydrologic and fluvial geomorphic effects of channelization in each affected drainage.  
2) Identify mitigation. |
| **D. Increased Flooding Frequency.** [14] | Constricted channels (e.g., in leveed sections) can cause water to back up, resulting in localized upstream flooding. Rapid passage of floodwaters through "improved" channels can increase flooding downstream by concentrating and synchronizing tributary peaks.\(^\text{16}\) | 1) Quantify basin-level hydrologic effect of channelization on each affected basin, including changes in flood return frequencies.  
2) Identify mitigation. |
| **E. Decreased Pollutant Removal.** [16] | Channelization can decrease natural pollutant removal by reducing instream structural complexity and turbulent-flow aeration, increasing flow velocity, reducing overbank flow, and by causing change in vegetation.\(^\text{17}\) | 1) Map waters lost to channelization in each affected drainage and characterize type, areal extent, and pollutant removal value.  
2) Quantify affect on pollutant loadings to each affected waterbody and downstream receiving waters.  
3) Identify mitigation. |
| **F. Change in Wetland and Riparian Vegetation.** [17] | Channelization and associated maintenance can directly destroy wetland and riparian vegetation and can change site features to prevent reestablishment of characteristic species.\(^\text{18}\) | 1) Map and identify types and areas of affected vegetation.  
2) Identify mitigation. |
### CAUSE: G. Impaired Beneficial Uses. [18]

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<tr>
<td>Channelization and associated maintenance can directly impair beneficial uses by reducing waterbody area; increasing stream velocity; disrupting riffle and pool sequences, cover, and other structural features; changing substrate; cutting off nutrient inputs to and from backwaters and riparian wetlands, dewatering upstream reaches, and reducing aesthetic and recreational value. Reduced overbank flooding can adversely affect reproduction of riparian vegetation and wetland and riparian functions. Channelization can inhibit the movement of fish, other aquatic biota, and wildlife, and thus isolate and reduce the viability of populations up and downstream. Construction of channels can introduce sediment, nutrients, and toxics into the ecosystem.</td>
<td></td>
</tr>
<tr>
<td>1) Identify direct and indirect effects of proposed channelization projects on beneficial uses. 2) Characterize and display at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 3) Identify effects of channelization on terrestrial and aquatic habitat connectivity. 4) Identify mitigation.</td>
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### 4. DECREASED FLOOD STORAGE

| A. Increased Runoff. [9] | 1) Quantify total and peak volumes of increase runoff for each affected drainage. 2) Identify mitigation. |

- Reduced flood storage on the floodplain and in channels, swales, wetlands, backwaters, and other natural depressions increases and accelerates runoff. |

### 5. INCREASED GROUNDWATER PUMPING

| A. Change in Groundwater Storage. [10] | 1) Quantify and map locations of project-induced changes in groundwater levels. 2) Identify mitigation. |

- Increased groundwater pumping can lower water tables locally or in distant donor basins. |

### 6. DRY WEATHER DISCHARGE

| A. Change in Baseflow. [12] | 1) Quantify hydrologic effects of dry weather flows on the baseflow of each affected drainage. |

- Dry weather runoff from urban activities can increase dry-period streamflows. |

| B. Increased Pollutant Delivery. [13] | 1) Quantify and characterize pollutant loadings from activities generating dry weather runoff to each affected drainage. 2) Identify mitigation. |

- Dry weather runoff can carry the pollutants generated by the activity causing the flow, e.g., pesticides, nutrients, and petrochemicals from landscape maintenance and cleaning sidewalks and vehicles. Collection of polluted dry weather flows in catch basins may result in shock loadings when it is displaced by subsequent storm flows. |

### 7. PRODUCTION OF URBAN POLLUTANTS

| A. Increased Pollutant Delivery. [13] | 1) Quantify and characterize pollutant loadings from to each affected drainage. 2) Identify mitigation. |

- Increased production of urban pollutants can cause increased delivery of pollutants to surface and groundwater. |
### ATTACHMENT 1 - TABLE 1
### POTENTIAL EFFECTS OF URBAN TRANSPORTATION DEVELOPMENT ON BU's and RQD ANALYSES

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</table>
| 8. CHANGE IN SOIL EROSION    | A. Channel Destabilization. [11] Changes in upland soil erosion can destabilize stream channels by changing the amount of sediment carried into the stream. The stream may then erode or aggrade its channel to balance its available energy with the changes in its sediment load. | 1) Conduct geomorphologic analysis of channel response to increases in construction-related sediment.  
2) Conduct geomorphologic analysis of channel response to long-term reductions in sediment delivery to each affected drainage.  
3) Identify mitigation.  
Note: Sediment as a pollutant is considered in No. 7, "Production of Urban Pollutants". |
|                              | 1. Increased sediment from construction causes channel aggradation, changing stream cross sections and redirecting flows.  
2. Decreased sediment from a paved watershed can cause channel incision and/or side-cutting. The effect may be compounded by increased runoff from the paved watershed. Aggradation may occur downstream where the flow slows and deposits the eroded sediment, which may deflect flows against the channel banks and cause further bank erosion. |                                                                                  |
| 9. INCREASED RUNOFF          | A. Change in Soil Erosion. [8] Increased runoff can dramatically increase soil erosion by causing greater runoff velocities which more effectively displace and carry soil particles. Construction-related soil destabilization can compound the effect. | 1) Quantify increases in sheet and gully erosion resulting from increased runoff.  
2) Identify mitigation. |
|                              | B. Change in Groundwater Storage. [4] Increased runoff can reduce groundwater recharge and lower water tables, since water draining from impervious surface is unable to percolate to groundwater at that location. | 1) Map locations of and quantify losses of recharge and water table response.  
2) Identify mitigation. |
|                              | C. Channel Destabilization. [11] Increased peak runoff can destabilize channels by increasing the flow velocity and erosive power of the stream. Head cutting, incision and/or widening of the channel, and associated sideslope failures can result. Reduced sediment input as a result of change in soil erosion rates can compound the effect. In small streams, increased runoff may also dislodge logs and other channel features that help to define the channel. | 1) Quantify channel geomorphic response to increased runoff for each affected drainage.  
2) Identify mitigation. |
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</table>
| D. Increased Pollutant Delivery. [13] | Increased runoff increases pollutant delivery because it can more effectively carry particulate and soluble pollutants to receiving waters. Increased flow velocity reduces contact time with soil and vegetation that might otherwise remove pollutants. | 1) Quantify types and quantities of increased pollutant loadings to each affected drainage.  
2) Identify mitigation. |
| E. Increased Flooding Frequency. [14] | Increased runoff and greater transport efficiency result in higher peak flows from storms of a given return period. | 1) Quantify basin level hydrologic effect of increased runoff on each affected basin, including changes in flood return frequencies.  
2) Identify mitigation. |
| F. Change in Water Temperature. [15] | Increased runoff from urban areas can raise the temperature of receiving waters because runoff from impervious surfaces is often warmer than runoff from pervious surfaces or subsurface flow. | 1) Model increase in water temperature along stream profile of each affected drainage.  
2) Identify mitigation. |
| G. Impaired Beneficial Uses. [18] | Increased runoff can impair habitat values by flushing fish and invertebrates out of streams, increasing water level fluctuations and the velocity of flows entering wetlands, and causing salinity changes in estuaries and other nearshore marine waters. | 1) Identify direct effects of increased flow on aquatic biota, hydrologic regimes of adjacent wetlands, and salinity of marine receiving waters for each affected drainage.  
2) Identify mitigation. |
| 10. CHANGE IN GROUNDWATER STORAGE | A. Change in Baseflow. [12] | Changes in watertable level can cause changes in the dry weather baseflow of streams fed by groundwater. | 1) Quantify for each affected drainage the changes in baseflow associated with lowered water tables and map locations.  
2) Identify mitigation. |
| | B. Change in Wetland and Riparian Vegetation. [17] | A lowered watertable can dry up wetlands, stress or kill mature riparian vegetation, and reduce or eliminate seedling survival. | 1) Identify types and areas of wetlands and riparian areas that would be affected by expected lowering of shallow water tables and map locations.  
2) Identify mitigation. |
| | C. Impaired Beneficial Uses. [18] | A lowered watertable can impair water supply and other beneficial uses which use groundwater. Seawater intrusion is possible in coastal areas. Aquifer compaction and subsidence can also occur. Wetland and riparian areas can be dewatered, harming associated vegetation and habitats. | 1) Identify affects of expected water table lowering on water supply and other beneficial uses and map locations.  
2) Identify mitigation. |
| 11. CHANNEL DESTABILIZATION | A. Channelization. [3] | Channel erosion can threaten property and structures, leading to placement of riprap or other engineered stabilization of critical sections. | 1) Identify stream reaches in which project-induced channel destabilization may require channelization.  
2) Identify mitigation. |
<table>
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<tr>
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<tbody>
<tr>
<td><strong>B. Change in Groundwater Storage.</strong> [10]</td>
<td>Channel incision can dewater shallow aquifers adjacent to the channel.</td>
<td>1) Identify and map stream reaches in which project-induced stream incision may dewater shallow aquifers. 2) Identify mitigation.</td>
</tr>
<tr>
<td><strong>C. Increased Pollutant Delivery.</strong> [13]</td>
<td>Channel erosion can result in increased suspended solids and turbidity in the water column.</td>
<td>1) Identify and map stream reaches subject to project-induced destabilization, quantify changes in channel dimension, and volume of eroded material for each affected basin. 2) Identify mitigation.</td>
</tr>
<tr>
<td><strong>D. Increased Flooding Frequency.</strong> [14]</td>
<td>Channel aggradation can cause local flooding by diverting flows and decreasing a stream’s flow capacity.</td>
<td>1) Identify and map stream reaches in which project-induced channel destabilization may cause aggradation and associated flooding. 2) Identify mitigation.</td>
</tr>
<tr>
<td><strong>E. Change in Water Temperature.</strong> [15]</td>
<td>Bank erosion and aggradation can increase water temperature by creating a broader channel with shallow flows, increased water surface relative to flow volume, and a smaller proportion of shaded water surface. As a result, summer water temperatures and daily and seasonal temperature fluctuations tend to be greater.</td>
<td>1) Identify and map stream reaches in which project-induced destabilization can increase water temperature. 2) Identify mitigation.</td>
</tr>
<tr>
<td><strong>F. Change in Wetland and Riparian Vegetation.</strong> [17]</td>
<td>Channel destabilization can encroach on riparian wetlands and undermine streamside vegetation.</td>
<td>1) Identify, characterize, and map wetland and riparian areas subject to encroachment by channel destabilization. 2) Identify mitigation.</td>
</tr>
<tr>
<td><strong>G. Impaired Beneficial Uses.</strong> [18]</td>
<td>Channel destabilization can reduce or eliminate habitat, recreation, esthetic values, and other uses by affecting deep pools, pool-riffle ratios, undercut banks, substrate suitability, and other structural features.</td>
<td>1) Identify, characterize, and map stream reaches in which channel destabilization can directly impair beneficial uses. 2) Identify mitigation.</td>
</tr>
<tr>
<td><strong>H. Increased Maintenance and Property Damage.</strong> [19]</td>
<td>Channel erosion can undermine streamside buildings, bridges, utility crossings, and other property. Aggradation can bury diversion structures and other infrastructure and may require removal to maintain flow capacity.</td>
<td>1) Identify and map stream reaches in which destabilization may cause increased maintenance and property damage. 2) Identify mitigation.</td>
</tr>
<tr>
<td><strong>12. CHANGE IN BASEFLOW</strong></td>
<td><strong>A. Change in Groundwater Storage.</strong> [10]</td>
<td>Reduced stream baseflow can decrease groundwater recharge by reducing wetted area and the amount of water available for recharge in stream channels.</td>
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</table>
### Potential Effects of Urban Transportation Development on BUs and ROQ Analyses

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<tr>
<td>B. Change in Water Temperature. [15]</td>
<td>Decreased baseflow, typically resulting from change in groundwater storage, can cause elevated and fluctuating stream temperature because groundwater usually enters the stream at cool, stable temperatures.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1) Identify and map affected stream reaches; 2) Quantify temperature effects along stream profile; 3) Identify mitigation.</td>
<td></td>
</tr>
<tr>
<td>C. Change in Wetland and Riparian Vegetation. [17]</td>
<td>Decreased stream baseflow can cause riparian vegetation to shift to upland species.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1) Characterize and map affected riparian areas. 2) Identify mitigation.</td>
<td></td>
</tr>
<tr>
<td>D. Impaired Beneficial Uses. [18]</td>
<td>Decreases in the amount or duration of baseflow can impair habitat quality by eliminating aquatic and riparian habitat area, reducing flow velocities, and otherwise disrupting the life cycles of plants and animals which are dependent on water. Increases in baseflow resulting from dry weather discharge can impair waterbodies such as seasonal wetlands, vernal pools, and intermittent streams which are naturally defined by seasonal water availability.</td>
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<tr>
<td></td>
<td>1) Identify and map affected waterbody segments. 2) Characterize and quantify changes in baseflow. 3) Identify direct effects on beneficial uses 4) Identify mitigation.</td>
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</table>

#### INCREASED POLLUTANT DELIVERY

<table>
<thead>
<tr>
<th>13. INCREASED POLLUTANT DELIVERY</th>
<th>A. Impaired Beneficial Uses. [18]</th>
<th>Urban pollutants can impair many beneficial uses, e.g., water supply, recreation, fish and wildlife habitat, and shellfish production.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1) Identify direct effects of increased pollutant loadings on beneficial uses in each affected waterbody segment. 2) Identify mitigation.</td>
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</table>

#### INCREASED FLOODING FREQUENCY

<table>
<thead>
<tr>
<th>14. INCREASED FLOODING FREQUENCY</th>
<th>A. Channelization. [3]</th>
<th>Increased flooding can lead to channelization of the critical section to more efficiently pass flood flows.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1) Identify stream reaches in which project-induced flooding may require channelization. 2) Identify mitigation.</td>
<td></td>
</tr>
<tr>
<td>B. Impaired Beneficial Uses. [18]</td>
<td>Increased flooding can impair habitat, water supplies, navigation, and other beneficial uses.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1) Identify stream reaches in which project-induced flooding may impair beneficial uses. 2) Identify mitigation.</td>
<td></td>
</tr>
<tr>
<td>C. Increased Maintenance and Property Damage. [19]</td>
<td>Increased flood frequency can result in more maintenance and flood damage.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>1) Identify stream reaches in which project-induced flooding may increase maintenance and property damage. 2) Identify mitigation.</td>
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#### INCREASED WATER TEMPERATURE

<table>
<thead>
<tr>
<th>15. INCREASED WATER TEMPERATURE</th>
<th>A. Impaired Beneficial Uses. [18]</th>
<th>Increased water temperature can directly stress aquatic biota and can also affect other parameters associated with habitat quality, such as dissolved oxygen concentration and rate of chemical reactions.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1) Identify and map affected waterbody segments. 2) Quantify temperature changes. 3) Characterize effects on beneficial uses. 4) Identify mitigation.</td>
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</tr>
<tr>
<td>16. DECREASED POLLUTANT REMOVAL</td>
<td>A. Increased Pollutant Delivery. [13] Less removal of pollutants by natural processes can result in greater concentrations of pollutants in receiving waters. ⁵⁰</td>
<td>1) Quantify effects to pollutant loadings for each affected waterbody. 2) Identify mitigation.</td>
</tr>
<tr>
<td></td>
<td>B. Change in Water Temperature. [15] Loss of riparian vegetation can increase maximum water temperature by exposing more water surface to the sun. Daily and seasonal temperature fluctuations also tend to be greater. ⁶²</td>
<td>1) Identify and map stream reaches in which loss of riparian vegetation can increase water temperature. 2) Identify mitigation.</td>
</tr>
<tr>
<td></td>
<td>C. Decreased Pollutant Removal. [16] Removal of vegetation adjacent to a waterbody can reduce removal of pollutants from the waterbody and from the overland flow draining to the waterbody. ⁶³</td>
<td>1) Describe type, areal extent, and pollutant removal value of affected vegetation and map location. 2) Identify mitigation.</td>
</tr>
<tr>
<td></td>
<td>D. Impaired Beneficial Uses. [18] Loss of vegetation directly impairs the quality of aquatic and riparian habitat by reducing cover, structural diversity, and nutrient sources. ⁶⁴ Removal of vegetation can also fragment and isolate remaining patches of habitat, resulting in decreased habitat value over large areas. ⁶⁵</td>
<td>1) Identify affected waterbody segments. 2) Characterize direct effects of vegetation loss on beneficial uses. 3) Characterize and display at project-area and regional scales existing wildlands, along with riparian corridors and other water features supporting habitat connectivity. 4) Identify effects of vegetation change on terrestrial and aquatic habitat connectivity. 5) Identify mitigation.</td>
</tr>
</tbody>
</table>

18. IMPAIRED BENEFICIAL USES Figure 1 - End point for water quality impairment.

19. INCREASED MAINTENANCE AND PROPERTY DAMAGE Figure 1 - End point for maintenance and property damage effects.
POTENTIAL EFFECTS OF URBAN TRANSIT DEVELOPMENT ON BENEFICIAL USES

This diagram shows how urban transit development can affect beneficial uses of water.

Figure 1
Low-Impact Development References

Low-impact (LID) development generally involves more compact development that:

- minimizes generation of urban pollutants;
- preserves the amenity and other values of natural waters;
- maintains natural waters, drainage paths, landscape features and other water-holding areas to promote stormwater retention and groundwater recharge;
- designs communities and landscaping to minimize stormwater generation, runoff, and concentration; promote groundwater recharge; and reduce water demand;
- promotes water conservation and re-use.

The following documents are among many that provide more specific guidance in LID.


Prince George’s County, Maryland, Department of Environmental Protection. Low-Impact Development Hydrologic Analysis. January 2000.


Further Online References:

United States Environmental Protection Agency: http://www.epa.gov/smartgrowth/
State Water Resources Control Board

Terrestrial Habitat Connectivity Related To Wetland, Riparian and Other Aquatic Resources,
Terrestrial Habitat Connectivity as Related To
Wetland, Riparian, and Other Aquatic Resources

"Habitat connectivity" refers to the need for plant and animal populations to have some mobility over the landscape, i.e., to avoid becoming "isolated" or "disjunct."\(^1\) A large body of research has demonstrated that such "isolated" populations face a high probability of eventual extinction, even if their immediate habitats are spared.\(^2\) In general, the smaller such an isolated population, the more quickly it will die out. Urban development typically fragments habitat by creating artificial landscapes which are movement barriers for most species. Unless mitigation measures are taken, isolated, non-viable populations are created as buildings, roads, and landscaping cut off lines of movement.

In the context of wetlands, "habitat connectivity" refers to three related phenomena:

a. The need of some animals to have access to both wetland and upland habitats at different parts of their life cycle. Some wetland animals, e.g., some amphibians and turtles, require access at different seasons and/or at different life stages to both wetland and to nearby upland. Preserving the wetland but not access to upland habitat will locally exterminate such species.\(^3\)

b. The ecological relationship between separate wetlands. Some wetland communities and their associated species comprise networks of "patches" throughout a landscape. Wetland plants and animals are adapted to the presence of wetland complexes within a watershed and are dependent on moving among the wetlands within the complex, either regularly or in response to environmental stressors such as flood or drought, local food shortage, predator pressure, or influx of pollution. Removing one such water from the complex will reduce the biological quality of the rest, and at some point the simplified wetland complex will be incapable of supporting at least some of the species, even though some wetlands remain.\(^4\)

c. The role wetlands and riparian corridors play in allowing larger-scale movements. Some strategically located wetlands and continuous strips of riparian habitat along streams facilitate connectivity at watershed and regional scales for terrestrial as well as aquatic and amphibious species.

As noted above, habitat connectivity is critical to biodiversity maintenance, and will become more so because of global warming. Significant range shifts and other responses to global warming have already occurred. The ability of biotic populations to move across the landscape may be critical to their survival in coming decades.\(^5\)
Such mobility may occur at the level of the individual organism (e.g., a bird or turtle travelling between separated wetlands) and/or of the population (e.g., a plant species colonizing a new wetland through seed dispersal); and over different time scales.

For the effects of habitat fragmentation and population isolation on the survival of plants and animals, see for example:


Regarding the relationship between wetland/riparian and upland habitats, see for example:


Regarding the ecological relationship between separated wetlands, see for example:


Recent reports comprehensively review observed effects of global change on plant and animal range shifts, advancement of spring events, and other responses. See:


June 17, 2010

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

Re: Comments on Notice Preparation of a Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan (RTP)

Dear Mr. Rundle:

The San Diego County Regional Airport Authority (SDCRAA) appreciates the opportunity to review and provide comments on the scope and content of the Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan (RTP). The SDCRAA believes that the following issues should be addressed:

1. **Airport Land Use Compatibility.** The SDCRAA is the Airport Land Use Commission (ALUC) for San Diego County. Pursuant to California Public Utilities Code § 21676(b), amendments to a general or specific plan, zoning ordinance, or building code within an Airport Influence Area (AIA) are subject to review by the local ALUC for a determination of consistency with the applicable Airport Land Use Compatibility Plan (ALUCP). Land uses governed by this amendment are located within the AIAs for the adopted ALUCPs for twelve public use airports and four military airports in San Diego County and, therefore, are subject to required ALUC review. The Programmatic EIR should evaluate land use compatibility with the allowed uses as delineated within the adopted ALUCPs. As several alternatives to be evaluated in the EIR will analyze land use patterns that further concentrate population and employment densities along transportation corridors, the alternatives analysis should consider land use compatibility with adopted ALUCPs.

2. **Regional Aviation Strategic Plan.** Following the requirement of California Senate Bill 10, the Airport Authority initiated the Regional Aviation Strategic Plan (RASP) to evaluate ways to optimize the public use airports in the region. The results of the RASP will be a key element in the future Airport Multimodal Accessibility Plan (AMAP), which is being prepared by SANDAG. The Airport Authority is working closely with SANDAG to ensure that the RASP is consistent with regional planning protocols and that the RASP and AMAP outputs can be incorporated and referenced in the RTP and Programmatic EIR.
3. **Consistency with Airport Master Plan and Destination Lindbergh Planning Efforts.** In 2008, the SDCRAA adopted the San Diego International Airport Master Plan that guides the airport uses and development on the 661 acres that comprise the Airport and are under the jurisdiction of the SDCRAA. In 2009, the SDCRAA participated in a multi-agency planning effort entitled Destination Lindbergh that evaluated off-airport alternatives for ground transportation to connect with San Diego International Airport including an Intermodal Transportation Center located north of the airport on the north side of Pacific Highway. The Intermodal Transportation Center envisions a combined light rail/heavy rail/high-speed rail station and vehicle parking that is connected via pedestrian bridges to expanded passenger processing facilities on San Diego International Airport. Since Destination Lindbergh is a multi-agency planning effort and a long-term vision for ground transportation connections to the Airport, it should be referenced in evaluating transit station locations in the transit network alternatives.

4. **Circulation, Traffic and Parking.** The SDCRAA adopted the San Diego International Airport Master Plan in May 2008 which included analyses of the circulation and traffic through the year 2030 in the environs surrounding San Diego International Airport. The Programmatic EIR should include analyses of the circulation and traffic impacts, including cumulative project impacts as the city-dedicated streets that serve the Airport would also serve a potential ITC. In addition, as vehicle parking is constrained at and surrounding San Diego International Airport, any potential land use alternatives that increase the demand for vehicle use and parking should be identified and describe how the demand for vehicle parking will be served.

5. **Transit Opportunities.** As the SDCRAA continues to explore airport transit improvements, any potential opportunities to improve transit connectivity to and through any high-speed rail stations are encouraged.

Thank you for the opportunity to provide comments. Please contact me if you have any questions at (619) 400-2478.

Thank you,

TED ANASIS, AICP
Manager, Airport Planning
San Diego County Regional Airport Authority

TA/lt
NOTICE OF PREPARATION FOR 2050 REGIONAL TRANSPORTATION PLAN EIR

Dear Mr. Rundle:

Thank you for the opportunity to comment upon the scope and content of the Environmental Impact Report (EIR) being prepared for the 2050 Regional Transportation Plan (RTP). Unified Port of San Diego (District) staff has reviewed the Notice of Preparation (NOP) dated April 19, 2010, and provide the following comments:

- The EIR should highlight how the proposed RTP policies, programs, and projects will impact lands within the District’s jurisdiction (see attached map).

- The EIR should clearly identify what land use and transportation network assumptions were used in areas that may impact San Diego Bay and the surrounding District tidelands. All 2050 land use assumptions for those areas under the District’s jurisdiction should be based upon the certified Port Master Plan. The EIR should also clearly state whether any assumptions were based on other key planning documents, whether produced by the District or by other jurisdictions.

- On May 18, 2010, the District and the City of Chula Vista City took several actions towards approval of the development of the Chula Vista Bayfront Master Plan (CVBMP). Central to these actions was the certification of the Final Environmental Impact Report (UPD #83356-EIR-658, SCH #2005081077), adoption by the Board of Port Commissioners of an amendment to the Port Master Plan, and adoption by the City of amendments to its General Plan and Local Coastal Program.

Now that the CVBMP has been approved by all local agencies, the land use and infrastructure development scenarios included in this plan should be carefully considered while crafting the 2050 RTP. All land use assumptions used in and around this area should be consistent with the approved CVBMP and should be explained in all alternatives. All potential environmental impacts to this planning area should also be thoroughly analyzed and discussed. We are particularly concerned how the anticipated widening of Interstate 5 will
affect the CVBMP. Attached is a map showing the CVBMP and its proximity to Interstate 5.

- The Freeway Access Study (2007) was commissioned by the Port of San Diego, in partnership with SANDAG, Caltrans, and the United States Navy. This study included the area from the San Diego Bay to Interstate 5 and from the 10th Avenue Marine Terminal to the National City Marine Terminal. The study examined the adequacy of access to the freeway system for existing District facilities, estimated associated travel demands, and developed recommendations for improvements to meet the freight truck traffic needs from various District facilities. District staff requests that SANDAG consider the Freeway Access Study recommendations while crafting the 2050 RTP.

- The existing railroad freight infrastructure that serves District facilities needs to be preserved, if not enhanced to allow for growth. District staff requests that the RTP not consider any actions that would result in the reduction of District cargo, freight and/or rail capacity.

- The EIR for the San Diego International Airport (SDIA) Master Plan includes identification of a number of specific roadway improvements to mitigate traffic impacts associated with the expansion of SDIA facilities. These improvements include the widening of Harbor Drive, Grape and Hawthorne Streets, and a variety of intersection improvements. The specific agencies responsible for implementing these measures have not yet been determined and these measures have not yet been fully vetted or evaluated by the District. District staff has, however, determined that some of the proposed improvements may adversely affect public access and District facilities as well as District tenant leaseholds. Therefore, if these improvements are included in the 2050 RTP, all land use assumptions should be thoroughly explained and all environmental effects caused by these improvements should be carefully analyzed.

- The EIR should analyze any changes or enhancements contemplated to the existing Interstate 5 ramp systems to provide access to the proposed SDIA Consolidated Rental Car Facility or the Intermodal Transportation Center being proposed along Pacific Highway. The EIR should discuss how ramp operations will be affected, and how traffic and land use could be impacted in the area surrounding these facilities, as well as the areas surrounding SDIA including District tidelands.

- We understand that SANDAG is the first major Metropolitan Planning Organization to adopt an RTP that complies with the provisions of Senate Bill 375 and the requirements for a Sustainable Communities Strategy to reduce Vehicle Miles Traveled and attendant greenhouse gas emissions. The RTP can respond to these mandates by taking advantage of and enhancing the existing transportation and land use links found within the District’s member cities: Chula Vista, Coronado, Imperial Beach, National City and San Diego.
For example, Downtown San Diego poses a model opportunity to demonstrate how well planned residential development, combined with efficient transit, open space, ample employment, tourism and amenities create the best value for each dollar of transit investment. The 2050 RTP should promote the potential for local shuttles and other transit opportunities in and around Downtown San Diego. This would include the shuttles that District staff has previously discussed with SANDAG, the City of San Diego and CCDC.

Please send two copies to the District's Land Use Planning Department when the Draft EIR is available for public review. If you have any questions or need additional information from the District, please contact me at (619) 686-6468, or Associate Redevelopment Planner Candice D. Magnus at (619) 686-6583.

Sincerely,

John W. Hemler
Director of Land Use Planning

Attachments: Port Jurisdiction Map
             Chula Vista Bayfront Master Plan Project Area Map

cc: Dirk Mathiasen
    Irene McCormack
    Candice D. Magnus
June 18, 2010

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

Sent via Email to: rru@sandag.org

COMMENTS ON THE 2050 REGIONAL TRANSPORTATION PLAN NOTICE OF PREPARATION

The County of San Diego has received and reviewed the Notice of Preparation for the 2050 Regional Transportation Plan (RTP) dated April 19, 2010 and appreciates this opportunity to comment. In response to the document the County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an affect on the unincorporated lands of San Diego County, reasonable alternatives and mitigation measures that the County will need to have explored in the environmental document.

The County Department of Planning and Land Use (DPLU), Department of Public Works (DPW), Department of Parks and Recreation (DPR), and the Air Pollution Control District (APCD) staff has completed their review and have the following comments regarding the content of the above documents:

LAND USE PLANNING

1. While the County's participation in the 2050 population forecasts, that are the basis for the 2050 RTP, includes the Referral Map (the proposed project for the County's General Plan Update) staff will be presenting the General Plan Update to the County Board of Supervisors this calendar year for adoption. If the Board of Supervisors adopts a different land use map than the Referral Map (which is a likely scenario) the County will request that SANDAG adjust its population and traffic forecasts to the extent practicable to reflect the new General Plan adopted by the County.
2. The EIR should list every Transportation Priority Project (TPP) area that meets the established criteria and analyze the most intensive use.

TRANSPORTATION AND CIRCULATION

3. The EIR should assess the benefits and impacts of each alternative to each community/area type within San Diego County. For example, a Modified Transit Network Alternative may reduce congestion along a specific corridor but increase congestion within certain development areas. Congestion may also increase along non-transit corridors.

4. A discussion assessment of an improved job-housing balance should be provided.

5. The Modified Transit Network Alternative should clarify if the alternative assumes a balanced funding allocation approach for highway and transit projects.

6. The EIR should assess the revenue requirements/constraints for each of the proposed alternatives.

7. The affects of recurring costs such as ongoing operating and maintenance costs should be estimated and assessed in addition to the initial capital costs.

8. The EIR should assess the consistency between the proposed 2050 RTP policies, programs, and projects, and the County's General Plan Update and/or current County policies.

9. The EIR should assess the impact of the proposed RTP alternatives to commute times, vehicle miles traveled (VMT), and Levels of Service (LOS) operations from the unincorporated communities to the employment centers located in the San Diego urban region like downtown San Diego and Kearny Mesa.

10. In addition to commute time, VMT, and LOS operations, the EIR should assess the impacts of the RTP alternatives to traffic safety operations for the major freeways and highways that serve the unincorporated communities such as SR-67 and SR-76.

11. The EIR should discuss Year 2050 land use and roadway network assumptions and assess the future transportation needs of the Otay Mesa region and their importance to regional border economies.

12. The EIR should explain the assumptions used for the areas outside the San Diego region such as Orange, Imperial, and Riverside Counties and Mexico.
13. The EIR should provide a detailed list of the projects and programs that would need to be implemented under the proposed RTP alternatives. The proposed projects and programs should be listed by the individual jurisdictions.

14. The EIR should identify the land use and trip generation assumptions for the local Indian tribal lands, especially those with gaming facilities.

PARKLAND AND TRAILS

15. When planning future transportation needs, the project should avoid impacting existing County parks and preserves or existing or planned trails to the maximum extent feasible. If impacts are unavoidable coordination with County DPR to determine appropriate mitigation measures is requested. In addition, multi-modal regional transportation needs should be considered.

ALTERNATIVES

16. Because of the unprecedented 40-year time horizon for the 2050 RTP, the EIR should make allowance as much as possible for a variety of different future environmental, technological, and policy milieus. For example, if climate change occurs as predicted by experts, the public will be anxious to know that lower-impact alternatives to current travel options are available. SB 375 appears to require such a consideration as well. For these reasons, additional transit and land use scenarios should be evaluated.

17. The alternatives should reflect comments from the expert Independent Transit Planning Review panel convened in 2006 to provide input to the current RTP. At that time, the panel suggested that:

- Continuing to expand the San Diego Trolley has significant drawbacks, since the current system does not connect the densest areas of development, is too slow to compete with automobiles, and is expensive to build;
- There are transit technology and service models from other countries that should be seriously considered. One such example is a network of “Quickways” – bus-type vehicles used in exclusive guideways that can route service around congestion but which can also use the road network and be deployed at far lower costs than light rail;
- Continued freeway expansion is not cost-effective in the long term and has a dampening effect on transit use.

The alternatives should be designed to reflect these possible trade-offs and opportunities.
18. The County recommends that the RTP EIR analyze an additional alternative that includes deep market penetration and fleet transformation of low and zero emissions vehicles (beyond those assumed by CARB in standard assumptions). It is very probable that this could be achieved through aggressive marketing campaigns, incentives, and infrastructure investments. The focus of the alternative should be passenger vehicles (cars and light duty trucks) which have been the target of SB 375. The alternative should consider that a comparable level of investment would be given to this effort that is being considered for SB 375 implementation measures. The County recognizes that some efforts in this area are already being undertaken such as that with the Nissan LEAF and that there will likely be other similar future efforts. However, much more could be done. If done right, San Diego could be the leader in low and zero emissions vehicles and reductions in greenhouse emissions could be greater than that achieved with any other program. This is especially true for the unincorporated County and many of the less urbanized jurisdictions.

19. Health Impact Assessment – Current thinking among public health practitioners includes the idea that transportation policy is, in part, health policy, because of the pervasive effect of transportation and land use arrangements on physical activity and other health factors. The Centers for Disease Control and Prevention, the Institutes of Medicine, and other federal agencies have called for evaluating the public health outcomes of different transportation and land use plans. Since the RTP 2050 will include a health element, the EIR should likewise include an analysis of the public health outcomes of different alternatives.

20. Transportation Economics – The economics of transportation are likely to be far different in 2050. For example, fuel prices may dramatically increase market demand for transit, walking, and bicycling, as well as housing choices to make these modes available to more residents. At least one alternative should be considered which reflects this possible scenario.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact LeAnn Carmichael at (858) 694-3739 or email at leann.carmichael@sdcounty.ca.gov.

Sincerely,

ERIC GIBSON, Director
Department of Planning and Land Use
cc:  Michael De La Rosa, Policy Advisor, Board of Supervisors, District 1 (via email)
     Megan Jones, CAO Staff Officer, DCAO, (via email)
     Nael Areigat, Project Manager, Department of Public Works, (via email)
     Lee Shick, Project Manager, Department of Public Works, (via email)
     Kenneth Brazell, Project Manager, Department of Public Works, (via email)
     Bob Goralka, Department of Public Works, Transportation Division, (via email)
     Andy Hamilton, APCD (via email)
     Bob Citrano, Planning Manager, DPLU (via email)
     Megan Hamilton, DPR (via email)
     LeAnn Carmichael, Planning Manager, DPLU (via email)
     Priscilla Jaszkowiak, Administrative Secretary, DPLU, (via email)
25 June 2010

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

Attn: Rob Rundle, Principal Regional Planner

RE: Comment for 2011 Regional Transportation Plan
Coronado Transportation Management

Dear Mr. Rundle:

Kindly accept my following comment for inclusion in the 2011 Regional Transportation Plan (RTP).

**Purpose.**

The purpose of my comment is inclusion in the 2011 RTP for consideration of Coronado transportation management, which will benefit those outside of Coronado in obvious ways. These are our neighbors with whom I seek to cooperate. I advocate for win-win transportation management and in no way, shape or form do I intend to disadvantage our neighbors through my suggestions.
25 June 2010
Coronado City Councilwoman Barbara Denny
Comment for 2011 RTP

**Background.**

As has been reported extensively in the news media, Coronado voters decisively defeated the Coronado tunnel project in the 8 June 2010 primary election by a margin of more than 2:1 with over 50% voter turnout. Voter turnout exceeded all expectations and predictions. As of the date of this letter, there were 3,437 votes against, or 66.98%, and 1,697, or 33.02%, for Proposition H (Coronado tunnel project study). There are 1,000 absentee/provisional ballots still to be counted. Some of these may be from Coronado voters. The results of the vote are not expected to change significantly.

**Action Plan for Coronado Transportation Management.**

In time, I am confident that Coronado can and will move on to focus on realistic and affordable transportation management that is suited to our particular geographic and demographic realities:

(A) Park & Ride
(B) Commuter Ferry
(C) Slugging (Casual Carpoolsing)
(D) Mass Transit
(E) MTS-Navy Express Buses
(F) Navy Van Pools.

The geographic reality of Coronado is that it is a peninsula with only three ways to/from town: the San Diego-Coronado Bridge (Blue Bridge), the Silver Strand, and the San Diego Bay Commuter Ferry.

The demographic reality of Coronado is that it is a relatively small town with a diverse and variable commuter population. Here is a thumbnail sketch. There are two major employment sources: The US Navy and tourism. The US Navy maintains and operates Naval Air Station North
25 June 2010
Coronado City Councilwoman Barbara Denny
Comment for 2011 RTP

Island (NASNI) and the Naval Amphibious Base (NAB). The vacation resorts attract long- and short-term tourists and employees: Marriott on the San Diego Bay, Loews on the Silver Strand and the Hotel Del Coronado on the beach in the village. Also medium-sized and small-sized hotels attract long- and short-term tourists and employees. There are employees and customers of the hospital complex, golf course and other businesses including, but not limited to, restaurants, retail, personal and professional services. Virtually all of the above employers receive deliveries from delivery persons on a regular basis. There are day-trippers who shop, dine and recreate in Coronado. Finally, there are the residents of Coronado, both year-round and seasonal. All of these people comprise the diverse and variable population of Coronado commuters.

Progress to Date on Action Plan for Coronado Transportation Management.

Since I was elected and sworn in to public office as a Coronado City Councilwoman in June 2009, I hit the ground running and have taken leadership to actively and consistently support the six transportation modes that already exist in our transportation infrastructure:

(A) Park & Ride
(B) Commuter Ferry
(C) Slugging (Casual Carpooling)
(D) Mass Transit
(E) MTS-Navy Express Buses
(F) Navy Van Pools.

Also, I have taken leadership to increase ridership in the above transportation modes. The reason is that if only 600 commuters use each of the above six transportation modes, then they will
eliminate 1,728,000 vehicle roundtrips to Coronado. Currently, over 500 commuters use the Navy Van Pool program. Obviously, a smart transportation policy requires continual increases in ridership to well over 600 commuters in each of the six transportation modes.

Based on my successful leadership in saving the Commuter Ferry from defunding in and around 2000, as well as my experience in land use law, it is my opinion that the only way to effectively manage traffic in Coronado is to reduce vehicle roundtrips to the island. This will reduce our carbon footprint according to the legal mandate, which by definition is not optional.

Future of the Action Plan for Coronado Transportation Management.

It is my request that regarding the SANDAG 2011 RTP:

1. **Park & Ride:** Coronado is included in and supported in making use of the approximately seventy-five existing Park & Ride spots in the region as noted on the SANDAG Park & Ride list. Also, Coronado is supported in securing the use of existing parking lots and structures, not currently on the list, in relevant and appropriate areas from which Coronado commuters can begin and end their commute. Finally, Coronado is supported in cooperating with people in jurisdictions across the bay who are interested in the economic development of new parking structures for use by Coronado commuters, as appropriate and feasible.

2. **Commuter Ferry:** Coronado is supported in increasing ridership on the ferry across the San Diego Bay. Note that the commuter ferry is the only way for cyclists to commute to/from work because there is no bicycle lane on the Blue Bridge. Also, the commuter ferry service should be expanded and extended to include direct or indirect service to all of the cities and areas that
(Commuter Ferry continued) share San Diego Bay -- Imperial Beach, Chula Vista, National City, San Diego City and Point Loma -- to the extent that it is appropriate, feasible and desired by people in these areas.

3. Slugging (Casual Carpooling): In existence in the USA since 1975, slugging is successful in the areas of the San Francisco Bay, Washington, DC and the Pentagon. It works slightly differently in each area depending upon the particular geography and demographics. It is my request that slugging be supported in our region, too. To that end, I request that there be **HOV (high occupancy vehicle) lanes on area highways** where there are currently none in order to encourage carpooling. For example, I suggest that **HOV lanes be instituted on State Route 5** from North County all the way south to the border, where feasible. In addition, there are more ways to support slugging which I will be pleased to share.

4. Mass Transit: Naturally in cooperation with MTS, Coronado is supported in transit service because of its unique geography which makes it arguably remote and because of its particular demographics.

5. MTS-Navy Express Buses: Currently in development, this innovative program should be supported.

6. Navy Van Pools: This program, which won multiple awards from SANDAG over the years, should continue to be supported.

**Conclusion.**

While I make the above requests to advocate for inclusion of a realistic and affordable transportation management plan for Coronado as part of the 2011 RTP, my requests offer obvious benefits to people outside of Coronado. These are our neighbors with whom I seek to cooperate. I advocate for win-win transportation management and in no way, shape
25 June 2010
Coronado City Councilwoman Barbara Denny
Comment for 2011 RTP

or form do I intend to disadvantage our neighbors through my suggestions.

This region is a world-class region in which to live, work and recreate. Our people deserve a world-class transportation infrastructure that includes all of the above six transportation modes operating at their fullest potential for the benefit of all.

I look forward to the members of SANDAG exercising their best judgment to ensure that this world-class region maintains a world-class transportation infrastructure.

Thank you for your consideration.

Respectfully,

Barbara Denny
Coronado City Councilwoman
June 22, 2010

Mr. Rob Rundle  
Principal Regional Planner  
SANDAG

VIA: e-mail  

RE: Notice of Preparation – Programmatic EIR for 2050 Regional Transportation Plan

Dear Rob,

Thank you for advising us of the preparation of the Environmental Impact Report (“EIR”) for the upcoming 2050 Regional Transportation Plan (“RTP”). This letter includes the City of National City’s comments and concerns about this planning effort.

As you may be aware, the San Diego County Air Pollution Control District has designated National City as an environmental justice community based on a formula showing the community experiences air particulates in excess of state standards and census tracts below 80-percent of the regional median income. The 2050 RTP can play an important role in addressing this problematic designation. The RTP can not only improve traffic flow and encourage the use of alternative modes of transportation to improve air quality, but it can also assist the City with economic development and beautification efforts to increase the quality of life for our residents and the region.

1. Based on a prior commitment from executive staff at both SANDAG and Caltrans to prepare a Project Study Report, the City of National City expects the 2050 RTP to:
   a. Identify a roadway realignment that provides a direct connection from Tidelands Avenue to Harbor Drive to accommodate industrial truck traffic associated with the San Diego Unified Port District’s National City Marine Terminal and reduce heavy truck traffic on local streets;
   b. Reconfigure the intersection of I-5 at Harbor Drive/Civic Center Drive/McKinley Avenue to expand capacity and improve operations to reduce vehicle delays and emissions.

2. Provide designated truck routes for regional industrial/shipping traffic.

3. Rail storage, queuing and maintenance functions to occur west of Haffley Avenue; i.e. the relocation of existing rail operations at Marina Way and Bay Marina Drive to BNSF Railway-owned property on Tidelands Avenue or elsewhere outside the City.

4. Add capacity and reduce choke points and weaving sections on both northbound and southbound I-5 between SR-54 and SR-15 to improve traffic flow and safety.

5. The intersection of I-5 off-ramp and W. 8th Street is very congested during peak hours and should be signalized. The ramp should also be realigned to eliminate the high-speed, right-turn slip lane to reduce conflicts with pedestrians and improve safety. The new alignment for the off-ramp should reflect a double left-turn lane and single right-turn lane.
6. Consider a grade-separation for the trolley crossing on W. 8th Street between I-5 and Harbor Drive to facilitate westbound Naval Base traffic that queues considerably in the AM when the trolley gates are down.

7. Enhancements to both the 8th Street Trolley/Transit Station and 24th Street Trolley/Transit Station are needed to improve circulation, parking, ADA accessibility and bus storage on-site; reconfiguration of the 24th Street Trolley/Transit Station should consider right of way dedication to convert Wilson Avenue between Mile of Cars Way (W. 24th Street) and W. 22nd Street to a two-way street to improve transit service to the station and expand capacity required to support redevelopment of the Westside Specific Plan Area.

8. National City requests that the Plaza Boulevard Widening Project be considered as a “high-priority” project for regional funding, as Plaza Boulevard represents a Regionally Significant Arterial. This project will improve accessibility and operations for the proposed BRT Station on I-805 at Plaza Boulevard by providing additional capacity to accommodate increased vehicular volumes, feeder transit service and the potential for transit priority lanes. Project environmental and final design are complete; however, there is a significant funding shortfall for construction.

9. The I-5 northbound off-ramp at Plaza Boulevard feeds traffic directly into the Old Town residential neighborhood of National City at high speeds. As such, we request that the 2050 RTP identify appropriate traffic calming measures to reduce impacts and improve safety for residents.

10. Consider an enhanced pedestrian trail or Class I Bike Path along the east side of I-805 from E. 4th Street, north across Division Street, towards the City of San Diego.

11. We express concerns about the proposed high speed rail being discussed for San Diego; said rail project must not preclude beautification, historic resources and/or economic development west of I-5 in National City’s Harbor District.

12. Consider a high-speed rail stop in National City – an area central to the San Diego coast line.

13. Recommend incentives for municipalities that host alternative energy plants or transfer centers (currently these types of projects do not produce property taxes, sales taxes or significant jobs, making them unattractive to local economic development efforts).

14. Identify aesthetic / landscaping improvements for the I-5 and I-805 corridors and interchanges, including maintenance to improve litter pick-up and control.

15. Identify seismic-retrofit improvements, as necessary, for overpasses and bridges.

16. National City requests the opportunity to participate in all stages of transportation planning to provide SANDAG valuable information and input as to community needs, economic development opportunities and environmental concerns.

The City of National City appreciates the opportunity to communicate about its interests and concerns for the 2050 RTP. Should you wish to discuss transportation planning efforts further, please contact Raymond Pe, Principal Planner at 619-336-4421 or Steve Manganiello, Traffic Engineer at 619-336-4382.

Sincerely,

Maryam Babaki, P.E.
Development Services Director / City Engineer
June 18, 2010

Rob Rundle, Principle Regional Planner
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101-4231
rru@sandag.org

RE: Notice of Preparation (NOP) for a Programmatic Environmental Impact Report (EIR) for the 2050 Regional Transportation Plan (RTP)

Dear Mr. Rundle,

The City of San Marcos Staff has reviewed the Notice of Preparation circulated on April 19, 2010. In addition, City Staff also attended the April 26, 2010 RTP workshop at Escondido City Hall. In response, the City of San Marcos has the following comments:

1. The City of San Marcos supports the “Many Centers” concept proposed in the initial 2050 RTP alternatives as it would provide an adaptable, high capacity and affordable bridge between the existing transportation networks in the north San Diego county region.

2. In addition, the City of San Marcos has invested in and deployed a traffic signal fiber optic network which could provide priority to high capacity buses at congested intersections effectively implementing a rapid bus system, as the Many Centers concept proposes.

3. The conceptual alignment for all the systems proposed in the alternatives show a connection from the city of San Marcos to Carlsbad via San Marcos Boulevard/Palomar Airport Road. This is an alignment that the City of San Marcos supports, as it would provide regional connections between high intensity areas, like the adopted San Marcos Creek District Specific Plan (which proposes 2,300 residential units, 1.3 million square feet of retail space and 589,000 square feet of office space on 214 acres south of San Marcos Boulevard west of State Route 78), the economic and job base surrounding the McClellan-Palomar Airport and Legoland.

4. The 2050 RTP should include the City of San Marcos’ proposed Intra-City shuttle system as a High Frequency Local Bus Service and identify interface points between regional transportation systems and the shuttle.

5. It appears that the boundaries of the “Urban Core Transit Strategy Study Area” do not include the San Elijo Hills and Old Creek Ranch Districts in the southwestern portions of the city. Please expand
the boundaries of the Study Area to include these areas of the City of San Marcos and southeast Carlsbad. Additionally, the Twin Oaks Valley/San Elijo Road corridor needs public transportation links to California State University San Marcos and regional transportation networks such as the SPRINT light rail system. The 2050 RTP should consider public transportation links that could address the needs of these areas.

6. The 2050 RTP should also incorporate the recommendations of the State Route 78 Corridor Study, especially the interchange improvements at the Nordahl Road Interchange.

7. The list of issues the Environmental Impact Report (EIR) is expected to address includes transportation. The City of San Marcos assumes this also includes traffic impact assessment and impacts to local jurisdictions.

8. The EIR should also identify and address the capacity issues of State Route 78 with future and cumulative traffic from regional growth and identify and methods to mitigate these impacts.

9. Traffic congestion on major regional arterials (San Marcos Boulevard/Palomar Airport Road, Rancho Santa Fe Road, Mission Road/Sante Fe Avenue, Twin Oaks Valley/San Elijo Road) from intra city cumulative traffic should also be addressed with mitigation in the EIR.

10. Finally, the City of San Marcos also has concerns that the “Intensified Land Use Distribution Alternative” may have conflicts with the areas identified for land use intensification in the Regional Comprehensive Plan (RCP). Alternatives to be considered should coincide with, and further the implementation of the RCP.

Please feel free to contact Sean del Solar in the Planning Division at (760) 744-1050, extension 3223 or sdelssolar@san-marcos.net to discuss the City’s comments.

Sincerely,

[Signature]
Jerrry Bayfam
Planning Division Director

CC: Mike Edwards, City Engineer
Sean del Solar, Assistant Planner
File
June 9, 2010

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

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

Dear Mr. Rundle;

Thank you for extending the opportunity to respond to the Notice of Preparation (NOP) of the Programmatic Environmental Impact Report (PEIR) for the 2050 Regional Transportation Plan (RTP). On behalf of the City of Solana Beach (City), we ask SANDAG to address the following concerns in the PEIR.

The staff report for Agenda Item No. 10-05-4 for the meeting of the SANDAG Board of Directors on May 14, 2010, indicates that “staff is proposing to include only the level of detail in the EIR necessary for a programmatic analysis, which means that all of the projects within the 2050 RTP will still require project level CEQA analysis at a future point in time.” However, SB 375 provides that some Transit Priority Projects (TPP) may be eligible for CEQA streamlining, including an exemption from any CEQA review under Public Resources Code section 21155.1. The staff report acknowledges there are conflicting legal opinions as to whether or not a city has the authority to require any environmental review at all of a TPP which meets the statutory requirements for an exemption.

To ensure that the PEIR’s review of the potential environmental effects of the 2050 RTP and its Sustainable Communities Strategy element is adequate and complete, we request that the PEIR include a comprehensive analysis of potential traffic impacts for all potential TPP sites. The traffic analysis should consider a worst-case scenario under the local zoning ordinances applicable to each site for both commercial and residential portions of the project.

The in-depth traffic analysis of potential TPP sites which the City asks to be included in the PEIR will promote the GHG emission reduction goals of SB 375 and is consistent with the policy goals of the recently adopted CEQA Guidelines for the analysis and mitigation of GHG emissions, which state that “the effects of GHG emissions resulting from individual projects are best addressed and mitigated at a programmatic level.” (Cal. Natural Resources Agency, Final Statement of Reasons for Regulatory Action (December 2009), p. 17.) The City’s request also is consistent with CEQA’s basic objectives that environmental impacts should be considered at the earliest possible stage and program EIRs should not be used to avoid analyzing reasonably foreseeable effects or to defer such analysis to a later stage.
We understand that, as committed to by the Executive Director at the meeting on May 14, 2010, SANDAG staff will work with the cities to obtain the information necessary to perform a comprehensive traffic analysis of potential TPP sites. The City looks forward to working with staff and to providing the information from its land use plans and zoning ordinance needed to accomplish this task. Thank you for your consideration.

Sincerely,

[Signature]

David Ott
City Manager

cc: Solana Beach Councilmembers
May 17, 2010

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

RE: SANDAG RTP 2050 Scoping and Sustainable Community Strategy

The California Construction and Industrial Materials Association (CalCIMA) represents construction aggregate, ready mix concrete and industrial mineral producers across the State of California. Our members operate quarries which are both production facilities as well as distribution centers for the rock sand and gravel used to build and maintain our bridges, homes, roads and hospitals. However, unlike other production and distribution facilities we cannot place these quarries just anywhere. They can only be placed where the natural mineral resource suitable for use was created by nature. We would like to thank SANDAG for the advanced consideration they have already given mineral resources through the San Diego Aggregate Supply Study.

We are excited that SANDAG will be developing the first Sustainable Community Strategy per SB 375 in conjunction with your RTP 2050 process. The importance of planning for mineral resources regionally was first recognized in 1976 with the adoption of the Surface Mining and Reclamation Act (SMARA), in which the legislature created a process for the identification and protection of mineral resources of regional and statewide significance. Impacts to mineral resources also have long been a part of CEQA project evaluations. However, it was not until the adoption of AB 32 and SB 375 that the environmental benefits of properly planning for future construction aggregate demand became readily apparent and a policy structure created that could achieve those benefits. The SB 375 Sustainable Community Strategy and RTP process can accomplish this.

Fortunately, thanks to the work by the California Geological Survey in quantifying future construction aggregate demand, and its work in mapping known construction aggregate deposits and recognizing them through a classification and designation process, as well as historic work on goods movement commodity flows by regional planning agencies, the benefits of planning, modeling and quantifying those efforts can now be seen and SANDAG’s process will hopefully validate those efforts in its Sustainable Community Strategy.

The California Geological Survey tells us that the San Diego Aggregate Consumption Region will consume over a billion tons of aggregate resources in the next fifty years as a result of the its work contained in Map Sheet 52. As a result of past state mineral resource designation
processes, as well as the eventual results of SANDAG’s own aggregate supply study, we will know where such resources exist suitable to meet that projected demand. We know from historic goods movement studies that non metallic mineral resources and aggregates comprise significant tonnage portions of goods movement in developed regions of the state. The December 2004, Regional Goods Movement Study for the San Francisco Bay Area states that clay glass concrete and stone was 17% of the Bay Area’s domestic commodity flows and nonmetallic minerals comprised another 13%. The Phase One SACOG Regional Goods Movement Study broke out gravel as 13% of tonnage of outbound commodity shares in 2002 and 28% of inbound flows, while nonmetallic mineral products comprised 14% of outbound shares and 6% of inbound. As such the flow of construction materials as sand and gravel and concrete appears to be in the neighborhood of 20-30% of goods movement by tonnage in a region. We were unable to determine if there was a previous goods movement study conducted by SANDAG that looked at commodity flows based on tonnage, but we would be surprised if such a study differed significantly from these other regional studies. As the SACOG study noted, “The obvious prominence of basic commodities such as sand, gravel, minerals and petroleum products is due to both demand and supply factors. Demand for these basic commodities is driven by population (food/fuel), agriculture (agricultural products, chemicals), and construction (sand, gravel, steel, lumber, cement).”

The process SANDAG is now embarking on provides the opportunity to take the known facts and integrate them into the regional planning processes. Construction aggregates are the basic building blocks of our society. As they can only be produced from areas with deposits with characteristics suitable to handle the rigors of a state as geologically active as ours, they provide SANDAG with an opportunity to model the goods movement for these materials, in conjunction with the mineral resource areas identified pursuant to the Sustainable Community Strategy, to demonstrate that the region has planned as effectively as possible in GHG reduction terms for the goods movement of these commodities. Likewise, inasmuch as prior to these activities, the trends in the commodity flows into the SANDAG region were such that, if they had continued, we believe would have modeled to create significant growth in both VMT for these trips, and as a result, increases in both GHG and criteria emissions. From these trips SANDAG may also be able to show reductions from that current baseline as a result of its planning activities. In 2008 we requested that Enviromine, Inc. do a brief summary of construction aggregate flows to meet transportation project demand in the SANDAG region based on existing permitted quarries. That preliminary work showed over three million tons of unmet construction aggregate demand in the region by 2020. Currently, from the State’s work on Map Sheet 52 we know that aggregate is already coming into the region from up to 90 miles away. SANDAG has the opportunity to identify construction aggregate resources suitable for the region’s needs closer than the currently projected supplies and demonstrate a potential to reduce GHG and criteria pollutant emissions as a result.

We encourage SANDAG within its environmental analysis for the various proposals, as well as within its baseline for such analysis, to use its significant modeling expertise to demonstrate the emission reductions achieved by the inclusion of mineral resources within the resource land use component of its Sustainable Community Strategy.
Because distance matters in this analysis, SANDAG is in a position to plan for the future mineral resources of the community and, as a result, limit the VMT of these trips as much as possible. Construction materials are a necessary commodity and the distribution centers for them are where nature placed the appropriate resources. How far we will need to ship them will depend on how well we protect the natural resource today.

As such, their inclusion within the Sustainable Community Strategy of SANDAG, where their importance can be balanced with other natural resources, as well as with the overall growth and development strategy for the region, is vitally important. We must plan today to ensure the quality of life, resources and infrastructure to support our civilization. It will help create a road map to our future, and proper planning today will ensure our children’s needs are met in the most environmentally responsible manner possible.

We look forward to working with SANDAG on its Sustainable Community Strategy and RTP 2050 process. We have attached copies of the documents referenced within this letter for your records and reference. Thank you for all of the work you have already undertaken in working to identify additional suitable mineral resources as well as working with our local Chapter.

Respectfully,

Adam Harper
Director of Policy Analysis

Attachments:

Regional Goods Movement Study For the San Francisco Bay Area – Final Summary Report 2004
SACOG Regional Goods Movement Study Phase One – Executive Summary 2006
MapSheet 52 – Aggregate Availability in California 2006
California’s Construction Aggregate Shortage: An Example from San Diego County
A Note on the Environmental Costs of Aggregates
May 18, 2010

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

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

Dear Mr. Rundle:

This letter is presented on behalf of the San Diego Chapter of the California Construction and Industrial Materials Association (CalCIMA). CalCIMA is the statewide trade association for construction aggregate, ready-mix concrete and industrial minerals in California. The San Diego Chapter represents the local members of the statewide association. Recently, a Chapter representative attended the 2050 RTP workshop on May 3rd, 2010. This letter provides comment on the three draft transit network alternatives presented at the workshop.

Changes in the economic environment have created significant budget challenges for transit in the past several years. This has been a result of reductions in sales tax receipts and funding from the State Transit Assistance (STA) funds. With the recent budget challenges, it has become increasingly difficult for San Diego's Metropolitan Transit System (MTS) to maintain a balanced budget. In their 2010 budget, they project a deficit of over $8 million by 2014. With the high cost and projected deficits for operating the current transit system, how will the funds for the proposed expansions be generated?

Alternatively, the high occupancy toll (HOT) lanes on I-15 have proven to be a success with benefit/cost analyses proving that the project benefits outnumber the costs. Moreover, a survey of I-15 users overwhelmingly revealed that funds generated from the HOT lanes should be used to improve or expand the existing road network. The same survey revealed that they did not support HOT funds to be used for transit...
improvements.\textsuperscript{1} It is important to note the I-15 managed lane program has encouraged commuter traffic, users found the pricing structure to be fair, and the highway maintained a level of service (LOS) C at all times.

The San Diego CalCIMA Chapter requests that before SANDAG considers increasing the transit system, they take into account the region's ability to support it financially. In addition, CalCIMA encourages the increased use of managed lanes. Based on the success of the I-15 example, expanding managed lanes is preferred among users and the benefits outweigh the costs.

Thank you for the opportunity to submit this comment letter. If you should have any questions or concerns please contact us at anytime.

Sincerely,

Jon Cloud
Chapter Chair

San Diego CalCIMA Chapter Contact info:
Crystal Howard
crystal@enviromineinc.com
619-284-8515

ConcernedAboutTraffic
cconcernedabouttraffic@cox.net

To: Rob Rundle

Subj: 3100500 NOP PEIR 2050 RTP

Thank you for the Scoping Meetings held around the county 4/26-5/6/10, attended
4/27/10 in Chula Vista; also for invitation to provide input re NOP. Our input about
additional topics for consideration in the 2050 RTP EIR follows; trying to correlate to
Sandag stated themes Quality of Travel/Livability, customer perspective, Social Equity.

1) **Smart Growth. Growth Should Pay For Itself.** All San Diego County jurisdictions
have local development impact fees for transportation infrastructure, since 2008
implementation of 2004 TransNet II Extension requirement in support of
Regionally Significant Arterials. Most had local road impact fees prior to that
date. Virtually no local jurisdictions have any component that mitigates by paying
a proportional fair share contribution toward regional transportation infrastructure
such as freeway, highway, mass transit; actually, maybe one or two do.

This lack means that every new residence constructed in the coming 10, 20, 30,
40 years will only further compound the cumulative infrastructure deficit to date. This lack should be remedied, since otherwise those further future deficits only
consume resources needed to ameliorate pre-existing cumulative deficits. Localities and projects that make some concrete provision, i.e. financially, should
be recognized as “smart growth” and those “local match” resources should
generate project evaluation priority point, e.g. perhaps an extra 5 points on eval.
hundred point scale, or in some other rationale manner that may be determined.

2) **Environmental Justice/Social Equity.** Historic distribution of funding both
TransNet/otherwise, perhaps from starting point of TransNet I, should be
analyzed for distribution equity on basis of raw geographic, relative per capita,
relative in relation to sub-regional resource generation (e.g. Transnet sales tax
proceeds), and relative per % of vote in favor of Transnet II extension.
Recognition should be accorded any disparities noted, and corrective action
initiated: Areas historically under-funded should be given relative prioritization
credits as determined to be appropriate, especially if those areas correlate with EJ
community parameters and locations.

a. **Inter-Generational Social Equity** - Consider long-term ramifications of
EAP expenditure distribution now relative to future needs/projects/areas
and possible restrictions in EJ areas over remainder of Transnet II time-
frame, as dwindling capital project potential falls heaviest on latest
timeframe projects/areas.

b. **Mode Distribution Equity** – What are stipulated relative proportions
(FreewayHighway/Transit/LocalRoad) in TransNet II, what is observed
ITOC/staff reported distribution of expended to date, planned to date, remaining available for future years? Analyze any indicated imbalances, recommend whatever corrective action plan might be warranted to maintain achieve stipulated balance.

3) **Level of Service.** Transit Mode Share is, say, 8%. Goal is increase by 25%. Say to 11%, or maybe 16% or even 25%. That means that roadways will still be shouldering most (75%-90%) of the load. Quality of Travel is highly (inversely) correlated with congestion/trip duration per mile traveled. Review LOS on existing non-upgraded versus newly upgraded key corridors. Prioritize equalization of any glaring imbalances. Examples: I-15 N corridor expands ($nM/mi), I-5 N corridor slated likewise ($nM/mi); recent EIR indicates I-5 S corridor peak hour LOS F, heading worse; what is comparative $nM/mi) planned, comparative timeframes? Perhaps equalize $nM/VMT, or other recommendation(s) as indicated by analysis.

ConcernedAboutTraffic is a recently formed group with a long-term and San Diego County region-wide perspective, with initial membership drawing from ChulaVista/SouthCounty area, but also from around the region.

Thank you for the Notice of Time Extension. These issues suggested for inclusion under planned section 16 Transportation of the 2050 RTP EIR. EIR’s deal in significant impacts mitigated/not, what is feasible/not. Findings of Feasibility/Infeasibility in any Statement of Overriding Considerations should include fact-based analysis as regards economic, roadway right-of-way constraint, economic/social justice factors having a bearing on the planned distribution of expenditures in 2050 RTP, i.e. to avoid any concerns of possible inadequacy of the EIR analysis and therefore the resultant plan.

Respectfully submitted,

David Krogh

On behalf of ConcernedAboutTraffic concernedabouttraffic@cox.net (CAT)

June 2010
June 17, 2010

VIA E-MAIL AND HAND DELIVERY

Rob Rundle, Principal Regional Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
E-Mail: rru@sandag.org

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

Dear Mr. Rundle:

We appreciate the opportunity to respond to the Notice of Preparation of a Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan project (dated April 19, 2010). The Notice of Preparation (“NOP”) announces that SANDAG will be the lead agency for preparation of an Environmental Impact Report (“EIR”) in connection with the 2050 Regional Transportation Plan (“RTP” or “Project”). The EIR is intended to satisfy the requirements of the California Environmental Quality Act (“CEQA”).

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

I. General Comments
The NOP indicates that the RTP goals have two overarching themes: “Quality of Travel & Livability” and “Sustainability.” Please ensure that these objectives are stated clearly in the EIR’s project description. CEQA requires that the statement of objectives include the underlying purpose of the project, clearly written to guide the selection of alternatives to be evaluated in the EIR.\(^1\) It is also important that the EIR maintain the consistency of these project objectives throughout the EIR. One of the most important requirements of CEQA is an accurate, stable, and informative project description.\(^2\)

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

In addition, the EIR should fully analyze indirect and displacement impacts. CEQA requires lead agencies to consider indirect impacts from a project.\(^3\) An indirect environmental impact is a change in the physical environment that is not immediately related to the project but that is caused indirectly by the project, occurs later in time, or is farther removed in distance than direct effects.\(^4\) CEQA also requires analysis of whether a lead agency’s action results in the displacement of development to other areas.\(^5\)

There are several potentially significant indirect or displacement impacts that should be fully analyzed in the EIR. For example, the RTP’s smart growth objectives, as implemented through the Sustainable Communities Strategy (“SCS”), could displace growth to extra-jurisdictional areas such as Riverside County, Imperial County, and northern Baja California, which would increase vehicle miles traveled (“VMT”). Also, the EIR should analyze the effect of smart growth transit planning on public health. Encouraging automobile-dependent modes could potentially increase obesity and respiratory disease.

Additionally, we request that the EIR fully consider the impact of the shift from petroleum fuels to sustainable alternative fuels, a trend that will certainly accelerate from the present until 2050. Consideration of this shift is important to maintaining the accuracy of the EIR’s environmental analysis. Please analyze the environmental impacts of constructing an electric charging infrastructure, which is a reasonably foreseeable indirect impact of the Project.

While the NOP indicates that the Project area is limited to the County of San Diego, the RTP could have potentially significant impacts to neighboring jurisdictions such as the counties of Orange, Riverside, and Imperial, as well as northern Baja California. Because these locations may be potentially impacted by the Project, please ensure that the EIR’s study area include these

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\(^1\) 14 Cal. Code Regs. §15124(b).
\(^3\) Stanislaus Audubon Soc’y, Inc. v County of Stanislaus (1995) 33 Cal.App.4th 144 (EIR required for golf course project because adverse impacts would result indirectly from later residential development that might be attracted to area by development of golf course).
\(^4\) 14 Cal Code Regs §§15064(d)(2), 15358(a)(2).
neighboring jurisdictions. This will foster comprehensive and coordinated transportation planning.

II. **Specific Comments**

A. **Air Quality and Greenhouse Gas Emissions**

Please analyze the RTP’s consistency with Assembly Bill 32, the California Global Warming Solutions Act of 2005. ⁶ AB 32 requires reduction of the state’s greenhouse gas (“GHG”) emissions. The RTP could have a significant impact on GHG emissions. To ensure that GHG emissions impacts are fully analyzed, please describe the RTP’s affect on VMT per capita and its correlation to GHG emissions.

Please also consider the air quality impacts of the shift from petroleum fuels to alternative fuels, and whether this shift could decrease the correlation between VMT and air quality impacts or GHG emissions.

B. **Land Use/Population & Housing**

Additionally, the EIR must analyze conformity with California’s landmark planning law, Senate Bill 375. ⁷ Because SANDAG is the first metropolitan planning organization to prepare an RTP with an SCS, it is particularly important to comply with SB 375. The SCS should demonstrate how transportation planning and development patterns interact to reduce GHG emissions. Please also ensure that all transportation funding assumptions in the EIR are consistent with SB 375. Moreover, the SCS should outline any planning assumptions that are inconsistent with local regulation such as general plans and zoning ordinances. Please also analyze the consistency of the SCS on the 2030 RTP. CEQA requires the discussion of the project’s consistency with existing plans and land uses, including the 2030 RTP.

The EIR should also discuss mitigation of impacts resulting from increased densities near urban areas and transit corridors. The redistribution of growth to urban areas could have indirect potentially significant environmental impacts in the areas of noise, public services and utilities, recreation, hazards, and public safety, among others. For example, the increased densities in the urban areas could exacerbate traffic congestion, which would in turn increase risk of harm to pedestrians and bicycle riders. At the same time, decrease in per capita GhG through increased transit use and walkable communities should be evaluated.

C. **Transportation**

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

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⁶ H & S Code § 38500 et seq.
⁷ Id. at p. 6-7.
growth in distant areas, which would result in increased VMT and associated environmental impacts.

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

Transportation options to the region’s three major employment centers, Golden Triangle/Sorrento Mesa, Kearny Mesa and Downtown should be carefully analyzed; and a transit only guideway connecting Mission Valley with Hillcrest should be carefully reviewed as a proposed project.

D. Alternatives

The California Supreme Court has described the discussion of alternatives as "the core of an EIR."\(^8\) The lead agency must select a reasonable range of alternatives for evaluation in the EIR when determining its scope.\(^9\) The NOP indicates that there will be four project alternatives: 1) No Project Alternative; 2) Intensified Land Use Distribution Alternative; 3) Modified Transit Network Alternative; and 4) Transportation Demand Management/System Management Alternative. To make certain that SANDAG considers a reasonable range of alternatives to the Project, the EIR should also include the following alternatives:

1) *Market-driven Alternative*

The Market-driven Alternative would analyze which transit modes are most likely to attract ridership and focus funding on those infrastructure projects. This alternative emphasizes more frequent service with increased connectivity that provides trip times competitive with the automobile. The Market-driven Alternative would reduce environmental impacts because it would decrease trip times and VMT, resulting in fewer air quality, GHG, noise, public health, and other impacts.

2) *Modified Freeway Network Alternative*

The Modified Freeway Network Alternative would evaluate decreased discretionary freeway funds and their reallocation to transit system improvements that would further implement the Project’s objectives and reduce environmental impacts.

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8 *Citizens of Goleta Valley v Board of Supervisors* (1990) 52 Cal.3d 553, 564.

9 14 Cal Code Regs §15126.6(a); see also *Citizens of Goleta Valley, supra*, 52 Cal.3d at 566; *In re Bay-Delta Programmatic Envt’l Impact Report Coordinated Proceedings* (2008) 43 C4th 1143, 1157 (based on public workshops, agency developed mission statement, program objectives, and solution principles that were used to create list of program alternatives discussed in program EIR).
3) **Private-funding Alternative**

The Private-funding Alternative would evaluate increased infrastructure projects and transit services funded and/or owned by private interests. It would include privately-funded toll road projects and privately-run transit operators. The Private-funding Alternative could reduce traffic congestion and other environmental impacts.

4) **Accelerated Build-out Alternative**

The Accelerated Build-out Alternative would evaluate the RTP planning scenario under the assumption that the TRANSNET sales tax could be leveraged with federal loans secured by those tax revenues. This alternative would significantly reduce environmental impacts over the life of the Project because reductions in VMT would occur sooner.

5) **Unconstrained Revenue Alternative**

The Unconstrained Revenue Alternative would analyze the construction of all infrastructure projects without regard as to their economic feasibility. Although this alternative would not meet the Project’s objectives, because it would be infeasible, it would be useful as a planning tool and would enhance the EIR.

E. **Performance Criteria and Plan Measures**

In Caltrans’ recently released Smart Mobility 2010 Framework, Climate and Energy Conservation performance measure quantifies how much energy is consumed through VMT. This performance tool measures “the effect of transportation and related land use decisions on the management of VMT and compares resulting emissions to State mandated regional targets. GHG emissions and energy consumption are also measures of the successfulness of location-efficiency and transportation management measures within a regional sustainable community strategy.”

Caltrans’ Climate and Energy Conservation performance measure is an important and effective tool for evaluating the need for future transportation network expansion. The energy conservation measures is a clear indicator that highway expansion can no longer support our energy needs when transit is a much better choice for reducing emissions and conserving energy. We encourage SANDAG to include a Climate and Energy Performance measure in accordance with the components of Caltrans Smart Mobility 2010 Framework.

F. **Economic Analysis**

What are the economic factors being considered? Transit has proven to save households money on transportation costs, and so has housing location efficiency. How will cost or savings per household be evaluated for potential RTP projects?
III. Conclusion

Move San Diego appreciates the opportunity to comment on the NOP and we respectfully request that you thoroughly review each of these comments and incorporate them in the EIR. We believe SANDAG has the ability to demonstrate leadership throughout the state of California as the first region to prepare and adopt an RTP with a new Sustainable Communities Strategy element. The shift to more sustainable regional transportation planning must begin to be implemented in the first five years of this RTP adoption, not 20-25 years out. As you proceed with the RTP’s environmental review process, we look forward to discussing these issues with you further. Please do not hesitate to contact us if you require more information regarding these comments.

Sincerely,

Elyse Lowe,
Executive Director
Move San Diego
elowe@movesandiego.org
June 10, 2010

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

RE: Notice of Preparation for a Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan ("NOP")  

Dear Mr. Rundle:

Pardee Homes appreciates the opportunity to provide input into the scope and content of the environmental review for the 2050 Regional Transportation Plan. In the list of issues to be addressed in the EIR, the Notice of Preparation indicates that "the EIR will address cumulative impacts, growth inducing impacts, and other issues required by CEQA." We would like to see that growth impeding impacts and growth displacement impacts also be added to that list of additional issues.

By way of an example, build-out of the Pacific Highlands Ranch community in the City of San Diego, as per the voter-approved Subarea Plan and its related Transportation Phasing Plan, is not permitted until the missing two connectors at I-5 and SR-56 are "open and operational." Given this voter-imposed restriction, if the connectors are not timely constructed and funded as part of the RTP, this approved growth, at over 3000 dwelling units (including 500 affordable units), will be displaced to other parts of San Diego County and beyond. Regardless of how much further out it pushes, it will require additional infrastructure - more lanes on I-15, I-805, I-5 or more transit miles. In addition, the environmental impacts of this displaced growth could include many of the 17 issues listed in your NOP such as air quality, energy, greenhouse gas emission, noise, socioeconomic/environmental justice, transportation and visual resources, and more.

Again, thank you for the opportunity to participate in the process that will develop the plan for the future of San Diego.

Sincerely,

Beth Fischer
Monday, May 17, 2010

Dear Mr. Rundle:

RE: Comments to NOP Regarding SANDAG’s Implementation of the California Environmental Quality Act – Senate Bill 375, vis-à-vis development of a Permanent Train Stop at the Del Mar Fairgrounds.

Friday, May 14, 2010 my wife and I were in attendance for the full SANDAG board’s discussion of the Sustainable Community Strategy contained in the above referenced bill, which you led.

That discussion occurred on the heals of my wife’s and my presentation to the SANDAG Executive Committee regarding pushing forward with the commencement of the detailed designs and environmental permitting for the Permanent Train Stop locate at the Del Mar Fairgrounds, north of the San Dieguito River.

Copies of our prepared presentations and the discussion document distributed to the Executive Committee are attached.

We find there is a strong convergence of these two issues: Our campaign to RE-establish the train stop; and the Sustainable Community Strategy’s goals, apparently embodied in SB 375.

The FOCUS of the goals = sustainable communities, and

The LOCUS of where/what transportation programs should be considered merge in the Permanent Train Stop project which has been “in planning” for now 25 years – with no action.

To understand this connection, let us examine the words presented in the power point slide which was on the screen for most of Friday’s discussion. “Section 21155 – applies to transit priority projects that are consistent with general use; designation, density, building intensity, and applicable policies.

Designation: It is noteworthy that the North County Transit District (NCTD) lists the fairgrounds as one of seven future ridership generators for the Coaster and Sprinter systems.
Bob Campbell, who is both Chair of NCTD and a member of the SANDAG board, can guide you to a powerful presentation from an urban transportation meeting he attended a few years ago in Chicago. We have visited that web site, and recall it being called “think Swiss.” He can give you precise internet directions.

It shows the **interdependence of physical developments with the development of reliable fixed route transit systems.** These are, in effect, what you attempted to show in your schematic presentations.

Anyone who has been to Montreal, Canada, or virtually any city in industrialized Europe has lived the phenomenon of new high density residential and retail developments being built at suburban commuter rail stations. These high density nodes are all linked via the fixed rail transit to the central business and commercial core.

To the degree that we now have the new **Pacific Station development in downtown Encinitas** and the **Bluwater Crossing development in Carlsbad** adjacent to the Poinsettia Station – we have the first baby steps toward such developments right here in North County.

**Coastal Oceanside**, with its higher density residential developments, hotels, and time shares adjacent to the pier area, and their central trains station servicing the Coaster, Sprinter and Amtrak is **becoming such a model.**

**Designation and Density: what should be the FOCUS and where the LOCUS?**

The asinine proposal to turn the fairgrounds into a self contained convention center is a contemporary example of what not to do if you want to fully utilize this State-owned land to its fullest Sustainable Community potential, and to harness the benefits of appropriate rail transportation.

Consider this:

- Virtually every county agency, adjacent city, thoughtful community group and a host of individual citizens have presented comments opposed to most of the proposed developments - The condo-hotel, health club and spa and some of the multi-story developments being principal amongst them.
- As the **attached** Wall Street Journal (WSJ) Article attests (which I have given to the 22nd DAA Fair Board on two occasions) – the WSJ article points out that the Condo-Hotel financing mechanism only works where there is a high year around desire for renting units at that location. It is highly unlikely that there will be high rental demand for such units during the fair’s “Scream Zone” or “Christmas Festival of Lights drive-through” etc. etc.
- The financing mechanism is based on a developer, with no capital involved, selling complete units to investors with the promise to “rent them out” when the owner does not need that unit’s use. The obvious targets to make such purchases
would be Thoroughbred owners who may wish to have such housing while they attend the Thoroughbred races. (This opens the question of to what number of weeks do they plan to extend the current “Boutique Meet” to? This is a very real marketing as well as added traffic and pollution impact question – which will not be reviewed here at this time.) Perhaps in theory the Thoroughbred owners would be so wealthy they would not mind not having income from the unit’s rental at other periods, however;

- Beyond the fact that the sale of air rights (condominiums) on State owned land is not appropriate – the potential for the lack of income from the “non-priority” periods, such as those sited above could lead to the embarrassing defaults cited in the WSJ.
- From the developer’s point of view, this financing mechanism may seem a dream. Thus I have on several occasions asked that members of the Fair Board who are championing this sub-prime financing mechanism to recuse themselves from the discussion or voting if they or their associates intend to be involved in such a development. To date none has done so.
- Only if the use of the fairgrounds is converted to what, in fact, would be characterized as a “year round self contained convention center” could such a condo-hotel financing scheme potentially be sustained.

What should be the FOCUS at this LOCUS?

This opens the question of what is the best Sustainable Community use for this State land? – And what type of transit system should support it?

The city of Solana Beach’s power point presentation regarding the Fair Board’s draft ERI for this development point out 19 pages on what they cite are woefully inadequate and incomplete deficiencies in the Fair Board’s draft EIR. (copy attached)

Among the host of technical deficiencies Solana Beach’s key point is that they, as an adjacent community, would obtain little or no benefit from the proposed self contained developments at the fairgrounds.

What then could be the FOCUS at this site which would promote community and regional sustainability?

My wife, in one of her many columns and editorials, in the November 27, 2009 issue of The Coast News (attached) noted that rather than creating a convention center space to compete with the Convention Center on the waterfront in Downtown San Diego, the fairgrounds would be the best place in the county to develop a sustainable living “learning center” at which everyone, of all ages, can finally learn what “sustainable living” real means and have fun time in the process.
Following this logic, the FOCUS of the 22nd District Agricultural Association should continue to be on horses – racing, jumping, western pleasure, polo and those events that take place there now could be expanded.

The focus of the 22nd DAA (whose middle name is Agriculture) could also be expanded many ways in that regard.

- That would include significantly expanded support of the 4H, FFA, and Grange programs which currently does not get anything close to the support provided by other fairs in the state. *(A DVD comparing Del Mar’s support for the student’s Junior Livestock Auction “add-on” program with that in Imperial County is enclosed as reference to this level of non-support at Del Mar.)*

- Suffice it to say that in Imperial County, (and on other counties) over the course of a typical 4H/FFA student’s middle-school and high school tenure, they can expect to raise between $10,000 and $25,000 toward their college education costs though the Fair facilitated add-on programs (where individuals pledge pennies per pound as an add-on gift which is “added to” the auction price for the student’s animal project sold at auction at the fair. The Fair bills for the “add-on” – the student has a responsibility to help collect – the Fair takes a 3% fee from the gift which is paid by the giver as a tax deductible gift to the student paid via the Fair - and the remaining 97% is a tax exempt contribution rebated by the Fair to the student - who typically places it into a college saving account.)

At the Del Mar Fair, which does not support this pennies-per-pound, and Fair bills activity, a San Diego County student is lucky to accumulate a net of several hundred dollars during their middle-school and high school 4H/FFA experience.

This opens the question: are not our San Diego County students just as worthy of a college education as Imperial, Napa, Kern and San Louis Obispo County’s? Should not the FOCUS of the Del Mar Fair be to maximize this potential?

- Agriculture is San Diego County’s fourth largest industry. There are hundreds of ways this fairground could be utilized to provide a beneficial FOCUS on this agricultural and animal husbandry industry than it now does.

- Plus there are a host of educational efforts which could be staged at the fairgrounds whose purpose is to promote sustainable (and healthy) living by individuals.

- I am impressed by the fact that Antioch University, which I very am familiar with, now offers an MBA in Organizational and Environmental Sustainability (Green MBA) as well as both a Master’s and PhD in Environmental Studies. Surely there are San Diego area universities which could utilize the fairgrounds and the adjacent lagoon, wetlands and ocean as the LOCUS for such an academic FOCUS.
A sustainable community FOCUS should also mean enhancing the activities at the Fairgrounds which build citizenship and expand the sense of community.

Q: And how would/could participants in such programs and events get to the Fairgrounds?

A: Via the fixed rail transit system which would deposit them ON the Fairgrounds at the rear of the parking lot, north of the San Dieguito River!!

This brings us again back to our key words, the second of which is DENSITY.

Beyond the obvious points made by Solana Beach, that the proposed self contained fairground developments provide little benefit to the surrounding cities – and with regard to traffic, noise and pollution, would create a great detriments; and,

Beyond the inappropriateness of some to the financing tools being proposed, i.e. the condo hotel, etc,

The question regarding density is what should take place on the fairground “campus” and what should be “off-campus.”

This is where the goals of SB 375 should intersect with the Permanent Train Stop.

Through permanent transit developments such as noted by Bob Campbell in the “think Swiss” presentation, it should be possible for persons wishing to attend the Thoroughbred Races, or the National Horse Show or other fairground activities to rent a unit in the high density areas of Oceanside or other communities and conveniently commute via Coaster to the long proposed train stop located at the rear of the track - at the west side of the Fairground’s parking lot, north of the river - from which these riders can easily walk to events, classes, and/or functions at the Fairground.

Through this dependable, predictable, fixed rail transit connection it should be possible for workers who do not own a car, to commute from El Cajon, or La Mess, or Escondido to meaningful employment at the fairgrounds.

In 2008 a study demonstrated direct financial benefit plus traffic/pollution bonus: In 2008 we (my wife and I in collaboration with the Service Employees International Union - SEIU) undertook a study of the workers who worked at the Thoroughbred races that year.

We documented the mileage of workers living in six communities throughout San Diego County, measuring their mileage to and from work from their home, using the Federal mileage rates (plus any parking costs if applicable) and compared that to what it would cost to take the Trolley or Sprinter to the Coaster connection to their job site. We used the rate to the Solana Beach Station for our cost calculation.
The detailed results of that study are attached.

In summary it showed that an:

- Usher from El Cajon would save $48.95 per day
- Security Guard from Vista saved 24.57
- Usher from San Carlos saved 30.88
- Security Guard from Carlsbad saved 19.30
- Usher from S.E. San Diego saved 34.91
- Usher from Coastal Chula Vista saved 29.25

A second DVD featuring Mr. Lee Hall, First Vice President of the SEIU in Los Angeles (whose office oversees the San Diego labor contracts) is also attached for your information.

This DVD also presents the testimony of current race fans that on many days turn around and go home due to the traffic, rather than continuing to the races. Their enlightening comments regarding the benefits-to-them from a direct train service are presented from their place of origin, which range from South San Diego County, to Encinitas, and Arcadia—in Los Angeles County.

Thus, with regard to “Density” the direct train connection would make it functional for persons wishing to utilize the fairground faculties to its fullest, to reside elsewhere, yet take full advantage of the Sustainable Community related events offered there.

Building Intensity: Through such an interdependent transit and fairground development designs the current density objections to what the locals refer to as “the Las Vegas-izing of the Fairgrounds” could be abated.

The fairground would develop in ways which enhanced the open space, recreational uses, and passive “greenway” developments now being proposed to “protect” the sensitive lagoon and wetland areas from the now proposed “Las Vegas-izing” developments.

Developments with a “sustainable community, building citizenship and uniting communities” perspective would enhance rather than detract from the adjacent uses.

While this might not be to the liking of the real-estate developer dominated current Fair Board, it surely would be in the best interest of the citizens of San Diego County!

Applicable policies:
First: SANDAG should do what ever is necessary to begin the detailed drawing and the environmental permitting to construct the Permanent Train stop, at the west edge of the fairgrounds north of the San Dieguito River. Please see or statement to the Ex. Com.
Second: SANDAG should oppose any alternative plans for locating a short term "temporary stop" in the middle of a residential neighborhood at the rear of the commercial developments along Jimmy Durante one-half mile south of the entrance of the fair. In addition to the distance, such a stop would require shuttle and flagmen services which likely would not be available on an ongoing basis other than at major event times – impacting negatively on the ability of workers to get to work, students to attend classes, etc.

It appears that the current developer dominated staff wants to promote this "temporary stop" simply because it is somewhat less expensive than the Permanent stop (See initial presentation to SANDAG Executive Committee referenced on page 1 and in the hope that it would fulfill the "mitigation" requirements of the impacts of new developments at the fairgrounds – the first of which will be added weeks of racing resulting from the closing of Hollywood Park racetrack.)

Third: It is a shame that the "temporary stop" proposal being advanced by the Fair staff does not intend to use federal stimulus funds, as Laura Chick, Governor Schwarzenegger’s Director of the Office of the Inspector General overseeing the use of Federal Stimulus funds has criteria for not allowing fraudulent spending of such funds, and also has a criteria for disallowing what she calls "stupid spending.” The Fair staff’s "temporary stop” proposal surely meets that criterion.

Fourth: We were impressed by the focus on local discretion presented by the representative of Solana Beach at the SANDAG Board Meeting last Friday.

I believe there was merit in her arguments, and urge that they be given full consideration.

I reserve the right to revisit this point, as such discretion would not only be beneficial to Solana Beach, but other communities as well.

I would ask that these comments, together with the attachments be make part of the record of comments posted to the Notice Of Preparation with regard to SANDAG’s reactions to SB 375.

Respectfully submitted:

Richard Eckfield
Dear Mr. Rundle,

The San Diego Chapter of the Sierra Club (SDSC) appreciates and welcomes the opportunity to submit scoping comments for the proposed Draft Environmental Impact Report (DEIR) for the 2050 Regional Transportation Plan (RTP or Plan) prepared for the San Diego Association of Governments (SANDAG) in an effort to ensure the DEIR’s compliance with the requirements of the California Environmental Quality Act (“CEQA”) (Pub. Res. Code sec 21000 et seq.) and the CEQA Guidelines (14 Cal. Code Regs. Sec 15000 et seq.) (“CEQA Guidelines”). A properly drafted EIR will ensure that both decision-makers and the public have a full opportunity to understand and analyze the Plan’s environmental impacts.

As this stage in the process, it is the SCSD intent to highlight areas where SANDAG has engaged in incomplete and/or inadequate planning methodology that would render the potential DEIR legally insufficient under CEQA. The SDSC concerns center on, compliance with SB 375, and SANDAG’s persistent adherence to the implementation of greenhouse gas inducing infrastructure--freeway and roadway expansions—rather than performance based transit infrastructure along the urban core. Emphasis should be paid to ensuring a reasonable range of well defined transportation alternatives and strategies.

The SDSC would like to acknowledge that transportation modeling presents formidable changes and recognizes SANDAG’s successful efforts in producing clearly articulated and environmentally sound RTP objectives—improving the quality of travel and livability and promoting sustainability through the three E’s social Equity, healthy Environment, and a prosperous Economy; however, SDSC feels it necessary to remind SANDAG, upfront, not to fall prey to repeating past mistakes and take all assurances to produce a legally sufficient, transit based RTP.
Serving as the region’s primary transportation planning and programming agency, SANDAG is vested with the responsibility to develop strategic plans to facilitate the region’s transportation network. The RTP is a planning document that should rely on the principles of smart growth to guide its planning methodology. It in with the smart growth concept in mind, that SANDAG can achieve the objectives of sustainability and performance mobility. This new RTP must distance itself from previous highway-oriented and automobile favored RTPs of the past. The RTP must significantly limit and critically assess the long-term impacts of expanding the region’s freeway network and instead identify methods/alternatives that facilitate concrete reduction in vehicle-miles traveled (VMT) and incentivize transit ridership.

The country if not the world has recognized the climate debate as settled; climate change is happening and our over-dependence on cars and light duty trucks plays a starring role in the problem as well as in the solution. An RTP that continues with the business-as-usual approach towards an automobile-based transportation structure is out-dated and will result in ill-fated environmental and land use outcomes, which virtually guarantees that the region will fail to meet its greenhouse gas targets. The time is now, for San Diego, to take the drastic and urgent steps necessary to reduce greenhouse gas emissions from transportation sources. What is needed is a fundamental paradigm shift with regards to driving and transit mobility.

SANDAG must not make any attempt to build its way out of roadway congestion; instead it should adhere to sound transportation planning principles and aim to achieve significant reductions in VMTs through the integrated expansion of transit infrastructure and services throughout the region. California invests considerably less than the national average on transportation facilities and spends considerably more on road and freeway maintenance. Take for example, on-road transportation in San Diego accounts for 47% of the total greenhouse gas emissions and of that percentage, 42% is from cars and light-duty trucks.

The Legislature through, The Sustainable Communities and Climate Protection Act (SB375), integrates land-use, housing and transportation planning on a regional level to provide a new tool to build sustainability and drastically reduce the percentage of greenhouse gas emission from cars and light-duty trucks. SB375 requires SANDAG, as a Metropolitan Planning Organization (MOP), to create a broader vision for growth, called a Sustainable Communities Strategy (SCS). SANDAG has the unique, albeit dubious distinction being the first MPO to include an SCS within their RTP. Through the SCS, SANDAG must lay out a plan to meet the region’s transportation, housing, economic, and environmental needs in a way that enables the region to meet the greenhouse gas emission reduction targets set by the California Air and Resources Board under AB 32 the State’s Global Warming and Solutions Act.

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1 The Environmental Protection Agency has identified ten principles of smart growth: (1) Mix land uses; (2) take advantage of compact building design; (3) Create a range of housing opportunities and choices; (4) create walkable neighborhoods; (5) foster distinctive, attractive communities with a strong sense of place; (6) preserve open space, farmland, natural beauty, and critical environmental areas; (7) strengthen and direct development towards existing communities; (8) provide a variety of transportation choices; (9) make development decisions predictable, fair, and cost effective; (10) encourage community and stakeholder collaboration in development decisions. See, http://www.epa.gov/dced/about_sg.htm
The SCS format enables SANDAG not only to achieve its sustainability goals, but also social equity by prioritizing investments in high-quality, socially equitable transit and land-use projects. The SCS is an integral part of the DEIR and must be constructed using achievable goals rooted in practical financial realities. It would be counter-productive, for both the San Diego region and future MPO’s engaging in their first SB375 planning obligations, for the SCS to fall short of sufficiently reducing GHG emission targets and opting instead to engage in an Alternative Planning Strategy (“APS”).

**What DEIR must analyze to Achieve CEQA Compliance**

The Court has identified that an EIR is “the heart of the California Environmental Quality Act.”

It is “the purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect that a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.”

SANDAG’s RTP, DEIR, must provide a range of alternatives that would feasibly attain the project’s clearly identified objectives while avoiding or substantially lessening the project’s significant impacts. The court in *Laurel Heights I*, held that “without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process…” Courts will not countenance a result that would require blind trust by the public, especially in light of CEQA’s fundamental goal that the public be fully informed as to the consequences of action by their public officials.”

The fulfillment of the DEIR’s CEQA obligations necessitates substantial evidence on which to base its conclusions as SANDAG will “not be allowed to hide behind” its failure to secure data. SDSC is committed to assisting SANDAG achieve a comprehensive CEQA document and therefore recommends a critical evaluation of the following potential impacts within the DEIR.

1. Analyze Impacts to Energy

The DEIR analysis should include the impact of the proposed RTP alternatives on energy. The CEQA statute and guidelines make clear that energy analysis is a crucial facet of an adequate EIR. “In order to assure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.” Appendix F to the CEQA Guidelines lists potential energy impacts that may be considered. Most relevant to this project are the total energy requirements of the project by fuel

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2 *Laurel Heights Improvement Ass’n v. Regents of University of California*, 47 Cal.3d 376, 392 (1988) (Laurel Heights I)

3 Pub. Res. Code sec 21061

4 See, Pub.Res.Code § 21100(b)(4); CEQA Guidelines 15126.6(a); *See, Citizens of Goleta Valley*, 52 Cal.3d at 564-65

5 47 Cal.3d 376 at 404


type and end use, total estimated daily vehicle trips to be generated by the project, and the additional energy consumed per trip by mode.

2. Environmental impacts of using a sales tax to subsidize automobile use

Subsidizing automobile use through a sales tax, in conjunction with a plan to increase highway capacity, will increase vehicle miles traveled. This will have reasonably foreseeable indirect and cumulative effects on the environment, necessitating inclusion in the DEIR. CEQA provides that reasonably foreseeable indirect impacts must be analyzed and covered within the EIR. It also requires that cumulative impact, which it defines as a impact which is created as a result of the combination of the project evaluated in the EIR together with other projects,” be studied in the EIR itself.

3. Public health impacts of a regional transportation plan

Much like the analysis of the automobile tax, the EIR must contain an assessment which quantifies or studies the risk of the proposed RTP alternatives to public health. Although a direct mandate to consider public health is not explicitly mentioned in the statute, CEQA makes numerous references to public health as a key issue, and our courts have recognized the need for public health analysis in an adequate EIR.

4. Induced traffic impacts

Induced traffic analysis should be an important component of the DEIR. CEQA clearly states that an adequate EIR shall include growth inducing impacts.

CEQA also holds that growth-inducing effects and other effects related to induced changes in the pattern of land use,” which may include or be sparked themselves by traffic patterns, are indirect or secondary effects requiring inclusion in an EIR. The analysis should include related effects on air and water and other natural systems, including ecosystems.

Tellingly, our own Fourth District of the California Court of Appeal has suggested that EIR analysis of changes in traffic patterns induced by projects has bearing on CEQA compliance: 

Because the FEIR's estimate of future traffic conditions (apart from the Project) represented a good faith and reasonable effort to analyze and disclose the combined effect that Project-induced traffic would have when cumulated with non-Project traffic loads, this aspect of the FEIR satisfied the purposes of CEQA.

While this case remains unpublished at this time, it shows the thought process and general direction our own Court has taken and is likely to follow on the matter.

5. How GHG impacts are to be Analyzed and Ultimately Mitigated


See generally Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs., 91 Cal. App. 4th 1344, 1367-71 (Cal. Ct. App. 2001) (holding that an EIR was deficient when it failed to adequately consider public health impacts).


Id.

The evaluation of GHG impacts under the CEQA rubric is of elevated significance. Consistent with section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions.” The CEQA guidelines provide recommendations for measures to mitigate GHG impacts. Measures to mitigate the significant effects of GHG emissions may include, among others: (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency’s decision; (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F; (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project’s emissions; (4) Measures that sequester GHG; (5) In the case of the adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of GHG emissions, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis. Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.

SANDAG’s Notice of Preparation provides four proposed alternatives to which the DEIR will conduct an environmental review, the required No Project Alternative and three others – (1) Intensified Land Use Distribution Alternative (ILUDA), (2) Modified Transit Alternative (MTA), and (3) Transportation Demand Management/Systems Management Alternative (TDM/SMA). The following will assess and provide comments on SANDAG’s proposed alternatives. Again, the environmental review document must include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed RTP.

**Intensified Land Use Distribution Alternative**

Under this alternative the primary focus should be placed on mass transit corridors and not transportations corridors in general. The long-term impacts of investing in high-density land use, along the urban core will be shown to achieve the necessary significant reductions in VMTs and overall GHG emissions. Focused attention should be placed on the downtown area where the infrastructure and demand are readily available. The RTP should place emphasis on developing smart growth around those transportation corridors within walking distance of significant transit stations/bus stops that provide competitive transit options. Competitive transit is defined in terms of hours of service and headway times that are comparable, if not superior, to drive times along the same routes. The majority of projects under this alternative should focus along San Diego’s established urban core, emphasizing sustainable communities and live/work scenarios, with an awareness to serving low to moderate income residents. The result of embracing an aggressive pattern of increased density and height close to public transit centers under this alternative will enable SANDAG to realize their stated RTP planning objectives while simultaneously succeed in reducing VMTs and GHG emissions. Moreover, this strategy is associated with a high likelihood of successful SCS compliance and social equity.

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15 CEQA Guidelines §15126.6(c)
16 Id.
17 CEQA Guidelines §15126.6(d)
Modified Transit Network Alternative (MTNA)

The SDSC concerns regard the MTNA surround the lack of funding constrained proposals and lack of attention paid to transit corridor connection linkages. It is not enough to forage connections between transit and land-use patterns, the various modes of transit within the overall transit infrastructure need to be interconnected. Investing in new transit and transit-related innovations will be unable to materialize increased ridership when superimposed over a disjointed transit infrastructure. The region’s current transit system is difficult and frustrated as there is no emphasis placed on how a rider is to coordinate between the various modes of transit – coaster, bus, rail, and trolley.

Transit investment will be best utilized in funding those projects that would advance a cohesive and holistic transit system along the urban core. Investing transit in this capacity is especially salient for low to moderate income residents, many of whom depend on public transit as their primary or sole means of transportation. Mixed-income transit oriented development (MITOD), another key facet of smart growth, can provide stable transit ridership, diminish income segregation, provide economic opportunities, and promote healthy and walk-able neighborhoods.

The Transportation Demand Management (TDM) Alternative

This alternative has serious perils with regards to associated environmental impacts and the inherent conflict with its ability to comply with an aggressive but achievable SCS model under SB 375. TDM encourages the use of carpool, bus pool, and other various methods to reduce bottleneck traffic congestion. This alternative is eerily similar to SANDAG’s auto-centric 2030 RTP, which was met with considerable criticism from the office of the California Attorney General and from a host of environmental groups including Save Our Forests and Ranch Lands (SOFAR) that sparked legal action. In the DEIR this alternative should be meticulously analyzed, from a long-term perspective inclusive of direct, indirect and cumulative impacts.

The most significant effects of the TDM are the induced traffic impacts. Highway improvements and additional high occupancy vehicle managed lanes are neither effective nor efficient methods of improving the performance of the region’s transportation network. Whatever congestion relief is achieved from these methods is short-lived, at most five years. This type of short-sighted planning actually tends to have the opposite result as the addition of highway capacity in a metropolitan area actually causes more traffic and induces decentralized land-use development. It has been concluded that 90% of all new highway capacity added to California’s metropolitan areas has the potential to be filled to pre-expansion capacity within 4 years.18

…Assuming that average vehicle fuel economy improves by 2.5 percent a year (an optimistic assumption, given that the average fuel economy of passenger vehicles has stagnated for decades), Sightline estimates that new vehicle travel on each lane-mile of new highway will release 83,000 tons

18 Other studies have found similar “induced traffic” effects from adding lanes to congested roads.” http://www.sightline.org/research/energy/res_pubs/analysis-ghg-roads
of CO2 over the next 50 years. Adding in energy associated with vehicle manufacture and maintenance, this total rises to approximately 90,000 additional tons of CO2 per lane mile associated with new vehicle trips on an expanded facility.\textsuperscript{19}

The increased traffic and sprawl create a host of environmental impacts, including, but not limited to: increased air pollution, loss of agricultural lands and open space, water pollution, loss of biological resources, and increased emissions of GHGs. These impacts are all included within the scope of CEQA’s indirect effects to be considered by the DEIR.\textsuperscript{20}

This alternative increases energy consumption in two significant ways. First, the CEQA guidelines for energy impacts recommends considering the total estimated daily vehicle trips to be generated by the project and the additional energy consumed per trip by mode. The TDM increases these particular energy requirements by increasing highway capacity and cars on the road. Second, the TDM alternative will require energy input for construction and widening of roads. The TDM alternative proposes expansion to all roadways within the 2030 Revenue Constrained Highway network and identifies 17 additional freeway and roadway expansions.

The fuel economy impacts with regard to road and freeway expansion projects also need to be assessed under the DEIR. Fuel economy drops off rapidly at speeds in excess of 45mph. Therefore, GHG emission increase and energy efficiency declines, when the rate of speed of an automobile increases. This a crucial impact of highway expansion projects that must be assessed in the DEIR, especially given that short-term congestion alleviation allows vehicles to increase speeds upwards of 50, 60, 70, 80 mph. It is therefore inaccurate for a highway expansion project to be justified by its alleged ability to increase travel speeds and consequently reduce emissions, the negative effects of higher speeds must be a factor in the overall feasibility assessment of the alternative. Simply, if a significant portion of what the alternative is doing increases automobile speeds from 45 mph to 70 mph, then to that extent the project is not reducing criteria air pollutants or GHGs, and is also impeding energy efficiency.

Under this alternative the SDSC supports the comments provided by Mike Bullock with regards to pricing parking and driving, and incorporate those comments by reference.

**Conclusion**

It is kindly requested that SANDAG incorporate the comments offered throughout this letter as mandated by CEQA into the 2050 RTP DEIR. The SDSC also gives its support to other comment letters that reference numerous other significant and important areas to be addressed by the DEIR, with particular emphasis on the comments provided by SOFAR regarding Urban Core Transit Planning.

Thank you for your consideration of these comments.

\textsuperscript{19} Id.

\textsuperscript{20} Pub. Res. Code §21100(b); CEQA Guidelines §15358(a)(2).
Respectfully Submitted,

[Signature]

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The San Diego Chapter of the Sierra Club is San Diego’s oldest and largest grassroots environmental organization, founded in 1948. Encompassing San Diego and Imperial Counties, the San Diego Chapter seeks to preserve the special nature of the San Diego and Imperial Valley area through education, activism, and advocacy. The Chapter has over 14,000 members. The National Sierra Club has over 700,000 members in 65 Chapters in all 50 states, and Puerto Rico.
Michael Bullock  
1800 Bayberry Drive  
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Rob Rundle, Principle Regional Planner  
San Diego Association of Governments  
401 B Street, Suite 800  
San Diego, CA 92101  

Subject: Comments Regarding Notice of Preparation – Programmatic EIR Project Description and Scope of Environmental Analysis 2050 Regional Transportation Plan, April 19th, 2010  

Dear Mr. Rundle,  

My comments will follow the headings of the April 19th document, except for my additional headings towards the end of this letter.  

Background and Overview  

Your first paragraph predicts that the RTP will integrate “land use, transportation systems, infrastructure needs, and public investment strategies within a regional smart growth framework” (emphasis added).  

That statement would be meaningful and encouraging, if SANDAG defined “smart” in a way that could be quantified. Such a definition is easy to identify, given our climate crisis and the level of our transportation-related GHG emissions.  

Unless curtailed, human-caused, CO2 emissions will amount to a self-inflicted genocide. The levels of GHG expected in 20 years will result in a 5% chance of a 14.4 degree Fahrenheit increase in the earth’s temperature and this would be an utter catastrophe and create the possibility of a devastating collapse of the human population, perhaps even to extinction1. Therefore, emissions must be reduced and stopped as soon as possible.  

On-road transportation causes 47% of the GHG emissions in San Diego; cars and light-duty trucks cause 42%2.  

Given these facts, “smart” should be defined as “VMT-reducing”. Then, if “Strategy A” reduces driving 10% more than “Strategy B”, it would be recognized as being 10% smarter. This quantification would allow strategies to be compared on their VMT-reducing efficiency. Using fleet-average, GHG-per-mile values, VMT reductions could be converted to GHG reductions. Selected strategies could go directly into the SCS where GHG reductions are summed.  

1 Scientific American, The Ethics of Climate Change, Professor John Broome, June 2008, Page 100  
These suggestions have been made to the SANDAG Board, so far, to no avail.

Regarding the second paragraph and in particular the adoption of goals, members of the public have asked SANDAG to adopt a goal of having an SCS sufficient to meet GHG target reductions. The Board and staff have ignored these requests. The most significant performance measure is GHG emissions. The “big picture of what the region hopes to achieve” should be avoidance of climate destabilization, which would cause a significant die off of the human population.

Regarding the third paragraph, our climate crisis threatens all of the goals that are mentioned there. SANDAG ignores its place and its responsibility in the world. California has led the nation and the world in designing communities that are built around the automobile. AB32 and the Governor’s companion executive order are sized so that if the entire world followed their specified reductions, our world GHG levels would peak at 450 PPM in 2050 and decline from there.\(^3\) AB32 is an obvious attempt to lead by example and to recognize our responsibility, given our high level of GHG per capita. SANDAG is tasked with producing the first RTP with an SCS. If SANDAG follows its current path, its SCS will fail to reduce GHG sufficiently. It will therefore be required to include an APS, which contains strategies that are not feasible and will not be implemented. Other MPOs will follow in taking this “path of least resistance”. As soon as SANDAG fails, countries around the world will take note that our state will not reduce GHG emissions after all and they will be less likely to reduce their emissions.

Catastrophic climate change will destroy “Quality of Travel”, “Livability” (quite literally), and “Sustainability”. “Social Equity” will be lost.

However, I am glad to see “social equity” mentioned because it is an important key to the solution to these problems, as will be shown below.

**Project Location**

I have no comments.

**Senate Bill (SB) 375**

I have no comments.

**Alternatives Analyzed in the EIR**

Regarding the “goals of the RTP”, as mentioned in the second sentence, the number one overriding goal should be to reduce the likelihood of catastrophic climate destabilization. However, the phrase, “while reducing the significant regional environmental impacts”, makes it clear that SANDAG considers the goals of its RTP to NOT INCLUDE reducing GHG\(^4\)! This is the same attitude that produced SANDAG’s last RTP, in 2007. That RTP would increase the total

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\(^3\) AB32 was sized on the misunderstanding that 450 PPM would be safe. It is now understood that any value above 350 PPM will destabilize our climate. Our current level is 390 PPM. For safety, we must reduce emissions much faster than AB32 mandates. SANDAG ignores this science.

\(^4\) It should be noted that to reduce GHG, it will be necessary to reduce driving. This will reduce air pollution, noise, sprawl, and the runoff of contaminated water. It will also reduce energy use. All these effects will move us in the direction of sustainability.
freeway-lane miles by 38% in our county, and as such, that RTP is in total contradiction with any reasonable definition of “smart”. In reaction to that RTP, SANDAG received numerous complaints, most notably from the office of the California Attorney General and from Save Our Forests and Ranch Lands (SOFAR), the organization that filed a legal complaint against SANDAG.

1. No Project Alternative

The definition of this alternative shows that the simple act of scheduling funding is sufficient for project inclusion. No DEIR is needed so clearly, negative impacts do not matter. Identification of sufficient funding is also not needed. This may or may not be in accordance with settled law and/or current rules. In any case, it needs to be challenged, because it shows total disrespect toward the primary purpose of our environmental laws, such as CEQA, which is to avoid building destructive projects if better alternatives exist.

The sentence in question, which is the second sentence of the NOP’s “No Project Alternative” paragraph, means that the I-5 widening project would be included in the No Project Alternative. However, at this time, the I-5 project does not even have a released DEIR. Also, it is not funded.

Consider the following.

1. Our state’s and our nation’s gas-tax account totals are too small to fund the needed road maintenance that they are supposed to fund\(^5\).

2. State and federal laws mandate an ever-improving, fleet-averaged mileage; meaning that VMTs will produce less and less cash flow into the gas tax accounts every year\(^6\).

These two facts mean that there is very little chance that I-5 will ever be funded.

When the day of economic reckoning comes and the state and nation adopt a comprehensive and variable (should vary by model of car, by road, by time of day, etc) road-use fee pricing systems to cover all costs, including the health and environmental costs of driving, there will be no need for even the existing lanes of I-5, let alone additional lanes.

There is another reason that assuming the I-5 project is part of the “No-Project Alternative” is unreasonable. This is based on Figure 1, which assumes that AB32 reductions will be applied to cars and light-duty trucks (the gold line), the mandated low-carbon fuel standard will be successful (the purple line), and the mandated fleet-average mileage (AB-1493, also known as “Pavely 1") will be achieved (the green line). From Figure 1, the needed driving reductions can be

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5 The 2/9/09 North County Times, reported that the Chair of the CTC wrote that the gas tax currently contributes nothing to road construction and only provides half of the money needed annually for repairs, http://www.nctimes.com/articles/2009/02/09/news/columnists/downey/z8591536f3e7332da882575510076fa1e.txt.

6 For example, see Figure 1’s AB1493 slope, showing fleet average CO2 per mile as function of year.
computed, as a function of year. These results are shown in Table 1. As shown, by 2025, we will need strategies in place to drive 4% less than we drove in the summer of 2009. Given Table 2 reductions, it would be irrational to build more lanes on I-5.

**Figure 1** Data Supporting a Calculation of Required Driving Reductions in California

![Graph showing VMT Threatens to Overwhelm Greenhouse Gas Savings From Cleaner Fuels and Vehicles]

Table 1  Required Driving Reductions in California

<table>
<thead>
<tr>
<th>Year</th>
<th>With Respect to Now 2</th>
<th>With Respect to BAU 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>-8%</td>
<td>16%</td>
</tr>
<tr>
<td>2025</td>
<td>4%</td>
<td>32%</td>
</tr>
<tr>
<td>2030</td>
<td>11%</td>
<td>43%</td>
</tr>
<tr>
<td>2035</td>
<td>20%</td>
<td>52%</td>
</tr>
</tbody>
</table>

**Notes:**

2July 1, 2009  
3Business As Usual for the year (Caltrans)

1AB32 is based on 450 PPM, instead of 350 PPM.  
\[
\frac{450}{350} = 1.29  
\frac{350}{450} = 0.78
\]

The .78 value suggests 2020 GHG should be down 22% from 1990.

We need to drive even less than this table indicates.
Given Table 1 results, SANDAG owes voters a new ballot measure to restructure the TRANSNET tax. It is also clear that there needs to be a true "No Project" alternative, one that eliminates the I-5 widening project and any other similar roadway expansions that happen to be in "RTP2030", the RTP that was adopted in 2007.

2. **Intensified Land Use Distribution Alternative**

The words, "along existing and planned transportation corridors" should be replaced with "within walking distance of significant transit stations or significant bus stops", where "significant" is defined by hours of service and headway. The existing words support, for example, adding sprawl development along I-15, since some would claim that I-15 is a "transportation corridor"\(^7\). This alternative should be aggressive in proposing increased density and height close to significant transit. Since this is about smart growth, "smart" needs to be defined as described above ("VMT-reducing") and then smart policies should be adopted. This would include unbundling all parking costs in a way that supports full sharing. Bundled parking costs are unfair in proportion to value. If "smart" is "VMT-reducing", then so-called "free parking" (bundled cost) is "dumb".

3. **Modified Transit Network Alternative**

SANDAG, in particular David Schumacher, has been presenting unfunded proposals for significant transit improvements. However, although these plans are set 20 to 40 years in the future, there is no mention of the possibility of advanced system design. All of Mr. Schumacher's proposals are forms of existing technology.

The Coaster is a technology that was invented in the 1800s. However, its route and the potential development around its station give the system unlimited potential, if it had a modern design.

A modern design would include the following.

- Full automation of both trains and fare collection
- Headway's as short as one minute
- "Trains" available on call for 24 hours of every day
- Automatic billing of riders
- Skip-stop stations (stations are wide, but not long)

In the stations, parking policy could include the following.

- Full automation of fee collection and earnings distribution
- Earnings to round-trip, adult riders, in proportion to round trip time duration

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\(^7\) Supervisor Bill Horn, in supporting the Merriam Mountain development of 2,600 homes out along I-15, with virtually no transit existing or planned, used nearly these same words. He claimed it was "smart" growth.
• Parking offered to all drivers (not just train riders) so as to maximize earnings to reduce net cost (fare minus parking earnings) to ride, so as to maximize ridership

• Congestion pricing to ensure that parking is always available at all distances from the platform

Innovations are never mentioned, let alone considered in SANDAG's work, so far. This alternative should include the consideration of new designs and a description of how these innovations could come to be.

Since the Coaster route is a direct competitor with I-5, it is particularly useful to consider such a forward thinking technology and what it could provide. This is a request for a systems engineering first step which is to create a "requirements document" for the new design. A requirements document specifies what the system does, without any concern for how it is done. The requirement document supports a "request for proposal" (RFP) stage, where companies propose solutions and cost. The low bidder is awarded the contract for the full design. Knowledge of this systems engineering approach seems to be missing in SANDAG. With $270 M available for "smart growth incentives" SANDAG suffers from poor direction and poor vision as to what is needed. This alternative could change that.

New transit and transit-related inventions can not materialize when government doesn't understand how innovation happens and the free market incentive is shut down by current practices that make driving and parking seem artificially cheap to users.

There is a danger in this proposal. It must always be explained that none of this is feasible, unless fundamental policy changes are made in the pricing of driving and parking. As long as these costs are kept hidden and/or kept artificially low, transit can never achieve significantly less driving. The "build it and they will come" outcome rarely materializes, in the long run. Certainly if government spends large amounts of money to build and operate systems for nearly no fare, there could be significant ridership. However, such a practice is not sustainable and would eventually collapse. We are seeing that now with service cutbacks, required in part because the state refuses to consider fully pricing roads. SANDAG is at fault for never asking the state to consider how roads should be priced fairly. All of this information needs to be included in this alternative.

4. Transportation Demand Management/Systems Management Alternative

The words "Transportation Demand Management" need to be replaced by neutral language. No one likes to have their wants, needs and "demands" managed by government policy.

Technically, this "demand" is more derived from the "supply and demand" theory, which is presented in introductory economics. However, those concepts are introduced with price being the driving factor. SANDAG seems to constantly avoid any discussion of cost or price.
Currently, SANDAG is presenting car pools and van pools as being “TDM”, without ever mentioning the cost of van pools or mentioning that “free parking” reduces wages of all workers, even those that never drive to work.

“Free parking” is both unjust and environmentally harmful. It takes money from those that drive less and gives it to those that drive more. So called “free parking” would be illegal in all circumstances, if our governments had a full awareness of this issue, cared about fairness, and understood our looming climate crisis.

It is unfortunate that the descriptor “TDM” is widely used. SANDAG needs to ignore this practice and use language that accurately describes what is being done. For example, supplying bike racks is not TDM. If car parking is being supplied and bike racks are not being supplied, supplying bike racks would more honestly be termed “FMC”, “Fairness-Motivated Change”, than “TDM”.

More importantly, “TDM” masks the reality that demand for driving is increased by so called “free parking” and the under pricing of road use. So called “free parking” reduces wages while it increases rents and the cost of many other goods and services. Parking at train station is said to be for adult riders that make round trips, but this is usually false. If it is offered at no charge, it only benefits those that park. Those that get to the station with no need to park get no benefit from the parking, even if they are adults making a round trip.

A better name for this alternative would be the “Equitable and Environmentally-Sound Pricing Alternative”, or the “EESP” Alternative. If desired, this could be an additional alternative. The primary strategies to evaluate would be the following.

1. The complete description of an equitable and environmentally-sound car parking policy. It would fully and conveniently unbundle all car-parking costs and include congestion pricing. Its methods would support shared parking in nearly all cases. This description would include congestion pricing algorithms. It would include methods to price both on-street and off-street parking. It would include a complete description of how the earnings are distributed, to include methods leading to algorithms. This description should be sufficient to support an RFP (request for proposal) process leading to full design proposals.

2. The complete description of an equitable and environmentally-sound road-use fee pricing system.

The car parking description is available in a peer-reviewed report that will be presented at the Air and Waste Management Association’s Annual Conference and exhibit, this June. A copy can be provided to SANDAG at no cost.

The principles that are important to an equitable and environmentally-sound road use fee pricing system are documented in a report available from the Sierra Club’s California Nevada Regional Conservation Committee (CNRCC). A copy can be provided to SANDAG at no cost. One set of technology to implement such a system is readily available and can be purchased from Skymeter Corporation. They have a website. They will implement the system in the Netherlands by 2014 and Denmark by 2016.
Nevada and Oregon are also considering such systems. Descriptions of their work are readily available on each state’s website.

However, there is no reason not to primarily use the most mature effort, which is the one being implemented by Skymeter. The system should conform to the principles of the CNRCC report.

SANDAG needs to model these two pricing systems. Each should be modeled alone and then they should be modeled together. There is no reason that both systems could not be fully operational by 2020.

Table 2 gives a preview of what can be expected from pricing. Each case comes from a documented, peer reviewed study it shows a 25% reduction in driving. Notice that “Group A” is composed of cases in areas with little or no public transportation. This answers critics who say that you can’t price parking until you have great transit. Since earnings are returned to all workers in proportion to the amount of time they spend at work, if nearly everyone continues to drive, the earnings will almost equal the charge and so drivers will lose very little money. On the other hand, if half of the workers get to work without driving, the drivers’ earnings will only equal about half of the charge and so their additional cost will be significant. Again, under the plan described in Item 2 above, all employees, drivers and non drivers alike, get the same earnings. However, only drivers are charged to use the parking. This charge is in direct proportion to the time that their car is in the parking lot.

<table>
<thead>
<tr>
<th>Group A: Areas with little or no public transportation</th>
<th>1995 dollars per mo.</th>
<th>Parking Use Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Century City District, West Los Angeles, 3500 employees at 100+ firms</td>
<td>$81</td>
<td>15%</td>
</tr>
<tr>
<td>Cornell University, Ithaca, NY, 9000 faculty &amp; staff</td>
<td>$34</td>
<td>25%</td>
</tr>
<tr>
<td>San Fernando Valley, Los Angeles, 1 employer, 850 employees</td>
<td>$37</td>
<td>30%</td>
</tr>
<tr>
<td>Costa Mesa, CA</td>
<td>$37</td>
<td>22%</td>
</tr>
<tr>
<td><strong>Average for Group</strong></td>
<td><strong>$47</strong></td>
<td><strong>23%</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Group B: Areas with fair public transportation</th>
<th>1995 dollars per mo.</th>
<th>Parking Use Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Los Angeles Civic Center, 10000+ employees, several firms</td>
<td>$125</td>
<td>35%</td>
</tr>
<tr>
<td>Mid-Wilshire Blvd., Los Angeles, 1 mid-size firm</td>
<td>$89</td>
<td>35%</td>
</tr>
<tr>
<td>Washington DC Suburbs, 5500 employees at 3 worksites</td>
<td>$68</td>
<td>26%</td>
</tr>
<tr>
<td><strong>Downtown Los Angeles, 5000 employees, 118 firms</strong></td>
<td><strong>$126</strong></td>
<td><strong>25%</strong></td>
</tr>
<tr>
<td><strong>Average for Group</strong></td>
<td><strong>$102</strong></td>
<td><strong>31%</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Group C: Areas with good public transportation</th>
<th>1995 dollars per mo.</th>
<th>Parking Use Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>University of Washington, Seattle WA, 50,000 faculty, staff &amp; students</td>
<td>$18</td>
<td>24%</td>
</tr>
<tr>
<td>Downtown Ottawa, Canada, 3500+ government staff</td>
<td>$72</td>
<td>19%</td>
</tr>
<tr>
<td><strong>Average for Group</strong></td>
<td><strong>$45</strong></td>
<td><strong>21%</strong></td>
</tr>
<tr>
<td><strong>Over All Average, Excluding Bellevue Washington</strong></td>
<td><strong>$45</strong></td>
<td><strong>21%</strong></td>
</tr>
</tbody>
</table>

*Parking vacancy would be higher! 2 Not used, since transit & walk/bike facilities also improved.

Table 2 References are available upon request.

Comments on SANDAG’s April 16th NOP of EIR for RTP2050, 4/28/10
To get the two pricing systems described here will require state cooperation. Road use fee systems are appropriately implemented at the state level. It is not necessary to burden either the private sector or cities with implementing the new parking system. Instead the state should implement the design and prototype installation and then, after all stakeholders are satisfied, assign a state agency to proceed with an efficient, state-wide, implementation strategy. There will need to be a state law requiring entities that are receiving the implementation to cooperate with the agency.

If the state fails to help, then these strategies will have to go in the APS. However, it is important that SANDAG fully define these systems and map out a path for state implementation.

SANDAG should be aware of the importance of pricing. The only study on how to meet San Diego GHG reductions, assuming AB32 reductions are required in the car and light duty truck sector, needed to assume that all employers in San Diego County, with at least 100 employees, adopted significant cash-out programs.

n. Bicycle Alternative

This alternative could be included in the “Equitable and Environmentally-Sound Pricing Alternative”, or the “EESP” Alternative” alternative, which may or may not be an additional alternative. It could also be included in your current “Alternative 4” Alternative (TDM/TSM), a mediocre alternative to use not much more than van pools and car pools. It could also be considered with the “No Build” alternative. Finally, it could be considered as its own alternative.

The criteria for spending money for bicycle transportation should be to maximize the resulting estimated reductions in driving. In other words, the strategy should be “smart” where “smart” means “VMT-reducing”. The following strategies will probably be the best ways to spend the $270 M allocated for bicycle transportation.

Projects

Each of the smart growth place types, both existing and planned, shown in SANDAG’s Smart Growth Concept Map, viewable at [http://www.sandag.org/programs/land_use_and_regional_growth/comprehensive_land_use_and_regional_growth_projects/RCP/region.pdf](http://www.sandag.org/programs/land_use_and_regional_growth/comprehensive_land_use_and_regional_growth_projects/RCP/region.pdf), should be checked to see if bicycle access could be substantially improved with either a traffic calming project, a “complete streets” project, more shoulder width, or a project to overcome some natural or made-made obstacle. An example is a bicycle bridge over I-5 to connect the “West of I-5” section of Vista Way with the “East of I-5” segment of Vista Way in Oceanside. This was a complete bicycle/pedestrian route before I-5 blocked it.

These projects should be prioritized using a cost/benefit ratio metric. It is hereby assumed that 40% of the $270M available for the Regional Bicycle Plan should be used to fund these projects. They should be selected for implementation, from top of the list (lowest cost/benefit ratio) down, until the money (about $110M) is used up.
Education

The remaining 60% of the $270M, about $160M, should be used to
1.) teach interested adults about bicycle accident statistics (most serious injuries
occur to cyclists in accidents that do not involve a motor vehicle), car-bike
accident statistics (most are caused by wrong-way riding and errors in
intersections; clear cut hit-from-behind is rare), and how to ride in all conditions,
to minimize problems.

2.) teach riding-in-traffic skills and how to ride in other challenging conditions, by
having the class members and instructor go out into real conditions and ride
together, until proficiency is achieved.

Students that pass a rigorous written test and demonstrate proficiency in traffic
and other challenging conditions are paid for their time and effort.

These classes should be based on the curriculum developed by the League of
American Bicyclists and taught by instructors certified by the League.

Assuming a class size of 3 riders per instructor and that each rider passes both
tests and earns $100 and that the instructor, with overhead, costs $500 dollars,
for a total of $800 for each 3 students, means that the $160M could educate
$160M/$800 = 200,000 classes of 3 students, for a total of 600,000 students.
This is about 20% of the population of San Diego County.

In Closing

Please feel free to call me to discuss any of this information.

Regards,

Mike Bullock
1800 Bayberry Drive
Oceanside, Ca 92054
760-754-8025
La Jolla Democratic Club’s Urban Policy Team, Transportation
Michael Bullock  
1800 Bayberry Drive  
Oceanside, CA 92054

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

Via E-mail

Subject: Comments Regarding Notice of Preparation – Programmatic EIR Project Description and Scope of Environmental Analysis 2050 Regional Transportation Plan, April 19th, 2010

Dear Mr. Rundle,

My comments will follow the headings of the April 19th document, except for my additional headings towards the end of this letter.

Background and Overview

Your first paragraph predicts that the RTP will integrate “land use, transportation systems, infrastructure needs, and public investment strategies within a regional **smart** growth framework” (emphasis added).

That statement would be meaningful and encouraging, if SANDAG defined “smart” in a meaningful and useful way that could be quantified. Such a definition is easy to identify, given our climate crisis and the level of our transportation-related GHG emissions.

Unless curtailed, human-caused, C02 emissions will amount to a self-inflicted genocide. The levels of GHG expected in 20 years will result in a 5% chance of a 14.4 degree Fahrenheit increase in the earth’s temperature and this would be an utter catastrophe and create the possibility of a devastating collapse of the human population, perhaps even to extinction¹. Therefore, emissions must be reduced and stopped as soon as possible.

On-road transportation causes 47% of the GHG emissions in San Diego; cars and light-duty trucks cause 42%².

Given these facts, “smart” should be defined as “VMT-reducing”. Then, if “Development A” reduces driving 10% more than “Development B”, it would be 10% smarter. This quantification would also allow strategies to be compared on their VMT-reducing efficiency. Using fleet-average, GHG-per-mile values, VMT

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¹ *Scientific American, The Ethics of Climate Change*, Professor John Broome, June 2008, Page 100

reductions could be converted to GHG reductions. Selected strategies could go directly into the SCS where GHG reductions are summed.

These suggestions have been made several times to the SANDAG Board. See References 2, 3, and 4. Since “smart growth” is supposed to be an environmental mitigation and since SANDAG refuses to quantify it, this refusal amounts to a gross negligence on the part of the SANDAG Directors.

Regarding the second paragraph and in particular the adoption of goals, members of the public have asked SANDAG to adopt a goal of having an SCS sufficient to meet GHG target reductions. The Board and staff have ignored these requests. The most significant performance measure is GHG emissions. The “big picture of what the region hopes to achieve” should be avoidance of climate destabilization, which would cause a significant die off of the human population.

Regarding the third paragraph, our climate crisis threatens all of the goals that are mentioned there. SANDAG ignores its place and its responsibility in the world. California has led the nation and the world in designing communities that are built around the automobile. AB32 and the Governor’s companion executive order are sized so that if the entire world followed their specified reductions, our world GHG levels would peak at 450 PPM in 2050 and decline from there. AB32 is an obvious attempt to lead by example and to recognize our responsibility, given our high level of GHG per capita. SANDAG is tasked with producing the first RTP with an SCS. If SANDAG follows its current path, its SCS will fail to reduce GHG sufficiently. It will therefore be required to include an APS, which contains strategies that are not feasible and will not be implemented. Other MPOs will follow in taking this “path of least resistance”. As soon as SANDAG fails, countries around the world will take note that our state will not reduce GHG emissions significantly as AB32 suggested and they will be less likely to reduce their emissions. Catastrophic climate change will destroy “Quality of Travel”, “Livability” (quite literally), and “Sustainability”. “Social Equity” will be lost.

However, it is good that “social equity” is mentioned. “Social equity” is an important key to the solution to these problems, as will be shown below.

**Project Location**

I have no comments.

**Senate Bill (SB) 375**

I have no comments.

**Issues Addressed in the EIR**

The list looks complete. However, SANDAG typically does a poor job at “Socioeconomics/Environmental Justice.

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3 AB32 was sized on the misunderstanding that 450 PPM would be safe. It is now understood that any value above 350 PPM will destabilize our climate. Our current level is 390 PPM. For safety, we must reduce emissions much faster than AB32 mandates. SANDAG ignores this science.
1.) There can be no justice if we cause a significant die off of the human population due to our destabilizing our climate. SANDAG never mentions this.

2.) The inequity of subsidized driving and parking is never mentioned by SANDAG. Perhaps this is true because the Staff does not want to displease the Directors, who favor a system that takes money from those that drive less and gives it to those that drive more.

Please elaborate on these two critical issues in your EIR and model the result of the full cost pricing of road use the unbundling of parking cost.

Alternatives Analyzed in the EIR

Regarding the “goals of the RTP”, as mentioned in the second sentence, the most important goal should be to reduce the likelihood of catastrophic climate destabilization. However, the phrase, “while reducing the significant regional environmental impacts”, indicates that SANDAG does not consider reducing GHG a goal of its RTP\(^4\). This is the same attitude that produced SANDAG’s last RTP in 2007. That RTP would increase the total freeway-lane miles by 38% in our county, and therefore, that RTP is not “smart” by any reasonable definition of the word, such as “VMT reducing”. In reaction to that RTP, SANDAG received numerous complaints, most notably from the office of the California Attorney General and from Save Our Forests and Ranch Lands (SOFAR), the organization that filed a legal complaint against SANDAG.

1. **No Project Alternative**

The definition of this alternative (“For this EIR, the No Project Alternative is defined as a transportation network that includes those projects that have already received funding, are scheduled for funding, and/or have received environmental clearance”) shows that the simple act of scheduling funding is sufficient for project inclusion. No DEIR is needed so clearly, negative impacts do not matter to SANDAG. Identification of sufficient funding is also not needed. This may or may not be in accordance with settled law and/or current rules. In any case, it needs to be challenged, because it shows a total disrespect toward the primary purpose of our environmental laws, such as CEQA, which is to avoid building destructive projects if better alternatives exist.

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Consider the following.

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\(^4\) It should be noted that to reduce GHG, it will be necessary to reduce driving. This will reduce air pollution, noise, sprawl, and the runoff of contaminated water. It will also reduce energy use. All these effects will move us in the direction of sustainability.
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2. State and federal laws mandate an ever-improving, fleet-averaged mileage; meaning that VMTs will produce less and less cash flow into the gas tax accounts every year\(^6\).

These two facts mean that there is very little chance that I-5 will ever be funded.

When the day of economic reckoning comes and the state and nation adopt a comprehensive and variable (should vary by model of car, by road, by time of day, etc) road-use fee pricing system to cover all costs, including the health and environmental costs of driving, there will be no need for even the existing lanes of I-5, let alone additional lanes. This is because our governments will find that they can no longer afford to make it artificially cheap to drive by taking money from taxes that are unrelated to driving, such as sales tax, property tax, and income tax.

There is another reason that assuming the I-5 project is part of the “No-Project Alternative” is unreasonable. This is based on Figure 1, which assumes that AB32 reductions will be applied to cars and light-duty trucks (the gold line), the mandated low-carbon fuel standard will be successful (the purple line), and the mandated fleet-average mileage (AB-1493, also known as “Pavely 1”) will be achieved (the green line). From Figure 1, the needed driving reductions can be computed, as a function of year. These results are shown in Table 1. As shown, by 2025, we will need strategies in place to drive 4% less than we drove in the summer of 2009. Given Table 2 reductions, it would be irrational to build more lanes on I-5.

Given Table 1 results, SANDAG owes voters a new ballot measure to restructure the TRANSNET tax. It is also clear that there needs to be a true “No Project” alternative, one that eliminates any and all I-5 widening projects and any and all other similar roadway expansion projects that happen to be in “RTP2030”, the RTP that was unfortunately adopted in 2007.

2. **Intensified Land Use Distribution Alternative**

The words, “along existing and planned transportation corridors” should be replaced with “within walking distance of significant transit stations or significant bus stops”, where “significant” is defined by hours of service and headway. By 2030, “significant” could mean that hours of service per day are no less than 18 hours and headways are never more than 20 minutes. The existing words

\(^5\) The 2/9/09 North County Times, reported that the Chair of the CTC wrote that the gas tax currently contributes nothing to road construction and only provides half of the money needed annually for repairs. 
http://www.nctimes.com/articles/2009/02/09/news/columnists/downey/z8591536f3e7332da882575510076fa1e.txt

\(^6\) For example, see Figure 1’s AB1493 slope (in green), showing fleet average CO2 per mile as function of year.
support, for example, adding sprawl development along I-15, since some would claim that I-15 is a “transportation corridor”\(^7\). This alternative should be aggressive in proposing increased density and height close to significant transit. Since this is about smart growth, “smart” needs to be defined as described above (“VMT-reducing”) and then smart policies should be adopted. This would include unbundling all parking costs in a way that supports full sharing. Bundled parking costs are unfair in proportion to value. If “smart” is “VMT-reducing”, then so-called “free parking” (bundled cost) is “dumb”. Since Coaster stations need to support smart growth, the Coaster service will probably need to be redesigned or at least upgraded. For this to be feasible, a new ballot measure is needed to reconfigure the TRANSNET Tax to fund Coaster redesign or upgrade.

**Figure 1**  Data Supporting a Calculation of Required Driving Reductions in California

![Figure 1: Increasing VMT Threatens to Overwhelm Greenhouse Gas Savings From Cleaner Fuels and Vehicles](image)

**Table 1**  Required Driving Reductions in California

### 3. Modified Transit Network Alternative

SANDAG, in particular David Schumacher, has been presenting largely unfunded proposals for significant transit improvements. Although these plans are set 20 to 40 years in the future, there is no mention of the possibility of advanced system design. All of Mr. Schumacher’s proposals are forms of existing technology.

\(^7\) Supervisor Bill Horn, in supporting the Merriam Mountain development of 2,600 homes out along I-15, with virtually no transit existing or planned, used nearly these same words. He claimed it was “smart” growth.
The Coaster is a technology that was invented in the 1800s. However, its route and the potential development around its station give the system unlimited potential, if it had a modern design.

A modern design would include the following.

- Full automation of both trains and fare collection
- Headway’s as short as one minute
- “Trains” available on call for 24 hours of every day
- Automatic billing of riders
- Skip-stop stations (stations are wide, but not long)

In the stations, parking policy could include the following, so that ridership is maximized, instead of maximizing driving to the station.

- Full automation of fee collection and earnings distribution
- Earnings to round-trip, adult riders, in proportion to round trip time duration
- Parking offered to all drivers (not just train riders) so as to maximize earnings to reduce net cost (fare minus parking earnings) to ride, so as to maximize ridership
- Congestion pricing to ensure that parking is always available at all distances from the platform

Innovations are never mentioned, let alone considered in SANDAG’s work, so far. This alternative should include the consideration of the new design features, as itemized above, and a description of how these innovations could come to be. Figure 2 is meant to inspire SANDAG to consider the possibilities.
Since the Coaster route is a direct competitor with I-5, it is particularly useful to evaluate such a forward thinking technology and what it could provide. This is a request for a systems engineering first step which is to create a “requirements document” for the new design. A requirements document specifies what the system does, without any concern for how it is done. The requirement document supports a “request for proposal” (RFP) stage, where companies propose solutions and cost. The low bidder is awarded the contract for the full design. Knowledge of this systems engineering approach seems to be missing in SANDAG. With $270 M available for “smart growth incentives” SANDAG suffers from poor direction and poor vision as to what is needed. This alternative could change that.

New transit and transit-related inventions can not materialize when government doesn’t understand how innovation happens and the free market incentive is shut down by current practices that make driving and parking seem artificially cheap to users.

There is a danger in this proposal. It must always be explained that none of this is feasible, unless fundamental policy changes are made in the pricing of driving and parking. As long as these costs are kept hidden and/or kept artificially low, transit can never achieve significantly less driving. The “build it and they will
come” outcome rarely materializes, in the long run, because parking and driving are being kept artificially cheap. Certainly if government spends large amounts of money to build and operate systems for nearly no fare, there could be significant ridership. However, such a practice is not sustainable and would eventually collapse. We are seeing that now with service cutbacks, required in part because the state refuses to consider fully pricing roads. SANDAG is at fault for never asking the state to consider how roads should be priced fairly. All of this information needs to be included in this alternative.

Since an updated Coaster design and operation must be considered, it follows that the so-called “Commuter Rail” alternative of Reference 5 must be considered. Although this is expensive, it may be that by reducing the travel time between Oceanside and San Diego, this will eliminate the need to build I-5, saving billions of dollars.

Areas connected with transit service such that transit travel times are competitive with driving travel times should be maximized.

4. Transportation Demand Management/Systems Management Alternative

The words “Transportation Demand Management” need to be replaced by neutral language. No one likes to have their wants, needs and “demands” managed by government policy.

Technically, this “demand” is more derived from the “supply and demand” theory, which is presented in introductory economics. However, those concepts are introduced with price being the driving factor. SANDAG seems to consistently avoid any discussion of cost or price.

Currently, SANDAG is presenting car pools and van pools as being “TDM”, without ever mentioning the cost of van pools or mentioning that heavily subsidized parking reduces wages of all workers, even those that never drive to work.

Heavily subsidized parking is both unjust and environmentally harmful. It takes money from those that drive less and gives it to those that drive more. Subsidized parking would be illegal in all circumstances, if our governments had a full awareness of this issue, cared about fairness, and understood our looming climate crisis.

It is unfortunate that the descriptor “TDM” is widely used. SANDAG needs to ignore this practice and use language that accurately describes what is being done. For example, supplying bike racks is not TDM. If car parking is being supplied and bike racks are not being supplied, supplying bike racks would more honestly be termed “FMC”, “Fairness-Motivated Change”, than “TDM”.

More importantly, “TDM” masks the reality that the demand for driving is increased by subsidized road use. Subsidized parking reduces wages while it increases rents and the cost of many other goods and services. Parking at train station is said to be for adult riders that make round trips, but this is usually false. If it is offered at no charge, it only benefits those that park. Those that get to the
station with no need to park get no benefit from the parking, even if they are adults making a round trip.

A better name for this alternative would be the “Equitable and Environmentally-Sound Pricing Alternative”, or the “EESP” Alternative. If desired, this could be an additional alternative. The primary strategies that would need to be evaluated are the following.

1. The complete description of an equitable and environmentally-sound car parking policy. It would fully and conveniently unbundle all car-parking costs and include congestion pricing. Its methods would support shared parking in nearly all cases. This description would include congestion pricing algorithms. It would include methods to price both on-street and off-street parking. It would include a complete description of how the earnings are distributed, to include methods leading to algorithms. This description should be sufficient to support an RFP (request for proposal) process leading to full design proposals. Reference 1 is such a document.

2. The complete description of an equitable and environmentally-sound road-use fee pricing system.

Reference 1 a peer-reviewed report that will be presented at the Air and Waste Management Association’s Annual Conference and exhibit, this June.

The principles that are important to an equitable and environmentally-sound road use fee pricing system are documented in a report available from the Sierra Club’s California Nevada Regional Conservation Committee (CNRCC). A copy can be provided to SANDAG at no cost. One set of technology to implement such a system is readily available and can be purchased from Skymeter Corporation. They have a website. They will implement the system in the Netherlands by 2014 and Denmark by 2016.

Nevada and Oregon are also considering such systems. Descriptions of their work are readily available on each state’s website.

However, there is no reason not to primarily use the most mature effort, which is the one being implemented by Skymeter. The system should conform to the principles of the CNRCC report.

SANDAG needs to model these two pricing systems. Each should be modeled alone and then they should be modeled together. There is no reason that both systems could not be fully operational before 2020.

Table 2 gives a preview of what can be expected from pricing. Each case comes from a documented, peer-reviewed study. It shows a 25% reduction in driving. Notice that “Group A” is composed of cases in areas with little or no public transportation. This answers critics who say that you can’t price parking until you have great transit. Since earnings are returned to all workers in proportion to the amount of time they spend at work, if nearly everyone continues to drive, the earnings will almost equal the charge and so drivers will lose very little money.

8 Table 2 References are available upon request.
On the other hand, if half of the workers get to work without driving, the drivers’ earnings will only equal about half of the charge and so their additional cost will be significant. Again, under the plan described in Item 1 above, all employees, drivers and non drivers alike, get the same earnings. However, only drivers are charged to use the parking. This charge is in direct proportion to the time that their car is in the parking lot.

SANDAG should be aware of the importance of pricing. The only study on how to meet San Diego GHG reductions, assuming AB32 reductions are required in the car and light duty truck sector, needed to assume that all employers in San Diego County, with at least 100 employees, adopted significant cash-out programs (http://www.sandiego.edu/epic/ghgpolicy/)

Table 2  Driving Reductions as a Function of Parking Pricing

<table>
<thead>
<tr>
<th>Location</th>
<th>Scope</th>
<th>1995 dollars per mo.</th>
<th>Parking Use Decrease¹</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Group A: Areas with little or no public transportation</strong></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Century City District, West Los Angeles</td>
<td>3500 employees at 100+ firms</td>
<td>$31</td>
<td>15%</td>
</tr>
<tr>
<td>Cornell University, Ithaca, NY</td>
<td>9000 faculty &amp; staff</td>
<td>$34</td>
<td>26%</td>
</tr>
<tr>
<td>San Fernando Valley, Los Angeles</td>
<td>1 employer, 850 employees</td>
<td>$37</td>
<td>30%</td>
</tr>
<tr>
<td>Costa Mesa, CA</td>
<td></td>
<td>$37</td>
<td>22%</td>
</tr>
<tr>
<td>Average for Group</td>
<td></td>
<td>$47</td>
<td>23%</td>
</tr>
<tr>
<td><strong>Group B: Areas with fair public transportation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Los Angeles Civic Center</td>
<td>10000+ employees, several firms</td>
<td>$125</td>
<td>38%</td>
</tr>
<tr>
<td>Mid-Wilshire Blvd., Los Angeles</td>
<td>1 mid-size firm</td>
<td>$89</td>
<td>38%</td>
</tr>
<tr>
<td>Washington DC Suburbs</td>
<td>5500 employees at 3 worksites</td>
<td>$88</td>
<td>26%</td>
</tr>
<tr>
<td>Downtown Los Angeles</td>
<td>5000 employees, 118 firms</td>
<td>$126</td>
<td>25%</td>
</tr>
<tr>
<td>Average for Group</td>
<td></td>
<td>$102</td>
<td>31%</td>
</tr>
<tr>
<td><strong>Group C: Areas with good public transportation</strong></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>University of Washington, Seattle WA</td>
<td>50,000 faculty, staff &amp; students</td>
<td>$18</td>
<td>24%</td>
</tr>
<tr>
<td>Downtown Ottawa, Canada</td>
<td>3200+ government staff</td>
<td>$72</td>
<td>18%</td>
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<tr>
<td>Brampton, ON</td>
<td>1 firm with 400 employees</td>
<td>$54</td>
<td>25%</td>
</tr>
<tr>
<td>Average for Group, but not Bellevue Washington</td>
<td>$45</td>
<td>21%</td>
<td></td>
</tr>
<tr>
<td><strong>Over All Average, Excluding Bellevue Washington</strong></td>
<td></td>
<td>$102</td>
<td>21%</td>
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</tbody>
</table>
| ¹Parking vacancy would be higher ²Not used, since transit & walk/bike facilities also improved.

5. Bicycle Alternative

This alternative could be included in the “Equitable and Environmentally-Sound Pricing Alternative”, or the “EESP” Alternative” alternative, which may or may not be an additional alternative. It could also be included in your current “Alternative 4” Alternative (TDM/TSM), a mediocre alternative to use not much more than van pools and car pools. It could also be considered with the “No Build” alternative. Finally, it could be considered as its own alternative.

The criteria for spending money for bicycle transportation should be to maximize the resulting estimated reductions in driving. In other words, the strategy should
be “smart” where “smart” means “VMT-reducing”. The following strategies will probably be the best ways to spend the $270 M allocated for bicycle transportation.

Projects

Each of the smart growth place types, both existing and planned, shown in SANDAG’s Smart Growth Concept Map, viewable at http://www.sandag.org/programs/land_use_and_regional_growth/comprehensive_land_use_and_regional_growth_projects/RCP/region.pdf, should be checked to see if bicycle access could be substantially improved with either a traffic calming project, a “complete streets” project, more shoulder width, or a project to overcome some natural or made-made obstacle. An example is a bicycle bridge over I-5 to connect the “West of I-5” section of Vista Way with the “East of I-5” segment of Vista Way in Oceanside. This was a complete bicycle/pedestrian route before I-5 severed it.

These projects should be prioritized using a cost/benefit ratio metric. It is hereby assumed that 40% of the $270M available for the Regional Bicycle Plan should be used to fund these projects. They should be selected for implementation, from top of the list (lowest cost/benefit ratio) down, until the money (about $110M) is used up.

Education

The remaining 60% of the $270M, about $160M, should be used to
1.) teach interested adults about bicycle accident statistics (most serious injuries occur to cyclists in accidents that do not involve a motor vehicle), car-bike accident statistics (most are caused by wrong-way riding and errors in intersections; clear cut hit-from-behind is rare), and how to ride in all conditions, to minimize problems.

2.) teach riding-in-traffic skills and how to ride in other challenging conditions, by having the class members and instructor go out into real conditions and ride together, until proficiency is achieved.

Students that pass a rigorous written test and demonstrate proficiency in traffic and other challenging conditions are paid for their time and effort.

These classes should be based on the curriculum developed by the League of American Bicyclists and taught by instructors certified by the League.

Assuming a class size of 3 riders per instructor and that each rider passes both tests and earns $100 and that the instructor, with overhead, costs $500 dollars, for a total of $800 for each 3 students, means that the $160M could educate $160M/$800 = 200,000 classes of 3 students, for a total of 600,000 students. This is about 20% of the population of San Diego County.

6.) The “Proposed Project” Alternative
This alternative is not worth studying. It is reckless and unacceptable because it will increase VMT significantly. If you study this alternative, please do not underestimate its effect to both induce sprawling development and increase VMT even if growth were fixed. This second effect is because additional highway lanes cause people to choose greater-distance commutes. It also induces them to drive more often and to drive to destinations that are further away. None of this is acceptable, considering our responsibilities to set a good example for the world to follow and our responsibilities to our young people and their future children.

In Closing

Please feel free to call me to discuss any of this information.

Regards,

Mike Bullock
1800 Bayberry Drive
Oceanside, Ca 92054
760-754-8025
La Jolla Democratic Club's Urban Policy Team, Transportation

References

1.) M. Bullock & J. Stewart, A Plan to Efficiently and Conveniently Unbundle Car Parking Costs; Paper 2010-A-554-AWMA, from the Air and Waste Management Association's 103rd Annual Conference and Exhibition; Calgary, Canada, June 21-24, 2010; available upon request from Mike Bullock, mike_bullock@earthlink.net. (Attached in email with this document, to Rob Rundle)

2.) Email, Subject: Re: SANDAG Smart Growth Incentive Programs, November 13, 2008, Bullock. (Attached in email with this document, to Rob Rundle)

3.) Comments on first Draft of “Designing for Smart Growth”, March 12, 2009, Bullock. (Attached in email with this document, to Rob Rundle)


5.) The Mid-Coast Corridor Transit Project Subsequent Environmental Impact Report, Pam Epstein for Sierra Club, emailed on June 1, 2010. (Attached in email with this document, to Rob Rundle)
Dear Mr. Rundle,

The project title "Programmatic Environmental Impact Report for the 2050 Regional Transportation Plan" is truly a bureaucratic creation. It really reflects the seventeen impacts given in the "Issues Addressed" in the EIR. But all this really does nothing to address the problems facing any business.

The significant essence is marketability. At SANDAG, it is a field totally unknown. At SANDAG, the conditions clearly indicate that at the heart of its operations is a concern about only the interests of the participants. The legislators are concerned with securing their futures. The management, in turn, realizes that it is the legislators that must be appeased, not the public. Yet, it is the citizen's satisfaction with SANDAG's observance of marketability that produces conditions that assure a pleasing environment for the staff and politicians.

Because of the lack of a conducive environment, SANDAG is constantly faced with stressful solutions and wasteful performances. However, they do not want to face this conflict and solve it. Their only concern is personal job security.

Records indicate that SANDAG has been doing "surveys" for several years. Yet nowhere in these acts does the term marketability turn up. In truth, mass transit, which is offered to those who do not have enough income to buy their own transportation, has no marketable features. Why it's quality of service is still that of the stagecoach of two centuries ago. That is the government's service! Yet a transit system is available that can offer all the market features of the private car. I call it Rideway because it does it the right way. Nevertheless, SANDAG will not even consider it.

As noted above, SANDAG's interests are only in self-serving features that assure job security. This is progress?

Yours truly,

[Signature]

Robert J. Hoffman
May 19, 2010
5041 Guava Avenue, Apt. 320
La Mesa, California 91942-8254
(619) 589-0204

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

Dear Mr. Rundle,

Your letter of May 17th arrived today. And my answer will be short because I’ve already said the essence of your problem in an earlier response. SANDAG throughout knows nothing about marketability which is a key consideration in any business. Clearly the only concern there are projects that kept the participants employed. Whether the customer really wants any of those projects is completely ignored. Further, matters that really are of concern to the customer are never allowed to surface.

Isn’t all this what my prior communication was about. Saying more is wasting my time … and yours.

Yours truly,

Robert J. Hoffman
<table>
<thead>
<tr>
<th>Organization</th>
<th>Letter Author</th>
<th>Letter Date</th>
<th>Summary of Comments: Environmental Issues</th>
<th>Section/Chapter Where Addressed in EIR</th>
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<tbody>
<tr>
<td>State Organizations</td>
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<tr>
<td>California Coastal Commission (CCC)</td>
<td>Gabriel Buhr, Coastal Program Analyst III</td>
<td>5/19/2010</td>
<td>Locating future development within or near existing development with adequate public facilities is supported by Coastal Act policies. Future transportation improvements should be designed to account for predicted sea level rise extending to at least 2100. Inventory existing transportation infrastructure in order to prepare for sea level rise and to develop appropriate adaptation strategies to address these potential impacts. Public transit development that facilitates improved public coastal access is encouraged. Restrictions are placed on new development that requires projects to minimize energy consumption and vehicle miles travelled. The 2050 RTP should provide an opportunity to assess the California Coastal Trail (CCT) within the San Diego region in order to identify existing gaps and other related coastal access needs.</td>
<td>Section 4.11 Land Use Section 4.8 Global Climate Change and Greenhouse Gas Emissions Section 2.0 Project Description Section 4.14 Public Services, Utilities, and Energy Section 2.0 Project Description and 5.0 Cumulative Impacts</td>
</tr>
<tr>
<td>California Department of Fish and Game (CDFG)</td>
<td>Edmund Pert, Regional Manager, South Coast Region</td>
<td>5/17/2010</td>
<td>The SCS should include an analysis of how the RTP is consistent with NCCP plans such as the Multiple Species Conservation Plan (MSCP) and Multiple Habitat Conservation Plan (MHCP). Open space should be considered as public infrastructure as necessary as transportation, water, and dependable lands. The RTP should include specific standards and/or guidelines.</td>
<td>Section 4.4 Biological Resources Section 4.4 Biological Resources Section 4.4 Biological Resources</td>
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<tr>
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<td>goals for future projects that could impact sensitive biological areas.</td>
<td>Resources</td>
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<td>The DPEIR should clarify how the RTP relates to local jurisdictional authority on land use issues.</td>
<td>Section 4.11 Land Use</td>
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<td>The DPEIR should include an environmentally superior alternative which minimizes the direct, indirect, and cumulative effects on sensitive biological resources.</td>
<td>Section 6.0 Alternatives Analysis</td>
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<td>As part of the RTP, SANDAG/Caltrans should focus on the early acquisition of biological mitigation sites within the County to compensate for future project impacts.</td>
<td>Section 4.4 Biological Resources</td>
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<td>Note which existing transportation-related facilities would be expanded in the RTP.</td>
<td>Section 2.0 Project Description</td>
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<td>A jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DPEIR.</td>
<td>Section 4.4 Biological Resources</td>
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<td>If the 2050 RTP has the potential to compromise one or more NCCP plans in the County, then the DPEIR should include an economic impact analysis of the costs to development in the region from the potential loss of endangered/threatened species incidental take permits through the NCCP.</td>
<td>This comment is not addressed in the EIR because it is concerned with economic impacts that need not be considered in EIRs, rather than physical environmental impacts.</td>
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<td>Fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA or SAA.</td>
<td>Section 4.4 Biological Resources</td>
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<td>The DPEIR should contain a complete discussion of the purpose and need for, and description of</td>
<td>Section 2.0 Project Description. Project-specific details of</td>
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<tr>
<td>Organization</td>
<td>Letter Author</td>
<td>Letter Date</td>
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<td>Section/Chapter Where Addressed in EIR</td>
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<tr>
<td>California Department of Transportation (Caltrans), Division of Aeronautics</td>
<td>Sandy Hesnard, Aviation Environmental Specialist</td>
<td>4/28/2010</td>
<td>the proposed project, including all staging areas and access routes to the construction and staging areas.</td>
<td>staging areas and access routes are not addressed in this EIR because it is a Program EIR. These details will be addressed in later project-specific CEQA reviews.</td>
</tr>
<tr>
<td>Native American Heritage Commission (NAHC)</td>
<td>Dave Singleton, Program Analyst</td>
<td>5/5/2010</td>
<td>The RTP should address protection of airports from incompatible land uses and focus on compatibility between airports and surrounding neighbors.</td>
<td>Section 4.11 Land Use</td>
</tr>
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<td>Consult the nearest tribes and interested Native American individuals that the NAHC recommends as ‘consulting parties,’ that may have knowledge of the religious and cultural significance of the historic properties in the project area.</td>
<td>Section 4.5 Cultural Resources and Paleontology</td>
</tr>
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<td>Lead agencies should consider avoidance when significant cultural resources are discovered during the course of project planning and implementation.</td>
<td>Section 4.5 Cultural Resources and Paleontology</td>
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<td>The NAHC recommends that a Native American</td>
<td>Section 4.5 Cultural Resources and Paleontology</td>
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<tr>
<td>Public Utilities Commission (PUC)</td>
<td>Rosa Muñoz, Utilities Engineer, Rail Crossings Engineering Section, Consumer Protection and Safety Division</td>
<td>5/6/2010</td>
<td>Traffic mitigation studies should address impacts over affected rail crossings and associated proposed mitigation measures.</td>
<td>This comment is not addressed in the EIR because it is a Program EIR. Project-specific mitigation for rail crossings will be developed in later project-specific CEQA reviews.</td>
</tr>
<tr>
<td>California Regional Water Quality Control Board</td>
<td>David Barker, Supervising Engineer</td>
<td>6/16/2010</td>
<td>The PEIR should characterize the cumulative, direct, and indirect impacts to the quality of waters caused by projects, and should identify alternatives and other mitigation measures to reduce and eliminate such impacts.</td>
<td>Section 4.10 Hydrology and Water Quality</td>
</tr>
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<td>Utilize Low Impact Development (LID) stormwater design and best management practices at railway right-of-ways, park and ride lots, bus stops, transit stations, and support building areas. Include successes with incorporating planting strips for bioswales.</td>
<td>Section 4.10 Hydrology and Water Quality</td>
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<td>Include in the alternatives and mitigations analyses measures to maintain the pre-project hydrograph and an analysis of potential cumulative impacts to watershed</td>
<td>Section 4.10 Hydrology and Water Quality</td>
</tr>
<tr>
<td>Organization</td>
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<td>-------------------------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>San Diego County Regional Airport Authority</td>
<td>Ted Anasis, Manager, Airport Planning</td>
<td>6/17/2010</td>
<td>The Programmatic EIR should evaluate land use compatibility with the adopted ALUCPs. Analyze land use patterns that further concentrate population and employment densities along transportation corridors.</td>
<td>Section 4.11 Land Use</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>The Regional Aviation Strategic Plan (RASP) and Airport Multimodal Accessibility Plan (AMAP) outputs must be incorporated and referenced in the RTP and Programmatic EIR.</td>
<td>Section 4.11 Land Use; Section 4.9 Hazards and Hazardous Materials</td>
</tr>
<tr>
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<td>Destination Lindbergh should be referenced in evaluating transit station locations in the transit network alternatives.</td>
<td>Section 2.0 Project Description; Section 5.0 Cumulative Impacts</td>
</tr>
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<td>The Programmatic EIR should include analyses of the circulation and traffic impacts, including cumulative project impacts as the city-dedicated streets that serve the International Airport would also serve a potential ITC.</td>
<td>Section 4.16 Transportation and Section 5.0 Cumulative Impacts. Project-specific impacts on specific city-dedicated streets are not addressed in this EIR because it is a Program EIR. These impacts will be addressed in</td>
</tr>
</tbody>
</table>

hydrology from existing and planned development in the watershed or planning area.

Analyze the regional importance of movement corridors in and along waterbodies, the potential effect of disrupting such corridors, and the potential for enhancing such corridors through mitigation measures.

Expand the Sustainable Communities Strategy to acknowledge other important benefits of the greenhouse emission reduction targets for cars and light trucks, such as effects on stormwater runoff pollution levels.
### Summary of NOP Comment Letters

**SANDAG 2050 RTP/SCS EIR**

<table>
<thead>
<tr>
<th>Organization</th>
<th>Letter Author</th>
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<th>Summary of Comments: Environmental Issues</th>
<th>Section/Chapter Where Addressed in EIR</th>
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<tr>
<td><strong>Special Districts</strong></td>
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<td>Any potential land use alternatives that increase the demand for vehicle use and parking at or near airports should be identified and describe how the demand for vehicle parking will be served.</td>
<td>Because this EIR is a Program EIR, it does not address parking impacts for specific facilities. In addition, this EIR does not include a parking analysis because parking analysis is not required by CEQA or by the transportation impact criteria used in this EIR.</td>
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<tr>
<td><strong>Unified Port of San Diego</strong></td>
<td>John Helmer, Director of Land Use Planning</td>
<td>6/4/2010</td>
<td>The EIR should highlight how the proposed RTP policies, programs, and projects will impact lands within the District's jurisdiction.</td>
<td>Section 2.0 Project Description; Section 4.11 Land Use</td>
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<td>The EIR should clearly identify what land use and transportation network assumptions were used in areas that may impact San Diego Bay and the surrounding District tidelands.</td>
<td>Section 4.10 Hydrology and Water Quality</td>
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<td>The Chula Vista Bayfront Master Plan (CVBMP) should be considered in all land use assumptions and considerations.</td>
<td>Section 4.11 Land Use</td>
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<td>Existing railroad freight infrastructure that serves District facilities needs to be preserved, if not enhanced, to allow for growth.</td>
<td>Section 2.0 Project Description</td>
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<td>Environmental effects caused by specific improvements outlined in the San Diego International Airport (SOIA) Master Plan should be analyzed.</td>
<td>Section 5.0 Cumulative Impacts</td>
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<tr>
<td>County of San Diego, Department of Planning and Land Use</td>
<td>Eric Gibson, Director</td>
<td>6/18/2010</td>
<td>The EIR should list every Transportation Priority Project (TPP) area that meets the established criteria and analyze the most intensive use.</td>
<td>Section 2.0 Project Description</td>
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<td>The EIR should assess the transportation and circulation benefits and impacts of each alternative to each community/area type within San Diego County.</td>
<td>Section 6.0 Alternatives Analysis</td>
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<td>A discussion assessment of an improved job housing balance should be provided.</td>
<td>Section 4.13 Population and Housing</td>
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<td>The EIR should assess the revenue requirements/constraints for each of the proposed alternatives.</td>
<td>Section 2.0 Project Description</td>
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<td>The EIR should assess the consistency between the proposed 2050 RTP policies, programs, and projects, and the County's General Plan Update and/or current County policies.</td>
<td>Section 4.11 Land Use</td>
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<td>The EIR should assess the impact of the proposed RTP alternatives to commute times, vehicle miles traveled (VMT), and Levels of Service (LOS) operations from the unincorporated communities to the employment centers located in the San Diego urban region like downtown San Diego and Kearny Mesa.</td>
<td>Section 4.16 Transportation</td>
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<td>The EIR should explain the assumptions used for the areas outside the San Diego region.</td>
<td>Section 5.0 Cumulative Impacts</td>
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<td>The EIR should identify the land use and trip generation assumptions for the local Indian tribal lands, especially those with gaming facilities.</td>
<td>Section 2.0 Project Description</td>
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<td>The EIR should provide a detailed list of the projects and programs that would need to be</td>
<td>Section 6.0 Alternatives Analysis</td>
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<td>implemented under the proposed RTP alternatives.</td>
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<td>The EIR should discuss Year 2050 land use and roadway network assumptions and assess the future transportation needs of the Otay Mesa region and their importance to regional border economies.</td>
<td>Section 2.0 Project Description; Section 5.0 Cumulative Impacts</td>
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<td>The EIR should assess the impacts of the RTP alternatives to traffic safety operations for the major freeways and highways that serve the unincorporated communities such as SR67 and SR-76.</td>
<td>Section 6.0 Alternatives Analysis</td>
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<td>The project should avoid impacting existing County parks and preserves or existing or planned trails to the maximum extent feasible. If impacts are unavoidable coordination with County DPR to determine appropriate mitigation measures is requested.</td>
<td>Section 2.0 Project Description; Section 4.15 Recreation</td>
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<td>Because of the unprecedented 40-year time horizon for the 2050 RTP, the EIR should make allowance as much as possible for a variety of different future environmental, technological, and policy milieus.</td>
<td>Section 2.0 Project Description</td>
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<td>The alternatives should reflect comments from the expert Independent Transit Planning Review panel convened in 2006 to provide input to the current RTP.</td>
<td>Section 2.0 Project Description; Section 6.0 Alternatives Analysis</td>
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<td>The EIR should include an analysis of the public health outcomes of different alternatives.</td>
<td>Section 4.6 Environmental Justice</td>
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<td>At least one alternative should be considered which reflects a different scenario in terms of the economics of transportation (i.e. increased fuel costs).</td>
<td>Section 6.0 Alternatives Analysis</td>
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<td>Local Jurisdictions</td>
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<tr>
<td>Coronado</td>
<td>Barbara Denny, City of Coronado Councilwoman</td>
<td>6/25/2010</td>
<td>The city of Coronado supports increased public transit and shared transportation systems (i.e. expanded HOV lanes, park and rides, express buses) for commuters to and from Coronado.</td>
<td>Section 2.0 Project Description</td>
</tr>
<tr>
<td>National City</td>
<td>Maryam Babaki</td>
<td>6/22/2010</td>
<td>The San Diego County Air Pollution Control District has designated National City as an environmental justice community, and the RTP should focus on reducing air quality impacts. National City listed suggestions for improved traffic flow, public transit routes, and bicycle and pedestrian improvements.</td>
<td>Section 2.0 Project Description</td>
</tr>
<tr>
<td>San Marcos</td>
<td>Jerry Backoff, Planning Division Director</td>
<td>6/18/2010</td>
<td>The EIR should identify and address the capacity issues of State Route 78 with future and cumulative traffic from regional growth and identify and methods to mitigate these impacts. Traffic congestion on major regional arterials (San Marcos Boulevard/Palomar Airport Road, Rancho Santa Fe Road, Mission Road/Santa Fe Avenue, Twin Oaks Valley/San Elijo Road) from intra city cumulative traffic should also be addressed with mitigation.</td>
<td>Section 4.16 Transportation</td>
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<td>Solana Beach</td>
<td>David Ott, City Manager</td>
<td>6/9/2010</td>
<td>The PEIR should include a comprehensive analysis of potential traffic impacts for all potential TPP (Transit Priority Projects) sites.</td>
<td>This comment is not addressed in the EIR because it is a Program EIR. Project-level traffic impact analyses for TPPs will be developed in later local plan or project-specific CEQA reviews, unless they are “sustainable communities projects” that are exempt from CEQA.</td>
</tr>
<tr>
<td>California Construction and Industrial Materials Association (CalCIMA)</td>
<td>Adam Harper, Director of Policy Analysis</td>
<td>5/17/2010</td>
<td>The EIR should demonstrate the GHG emission reductions achieved by the inclusion of mineral resources within the resource land use component of its Sustainable Community Strategy (i.e. location of construction aggregate supplies within the region).</td>
<td>Section 4.8 Greenhouse Gas Emissions and Global Climate Change; Section 4.7 Geology, Soils, and Mineral Resources</td>
</tr>
<tr>
<td>California Construction and Industrial Materials Association</td>
<td>John Cloud, Chapter Chair</td>
<td>5/18/2010</td>
<td>Analysis should take into account the region’s ability to financially support any expansion of its transportation system.</td>
<td>Section 2.0 Project Description</td>
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<td>(CalCIMA) Concerned About Traffic</td>
<td>David Krough</td>
<td>6/2010</td>
<td>Long-term environmental justice analysis should be exercised.</td>
<td>Section 4.6 Environmental Justice</td>
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<td>Review LOS on existing non-upgraded versus newly upgraded key corridors.</td>
<td>This comment is not addressed in the EIR because it is a Program EIR. Corridor-level traffic impact analyses for TPPs will be developed in later project-specific CEQA reviews</td>
</tr>
<tr>
<td>MOVE San Diego</td>
<td>Elyse Lowe</td>
<td>6/17/2010</td>
<td>The two overarching themes in the RTP: &quot;Quality of Travel &amp; Livability&quot; and &quot;Sustainability&quot; must be stated clearly in the EIR's project description.</td>
<td>Section 2.0 Project Description</td>
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<td>The EIR and its technical analyses should use innovative transit models and tools that incorporate the traffic benefits of increased biking and pedestrian mode share, and market demand when determining how mode decisions are made.</td>
<td>Section 4.16 Transportation</td>
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<td>The EIR should analyze the potential impact of smart growth development on the displacement of development to other areas.</td>
<td>Section 5.0 Cumulative Impacts</td>
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<td>The EIR should analyze the effect of smart growth transit planning on public health.</td>
<td>Section 4.6 Environmental Justice</td>
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<td>The EIR should fully consider the impact of the shift from petroleum fuels to sustainable alternative fuels.</td>
<td>Fuel type is not specifically addressed in the EIR. A discussion of GHG emissions is included in Section 4.8 Greenhouse Gas Emissions and Global Climate Change</td>
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<td>The EIR should include impacts to regions outside San Diego.</td>
<td>Section 5.0 Cumulative Impacts</td>
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<td>Describe the RTP’s affect on VMT per capita and its correlation to GHG emissions.</td>
<td>Section 4.8 Greenhouse Gas Emissions and Global Climate Change</td>
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<td><strong>Pardee Homes</strong></td>
<td>Beth Fischer, Division President</td>
<td>6/10/2010</td>
<td>The EIR should address growth impeding impacts and growth displacement impacts, and any indirect impacts that may occur.</td>
<td>Section 4.13 Population and Housing</td>
</tr>
<tr>
<td><strong>Savvy Seniors,</strong></td>
<td>Richard Eckfield</td>
<td>5/17/2010</td>
<td>All consideration should be given to prioritize the construction of a permanent train stop at the Del Mar Fairgrounds.</td>
<td>Section 2.0 Project Description</td>
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<td><strong>Frugal and</strong></td>
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<td>Attractive</td>
<td>The Sierra Club, San Diego Chapter</td>
<td>Pamela Epstein, Chair, Legal Committee</td>
<td>6/18/2010 The DEIR analysis should include the impact of the proposed RTP alternatives on energy.</td>
<td>Section 4.14 Public Services and Utilities</td>
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<td>The DEIR analysis should include environmental impacts of using a sales tax to subsidize automobile use.</td>
<td>Section 4.0 Environmental Impacts</td>
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<td>The DEIR analysis should include public health impacts of a regional transportation plan.</td>
<td>Section 4.6 Environmental Justice</td>
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<td>Induced traffic analysis should be an important component of the DEIR.</td>
<td>Section 4.16 Transportation</td>
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<td>The DEIR must include sufficient analysis of the project and each alternative to determine GHG emission effects and mitigation measures for those effects.</td>
<td>Section 4.8 Greenhouse Gas Emissions and Global Climate Change; Section 6.0 Alternatives Analysis</td>
</tr>
<tr>
<td>Individuals</td>
<td>Michael Bullock (2 letters)</td>
<td>6/17/2010</td>
<td>In terms of environmental justice, the EIR should mention the inequity caused by subsidized driving and parking.</td>
<td>Section 2.0 Project Description</td>
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<td>Reducing GHG emissions must be a goal of the RTP.</td>
<td>Section 2.0 Project Description; Section 4.8 Greenhouse Gas Emissions and Global Climate Change</td>
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<td>Robert Hoffman (2 letters)</td>
<td>5/19/2010</td>
<td>Marketability of mass transit must be considered in any transit system.</td>
<td>Project 2.0 Project Description</td>
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<td>Lori Holt Pfeiler   - Escondido Mayor</td>
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<td>Dave Schumacher    - SANDAG Staff</td>
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So at the same time you're asking for substantial increases in transit networks and motives of operation, transits in terms of its subsidy being decimating as being cut back, such contradiction in visions and goals and objectives, as I see it. So I think the ball is solidly in SANDAG's court and they have to make some tough decisions as to make a change in formula, while explaining it to the public, so it's not construed as violating the public trust.

And also, SANDAG supporting a new initiative that would support only transit, since this is such a major part of the plan.
aside to expand the freeway system, widening, changing I-5 and that when you do that, it makes it easier for people to drive their cars. So I tend to think like kind of what this gentleman is talking about that when you expand the freeway system, expand the cars, you create more congestion and there's less use of public transportation trying to encourage people to hire like carpools, what's the best way to do it? But they're not going to do it, if there's no traffic on the freeway and you got a straight shot downtown, you're not going to carpool, you're not going to vanpool.

Next: David, indeed SANDAG might have to enforce behavior, the more less attractive you make using your public -- you know, your private automobile, the more attractive the alternative is.

(Whereupon SANDAG public workshop concluded.)
I, Gloria D. Mazon, C.S.R. No. 9356, hereby certify, that the foregoing statements from this public hearing were recorded true and correct to the best of my ability by electronic transcription, and supervised under my supervision.

Dated in San Diego, California, this______ day, of____________, 2010.

---------------------------------------------
Gloria D. Mazon CSR No. 9356
A-P-P-E-A-R-A-N-C-E-S

Rudy Ramirez - Chula Vista Deputy Mayor
Elisa Arias - SANDAG Staff
SANDAG PUBLIC WORKSHOP, TUESDAY, APRIL 27, 2010
AT THE LOMA VERDE RECREATION CENTER
1420 LOMA LANE, CHULA VISTA, CALIFORNIA 91911
4:00 p.m. - 7:00 p.m.

* * *

DEP. MAYOR: The one aspect that I'm hoping a transportation plan takes into account, is the availability of broadband internet, and internet speeds. There are a lot of people who think that if there were greater speeds available in many residential neighborhoods, that more people would telecommute as opposed to driving to their jobs, would work out of their home. So this is an aspect that is not directly tied to traffic, but we can understand how indirectly it does have an impact on transportation.

So how does broadband and greater speeds affect traffic and congestion, would be directing part of the study.

Thank you.

ANONYMOUS SPEAKER: Nobody mentioned the cost of what this is going to be and how it's going to get paid.

SANDAG 2050 RTP WORKSHOP

MANJEET RANU: Okay. I'm Manjeet Ranu and I'm
Vice Chair of the Carmel Valley Community Planning Board.

So I'm here to at least identify some issues that we have as a planning board, and those are the five and 56 Interchange Project, 56 widening, North Coast widening. The adequacy of the smart growth sites that are currently shown on the Adoptive Smart Growth Concept map; transit service that's lacking within the area and 56 corridor that could compliment other transit services in the area, need for bicycle routes, bicycle trails and paths. I'm concerned about the alternative that's been discussed for the highspeed rail coming down State Route 56.

And also, I am concerned about stewardship of environmental resources in that part of San Diego. And so we will continue to monitor the RTP update and provide feedback throughout, so we would appreciate being informed.

And my email is porcupineblur@gmail.com.

Thank you.

ANONYMOUS SPEAKER: Highspeed rail must

absolutely come to Qualcomm not UTC, if you want people to ride it.
 anonymous speaker: I guess with respect to the issues addressed in the EIR, I see Item No. 6, which is “Geology and Soils and Mineral Resources,” that’s included. And I think that also seismic impact ought to be included in the EIR. It’s in a way implied by geology and soils, but you could have geology and soils without ever talking about seismology, and I think seismology is important to talk about several.

And Item 16 deals with transportation generally, which is good, and I would like to add to that, that evacuation impacts in emergencies similar to the evacuation problems they had in New Orleans when Katrina hit, people couldn’t get out as quickly as they wanted to. So I think, somehow the EIR should address evacuations.

And sort of the opposite of that, is also during emergency, how do you make sure enough food and mostly food for people that don’t evacuate, how do you make sure that they can continue to eat?

And to note, just to at least to a significant extent, I think food comes by trucks to your supermarket, and so being able to get trucks in and food in during emergencies would be another, I think, important issue.

Thank you.
ANONYMOUS SPEAKER: I would just like to add concerns of bike paths that connects all the other bike paths in the area, to just make sure that there's enough, what do you call it? Like connection, that there's not bike paths that are cut off. So I would like them to be concerned with that.

I mean, since this is sort of environmental, to me, that's really important for quality of life, more than pedestrian foot bridges, nobody walks anymore; bike paths are important.

That's my opinion.

Thank you.

(Whereupon SANDAG Workshop concluded.)
I, Gloria D. Mazon, C.S.R. No. 9356, hereby certify, that the foregoing statements from this public hearing were recorded true to the best of my ability by electronic transcription, and supervised under my supervision.

Dated in San Diego, California, this _____ day, of ____________, 2010.

Gloria D. Mazon
CSR No. 9356
CARLSBAD, CALIFORNIA, STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

TAKEN ON: WEDNESDAY, APRIL 28, 2010

TAKEN AT: 6250 EL CAMINO REAL
CARLSBAD, CALIFORNIA

REPORTER: GLORIA D. MAZON.
CSR NO. 9356
A-P-E-A-R-A-N-C-E-S

ANN STEINBERGER - SANDAG STAFF
MATT HALL - CARLSBAD COUNCILMAN
HEATHER WERDICK - SANDAG STAFF
ANONYMOUS SPEAKER: Excuse me, is there land available today for 4500 units?

STAFF SPEAKER: Yes.

ANONYMOUS SPEAKER: I'm with the Envision Committee of Carlsbad and I am wondering, where the extensive financing is going to come from. How are you going to raise the money in order to fulfill your objectives? And don't you have to set aside what I would call "Emergency Funds," in case other entities within the state of California or the Federal Government demands that SANDAG come up with money to finance a much larger system? I mean, it's part of a much larger system.

Okay. All this is wonderful, but I don't know where the money is coming from in one sense. Thank you.

ANONYMOUS SPEAKER: If you drive to work or...
school, is parking priced or is the cost hidden? Those are the choices. It's either hidden or it's not hidden and it's priced. It's never free. And here you pay, you always pay fast.

Some of the problems that I've seen, have been the trolley doesn't show up on time and then I miss my Coaster connection and I have to wait like a year -- not a year, an hour. This is very inconvenient.

On the Sprinter, I've had the unlikely thing of sitting in someone's urine and then I got up at the station and there was no one to tell, "Hey, somebody, --" it was a developmentally handicap person that obviously had an accident and I didn't realize it until I sat down and my pants -- I had put all that away -- but the problem was, I understand that stuff does happen, but there was no one to tell at the station, it was early in the morning. It was like, 6:30 in the morning at the Oceanside Transit Center and there was no one to really tell. So other than that, I'm fairly happy with the transportation of the Sprinter, the Coaster and the Trolley.

I live in Oceanside, and was coming -- I have not been using it lately, before I used to use the Coaster and I was very happy with it. The problem is, you need to tell somebody so that other people don't sit in the seat and there was no way -- I just put a
newspaper, but I had to get off and had to catch another Coaster.

What about -- do you have how many frequency?
We'd like to see a frequency of how it all connects together. And I realize money is a problem, they can't do that right now, but in the future.

Anyway, it's just like, I'm back from Europe, so the mass transit, I would love to see something like that, and you wouldn't even have to use a car, but I understand, this is a completely different culture, you know, and it's just that kind of a -- what is it?

Chicken and egg situation, but we would love to see more public transportation where you don't have to use your car and you could just, you know, that would be a luxury to have, that'd be really nice.

Another concern is, We live a block-and-a-half from the bus stop, but it only arrives once an hour to take me to the Sprinter station there, which is about what, a mile-and-a-quarter away, so I have to get her up early in the morning to take me down to the Coaster. And so, I would prefer if the bus ran more frequently so that I could make it to the Sprinter and Sprinter could make it to the Coaster and Coaster make it to the Trolley, I'm trying to make the most of the transportation system and not pollute.

I drive a Hybrid, Camry. I get like, 36 miles
a gallon, but I rather not drive. If you guys would reduce the price of the Coaster, more people would get on, use the service. Their reasoning was that the rider should go down, that's why they had to raise it, because they have to somehow pay for it. But it seems like again, it's catch 22, which I think you have to make it affordable for the masses and make everything on a timetable that's convenient, and you can fill up the Coaster. You can have 20 cars on the Coaster. I know you can't accommodate that, but you could have one Coaster after another and get it filled up and the freeways would be empty.

Why don't they lower their price? I'm a senior now, I pay $45.50 for everything, but if you would for people 50-to-60, you should have it reduced another percentage, make it $90 for them and people 45-to-50 make it a lower price for them; whereas, you get older, it should be cheaper and let the youngsters, now that I'm old, have a chance.

Thank you.

(Whereupon SANDAG Workshop concluded.)

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I, Gloria D. Mazon, C.S.R. No. 9356, hereby certify, that the foregoing statements from this public hearing were recorded true to the best of my ability by electronic transcription, and supervised under my supervision.

Dated in San Diego, California, this______day, of___________, 2010.

Gloria D. Mazon
CSR No. 9356
SAN DIEGO, CALIFORNIA, STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

TAKEN ON:    MONDAY, APRIL 26, 2010
             TUESDAY, APRIL 27, 2010
             WEDNESDAY, APRIL 28, 2010
             MONDAY, MAY 3, 2010
             THURSDAY, MAY 6, 2010

REPORTED BY:  GLORIA D. MAZON
               CSR NO. 9356
A - P - P - E - A - R - A - N - C - E - S

Ron Roberts - San Diego Supervisor
Coleen Clementson - SANDAG Staff
GEORGE MOGILNER: We're happy to have this opportunity to give our comment. We hope we don't have to wait until 2050 to see it acted on.

Okay. And here it is in writing for you. I've been empowered by the Old Town Community Planning Group to present this proposal, which is detailed at cosoy.org on the internet. There's five parts to it as one solution that addresses these issues which the Community Planning Group endorses, all right? I'm not saying that this is the only solution, but they say that this is one possible solution that addresses these issues. These are the issues they want to have on the record as being concerned with.

Is that clear? Okay. Good. You can email me through contact@cosoy.org

Thank you.

ANONYMOUS SPEAKER: I believe the third one is what are the few places that people are going from
ANONYMOUS SPEAKER: What's the difference between the rapid bus transit and rapid bus?

STAFF: That's such a good question, they're fast and faster. So I think Dave can you give you a quick response.

ANONYMOUS SPEAKER: Is it kind of like a hub? Say, a bus leaves from Point Loma and goes up to UTC and then there's shuttle buses that run out in different directions?

ANONYMOUS SPEAKER: I didn't hear anything about more freeways. Does that mean the whole focus is going to be on mass transit?

SANDAG STAFF: No. That's a very good point. I didn't talk about freeways. I do have information about the freeway network.

ANONYMOUS SPEAKER: Yes, how about cost factor?

SANDAG STAFF: Cost factor, really good point.
ANONYMOUS SPEAKER: So you're only looking still at that same half cent when the economy went down, economy sale went down, the dollar.

SANDAG STAFF: Yes. So doing the projection is very difficult under that scenario, but we are looking at that.

I'll take a couple more clarifying questions in the back.

ANONYMOUS SPEAKER: What you're doing is fine, everything, you know, but I'm just curious why it seems like the people on Friars Road have like, you know, like they're brushed aside, because where I live, I have almost a mile to walk to Fashion Valley, and there's lots of seniors there, they can't walk that far and there's no transportation at all.

What about us?

SANDAG STAFF: I think that's an excellent point and that's why we want you to look at our maps and tell us those connections, so that's what Carolina and the gentleman, Dave, behind you, that's exactly what we want to hear, what's missing and I think the Supervisor brought that up too. There are things that we all like, but there are some things that are missing and so, what
are those links that we're missing?
So make sure we get that.

ANONYMOUS SPEAKER: I filled that out already.
SANDAG STAFF: Okay. Good.

ANONYMOUS SPEAKER: Thank you; yes.
I represent Tierra Santa in San Diego and I
noticed that the Tierra Santa area is not included in San
Diego. So we have one bus line that comes through but
it's very inconvenient to get to the bus stop. I have
difficulty walking.
And so, as people age, we found that in the
92124 area, that the aging is going on, and you're going
to need transportation for people who can't drive
anymore, who can't walk anymore, can't fight.

SANDAG STAFF: You raise a really good point.

ANONYMOUS SPEAKER: Is this a charrette, or is
this some other form of planning? Is this a charrette?

SANDAG STAFF: Open house.

ANONYMOUS SPEAKER: I noticed that, as opposed
to the things we only need once a month, once a week,
perhaps getting into cars is not such a big deal. I'm
not clear how we get out of the car, we still got to
drive to the transportation.

Staff: Come help us. Thank you, everybody,
very much.

ANONYMOUS SPEAKER: How did you choose this
place?

LARRY GRAFF: Let's go with my comments.
I'm President of the Board of Directors for the
Center of Social Advocacy and Program Development
Director for Able and Disabled Advocacy.
I want to focus my comments on the EIR section
dealing with social and environmental justice.
My first question is, I want to know how that's
going to be measured and specifically, whether or not
there will be a discussion in the plan or job, housing
balance to reduce congestion; issue of air quality in
lower income neighborhoods and specifically high asthma
rates in City Heights as we discussed, land use in the
EIR.

How does SANDAG propose the impacts to changes
in density by the 18 local jurisdictions that are in the
County how that affects the EIR on an ongoing basis and
how that will be addressed, public services specifically,
when you augment or build transportation systems to increase, and in average daily trips, that it's often that density in the surrounding areas will also be increased, and what has been -- what steps will be taken to address the need for public services and for affordable housing in those areas? So as you increase the economic activity, generally speaking, before housing gets shut out due to gentrification and where it goes back to job and housing.

And finally, transportation. How you measure transportation in the EIR is on regional impacts, but specifically, what will be done to address neighborhood impacts? What may be good for the region is not necessarily good for a neighborhood, so that once again, relates back to air quality and other aspects of the services, affordable housing and all that really ties into what I said in the beginning there, how the EIR will address environmental and social justice.

And those are areas I'd like to address.

Thank you.

LAWRENCE GRAFF: The speaker talked specifically about preserving world habitat and I didn't hear anything about urban habitat, and I'm concerned about that. Urban habitat should be preserved and specifically Rose Canyon. And I know the highspeed rail is considering a route through Rose Canyon.
And there's talk of taking the rails, current rails out of Rose Canyon and all for that. Rose Canyon should be further enhanced by removing the tracks and there's been possibly realigning it, so that you don't have this long loop inland, which serves no purpose and it would preserve Rose Canyon.

And I'm all for double-tracking. I think double-tracking, making more double-tracking, you take out that loop. So that's some comments.

And I haven't been over to that station yet, but the entire presentation we heard was about mass transit. And CALTRANS in the past, hasn't spent enough money on mass transit. So I want to know -- I'm going to find out how much money they're going to continue to spend on building more freeways, which is not the answer for a million-and-a-half people who are going to be in the County. There's no way you can build on that freeway to handle those people, so you have to switch the focus and make it something, like maintain the freeways, that's the only one spent on the current freeways, and you have to pour money into mass transit, that's the only way it's going to work, if it's even going to work.

I didn't get to ask this question, but MTS had to cut back service. They had to cut back on routes there. They had to cut back on hours because of operating budget, and I know that SANDAG has a lot of
money there. The only people that have any money in today's climate, and I'm guessing that this mandate prevents them from contributing to operating expenses, which is what MTS was suffering with, but they should, because she talked about serving all different levels of income, people of different levels of income and different neighborhoods. And so when you cut back on service, that hurts the people that can't afford it the least.

And so SANDAG should be able to issue emergency funds, so that MTS doesn't have to cut back on service. That's all I can think of.

PAT DRISCOLL: Okay. I was wondering if SANDAG has looked into the new type of road construction where there are no left turns. There are only U-turns and that create a faster commute, so that people don't have to wait for left turn signals. It would be perfect for a place like Friars Road or Mira Mar Road, they would turn them into much higher capacity flow through roads than they currently are, that a whole lot of money to be spent.

DON LEICHTLING: My name is Don, last name Leichtling, pronounced like the sky, lightening. I think they need a completely different outreach methodology, so they get thousands of people to
hear the information to give feedback, not just 40 or 50. And many of the people that come here are like meeting junkies, they go to all the meetings, they get in all the list, so they're getting a very skewed response; No. 1. No. 2, I think they should have a meeting where they invite people who are like sci-fi people, not with the weird uniforms, but people that are used to thinking above the box, not just outside the box, but above the box and come up with some whole new ideas, because what they're doing is, is the same old stuff, stretched out, "Oh, well, I was on the road here, we'll put in a different bus here and have two flavors there and what flavor is there," baloney. They need to get some really big thoughts if they want to do the job.

For example, they should be planning on behalf of those million people being situated by the Salton Sea way east, East County with a really, really deluxe high speed service between the Salton Sea and San Diego, like the Stadium, so the Stadium would become a hub so people could buy a house out there for 250, instead of spending five or six-hundred thousand in the city, brand new infrastructure out there, solar city. The housing would pay for their own electricity because it is really hot out there a lot. It'll be well insulated, really nice community out there but, you know, cutting edge architecture; people get on the train out there with
their lap tops, 20, 30 minutes there at the Stadium ready to do their thing in San Diego.

Okay. Maybe one stop in El Cajon, one stop at the Stadium, maybe the Stadium is the last stop or maybe one to connect with the Coaster underground tunnel, right? Boom, fast, so then all of a sudden what do we have do to? We have to plan for another half-million people over the next 40 years, piece of cake.

They take a lot of the money they would save from building new highways and start one-by-one, fixing our train structure up, and making our train structure self-supporting.

Okay. Another thing, is when they're talking about busload or people carrier, whatever they want to use, the word, they need to be thinking is “flatbed truck,” so that all these seniors -- there's a huge a wave of seniors getting ready to retire. I'm like, the leading edge of that called the "graying of America," or the "age wave." So the baby boomers are now getting close to 65, 70 retire, huge increase, right? They're all going to have mobility scooters of one form or another, electric, right? So they need to be putting in electric charge-up stations everywhere. They need to have flatbed busses that would, when the bus pulls up, the bus pulls the surface of the street, so you don't have to do the bowing. And if 10 or 20 people each and
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12 some mobility scooter gets on that bus, the seat has to
13 warp going to the ceiling or folds up or whatever, so
14 that people can drive onto the bus, the lock holds the
15 thing down so they don't get killed when the bus takes
16 off, right?
17 And they have to plan for 10 or 15 million of
18 these people in every bus stop; every bus stop, not just
19 oh, one or two, somebody is going to put the bike on the
20 front, they're dreaming. There will be hundreds of them,
21 and also, what? That if they really want people to take
22 the busses, they're going to have to be aware of how the
23 busses looks, smells and feels on the inside. They're
24 going to have to be much more like an airliner, going to
25 have to be spotless and we're going to have to figure out

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1 some way that where homeless people get on the bus,
2 during a hot day it stinks, and they want to stay on the
3 bus all day or from one end to the other, because it's
4 something to do, then people like you and me, won't mind
5 sitting next to them, because until they do that, well, I
6 think people are not going to ride the bus. For the rich
7 people, they are going to have electric cars, it's gone.
8 Another thing, lanes on the road besides the
9 gasoline power lanes, and the bus lane, they need to
10 have. And I think they should share it with the busses,
11 electric vehicles, motorcycle, scooter busses on our
12 arterial streets and on the highway, electric scooters.
I mean, electric vehicles and busses on the rapid lane. And if they were really cool, over I-15, they would put tripods, they could put a Monterail system, they would stop every five or six stops, and because they already own the land, so they could put a Monterail over 15 for the really highspeed people that want to stop at an interchange and get on the Monterail, so they could have one at Temecula and they could have one in Escondido, Rancho Bernardo, Poway, Mira Mar Road, the Stadium, boom, boom, boom, that way -- anyway, that way the wealthy people would have the option of getting on something really nice and zooming downtown without taking their car or their chauffeur. They should make a rule in the beginning, everything they do has to be solar power; every sign they put up has to be solar powered, every infrastructure thing they have to do, has to be solar powered. No more electric-grid shit, period. They should make them do it because then, it's going to spurn the industry, right? And the sun shines every day; battery technology is going to get fabulous in the next 40 years.

Another thing, so they have to solarize everything. And what they have to do is, they have to not increase density, their mantra should be to spread density, equalize density. So in other words, I live in Mid-City,
University Avenue, right? So why should they dump a lot more people in the University area, make it more crowded, when there's lots of streets nearby? They can bring those streets up to the level of University Avenue, and have real small electric powered vans, personal vans to deliver people to transportation nodes, and by doing that, they're going to provide a lot of jobs and they'll be clean transportation, because if you live close to your work, you could take one of those personal transportation things to your door, right? Like, a taxi sort of, or you could take it to a transportation center, zoom to some place and then take another one just like it from there to your office, so that's what's coming down the road.

And I think what they're doing here, is just more dog and pony for the business people and the Planners. The Planners can only eat this thing up for a year.

Anyway, so that's my thoughts on that.

And what they should do, is tell people if they want to contact you, they could look me up by my name. My website is: NP-rid.org.

ANONYMOUS SPEAKER: Again, I'm back.

First suggestion, SANDAG, we can see on a computer changes, in fact, you can click and see how the
changes are going to impact what they cost, times, lines, and in making suggestions on how to make changes in transportation structure for San Diegans.

Second thing for bikes, the No. 1 bike planning needs to consider is the speed of cars, bicyclists cannot travel the same roads where cars are going at high rates of speed. The optimal speeds for cars with bikes is 25 miles per hour, between 25 and 30 can be done, over 30, it starts to get bad and over 35 is ridiculous, it does not work. Cars need to be slow whenever there are no protected bike lanes. It has to be that way or biking is not going to work.

The other thing, look into the possibility of a new boat called an "Austal." And it was called by the Navy, the best boat design ever. It was going to be used for the Littoral, L-i-t-t-o-r-a-l combat ships. It is a rate of high speeds of 40 miles. It generates hundreds of cars, capacity for hundreds of passengers, very fuel efficient, very seaworthy. They are just getting them into development for the Navy, but they are also built for carrying cars and passengers.

And so, recreating the Oceanside to downtown highspeed boat with a more robust seaworthy reliable and economical design, may be an important possibility for people commuting from North County to San Diego.

I have one more suggestion, look into using
alleys as ways for bikes to get through bikeways through alleys; developing alleys at slow speed, 15 miles an hour with speed bumps, so that the bikes could traverse alleys in the Mid-City areas to get between places without having to interact blocked cars, and looking to develop alleys which are under, way underutilized resources, slower speeds, which is walking, biking, transportation through the congestion Mid-city area and other areas where there's congestion.

There are dozens of square miles of land that are banded to nothing but the parking and few people going in and out of their driveways, the back, they could be changed, so that they can be used as a transport. A slower transportation, resources amends for people for transportation, that is, slow bikes, walking, electric -- put electric vehicles where they would be much safer and they could get through congestion more easily than when they have to battle cars.

One suggestion, please coordinate busses with the internet, develop real time tracking of bus locations and movements via the internet and mobile devices so people can know exactly when a bus is coming and not have to rely on signs or schedules, so they'll know that if they're two busses, that if they're stuck behind each other because they got in traffic, that is not going to be there for a while, or they know one is coming or they
can go right to it, that would gain more ridership than anything else, if you make it so people can see where the busses are in real time.

And please start with the No. 2 routes and No. 11, you'll cover a lot of people and lot of territory, as those two coordinate going out to San Diego State from downtown San Diego and the Mid-City area.

ANONYMOUS SPEAKER: Vanpools, carpools. My feeling is that they're certain people that that works great for, but you could pump millions of dollars into advertising in promotion and never really make a difference for people to do it, versus the percentage of people that do it, so it's a waste of time to put much energy into that. So bicycling, that's probably a small percentage too of the population, but with a little effort, you could probably triple the number of people that bicycle. We don't have enough bikers. It takes forever to get CALTRANS to improve those and build them.

The bike trails and bike paths we have, are usually just a painted line on the road. It's dangerous to ride your bike going 50 miles an hour, some of them are steep paths, they're not maintained very well. That's three or four things that could be done to encourage people to ride their bikes.

And I think, I mean, it's obviously a very
healthy thing to do, encourage developers to put in showers and lockers at the buildings to accommodate bicycle commuters. So you know, again, with very little effort, you could triple the number of people who ride their bikes on the street, have a healthier population.

Thank you.

ANONYMOUS SPEAKER: My suggestion is that you provide -- well, my request, that there be a way for us to acquire a pass that would allow us to return and come back using that same pass kind of transfer, so that we receive a day pass instead of having to pay $5 just for a certain amount, a short distance, because it's a lot of money for me.

And also for the children, it's a lot to be paying too, like to go short distances and then come back, $5 is a lot. I can't afford it for my family. So for me, it's difficult because I take my kids to the dentist and public transportation at $5 is a lot; $7, $10. Like, $10 is what I spend going and coming back per day. I rather prefer that you would put 2.50 and then you could use the transfer method to take another bus without having to pay again.

And now, sometimes you just drive on the bus for like, 10, 15 minutes or half an hour, where the hours were marked, that method was more convenient for me and
Now it's more difficult, because it's more expensive to pay $5 to go and come back. And if I take two or three kids, then my money is $15, that's not even what we would be spending if we had a car and had to pay for gas. Because with $20, you could afford $20 a week of gas.

Thank you, very much.

Anonymous Speaker: So with the transportation,
there, we're trying to rush and we trip and we almost
fall, because we're rushing to get our tickets and we
still miss the Trolley anyway. We're elderly, so we can
fall down.

So they put the machines in between the train
tracks. They put the machine in between the train

So Bayside is a major senior, like a place
where people come in for events. And at night when
they're traveling from their living apartments to our
site, it's at night and it's inconvenient for them. It's
scary, because it's dark and the way the bus stops. And
lighting is a factor.

ANONYMOUS SPEAKER: Now, I know the MTS has
meetings in the morning; meetings in the day and morning.
They ought to have meetings in the evening like, say,
they have a meeting at 9:00 in the morning, up until 12-
noon, that's when the major of the people go to work and
go to school, why can't they have meetings in the
evenings say, maybe 6:00-to-7:00 or 8:00?

There are people who work part-time and who are
working full-time, or who work whenever they're needed, this is during the week and sometimes over the weekends, Saturday and Sunday.

Now, could they have a meeting on Saturday mornings? Say, maybe 10-to-12 or something, on

Saturday's, when people are not working? Because that way, they do get more input from the people they have missed, or that would like to come to the meeting and they can't come, because they're working during the week. So what do you think about that?

It's all in the morning. I find that officials at the MTS are very rude people. They are from the other side of the Continent, eastern part of the country, northeastern part of the country. The big shots and they only hear what they want to hear, while they have their meetings in the mornings only, from 9:00-to-12 or from 9:00-to-11, however long that meeting lasts. They need to be aware of this. There is a lot of people here in San Diego that need transportation and that cannot afford vehicles.

I had a vehicle, I know the expense that's involved and I've been using the public transportation since the 70's, what is it? The late 70s, somewhere in the middle 70s, somewhere in that area and I'm still using the public transportation. I used to use the busses seven days a week, now it's down to four days a week.
week or three days a week. And because I have physical disabilities, like last year, I had a leg injury, left leg injury, an injury in the wintertime. And this past winter, a foot injury. I had like a knot underneath my foot and I could just barely walk, you know, when I get out of bed to go to the bathroom, I could just barely walk, that's how bad it was, that's only a few feet for the bathroom.

And another thing, these people need to write more legible, instead of just pressing on computer buttons on the computer. I notice that because I don't use any of this stuff, because my time, effort, energy, it costs money. It's nice to have. If they can do it, fine. But not me, because I have too many other things I have to take care of.

Anyway, to get back to the meetings. I think the people at the MTS need to realize that there needs to be meetings in the evenings, and if they have it in the morning, they should schedule it to have it in the evening, say, maybe from 6:00; maybe to 8:00 or something, or 5:00 to 8:00, because then that's when people get off of work. Some people get off work at 4:00 or 5:00 or 6:00, then that way they could jump on over to get to the meetings and talk about changing the bus system and Trolley time schedules and all that, and/or what their plans are, because I've been to their
meetings, and it gets to the point where they just don't listen. They don't listen and not only that, but they have lost passengers.

I had one passenger that got off the transit, and this passenger told me that, she says, "You know, I am sick and tired of their changing the bus schedules and times," and because they have to work. She has to work and she can't rely on the bus system anymore or the Trolley, especially the busses and the routes.

Because like it used to be, that you could hop on the bus and get to work in no time flat, two busses at the most, now she has to take three or he has to take three, and I have to take an extra bus.

Now, like I have places to go to here in San Diego. Like, I need to go to Point Loma, University or go to Cabrillo. It used to be two busses, now I have to take three busses. Three busses.

Now, is that really necessary to take three busses? And I live right here in Linda Vista. I take the 44 to Old Town. It used to be, I'd take 28 from Old Town to Point Loma, University or Cabrillo Monument, that's two busses, now it's three, which I think is not right. I don't think it's right.

What they should do is take two busses, you know, for someone that lives in Linda Vista like me, just two busses. It used to be the 26 bus, like I would catch...
And another thing too is, is that worth it where the 26 bus would pick up a lot of people? But what they are doing is, the 28 -- no, the 84 bus is taking the scenic route and they don't pick up anybody there. It's a scenic route from Rosecrans up to Canyon Street and then they to go Chatsworth, Talbot, and then they to go Chatsworth. To me, the scenic Route bus is not a good idea, 'cause you don't pick up many people there, but you pick up people in Chatsworth, and that's where they make their mistake, MTS. Oh, I can tell you what the MTS made, but they don't listen. MTS is missing a lot of people, especially the people who are working that need to come to the meetings in their neighborhood.

The people in the neighborhood are not being informed. And every person here in San Diego needs to be informed of what time to have meetings in the evening; say, evenings from 4:00, 5:00 to 8:00 or 9:00. Anywhere between 4:00-to-9:00. If they have a meeting say, 5:00-to-8:00, that's fine.

Thank you.

(Whereupon the RTP 2050 Workshop concluded.)
STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

I, Gloria D. Mazon, C.S.R. No. 9356, hereby certify, that the foregoing statements from this public hearing were recorded true to the best of my ability by electronic transcription, and supervised under my supervision.

Dated in San Diego, California, this_____day, of__________, 2010.

__________________________
Gloria D. Mazon
CSR No. 9356
A - P - P - E - A - R - A - N - C - E - S

Lea Bush - El Cajon Collaborative
Carolina Gregor - SANDAG Staff
ANONYMOUS SPEAKER: Do we just point on it, that San Diego is the first County undertaking the SB375?

ANONYMOUS SPEAKER: Is this PowerPoint you just gave on San Diego, on the website?

SANDAG STAFF: Yes, it is available on the website, as well as materials we have at the stations.

ANONYMOUS SPEAKER: The transportation consideration for the community college in East County, is totally inadequate. The bus transportation keeps getting less and less and there's no alternative, so of course, people are forced into cars and they come and go.

The Grossmont College is 20,000 students and Cuyamaca has 10,000, so those are combined, they're bigger than San Diego State. And those students in the community colleges come and go, they don't tend to go, you know, stay all day to take classes because they're...
working, most of them are working, or have family.
And so that's one.
And I guess the other is 67 Bradley, really
needs to find construction funding adjacent to 67. Yeah,
67, it's in the pipeline, we put it in as a comment. And
I'll fill this out.

MAC MCGEE: My name is Mac McGee.
The issue is carpooling and incentives, a way
for carpooling, right now, they just talk about it.
Is there some things we could do to maybe, if
the employer had a specific place for people to park if
they carpool would be a good idea. Just like vanpool has
incentives like $400, some type of monetary or gas card
or, you know, to help with the gas or something like
that, to get people interested in carpooling, you know,
because they talk about carpooling, but why should I
carpool? What's the benefit to me?
The environment, it's understood that it's good
for the environment, especially if you're talking about
greenhouse gases, but how does the individual benefit
from that?
You need some type of incentive, so people
would want to carpool when they don't have seven people

or more to vanpool, we only have two-to-four people. You
need an incentive so they can carpool.
ANONYMOUS SPEAKER: The main thing is the completion to 67 going south. There is an exit for 8 West, but there is only 28 feet of an off-ramp and wraparound for 8 East. They're going to build four lanes of traffic into 28 feet, it's too much.

And Diane Jacob who's on the board for SANDAG, has been questioning the same thing for the last year-and-a-half and has not received, evidently, has not received a satisfactory answer either of what they're going to do. I was just told that it's a money situation, but to me it's a planning situation from the very beginning, that if you have a plan, that you plan the beginning and the end, you don't plan the beginning and two thirds and then go "Oh, well, that's it."

They have everything planned down to the Bradley Bridge. From the Bradley Bridge south to come on 8, either east or west. You got four lanes of traffic going into one lane to make the wraparound and as you get there, you got 28 feet to move over and you got three lanes of traffic coming this way (indicating), you're coming two lanes of traffic this way, and you're trying to get on, it's ridiculous.

So my opinion is, after talking with Mr. Fig, is that I know the money is tight, but they need to prioritize that the next time they have some money, is
they have to do something about figuring out 67, 8-East, and let something else wait. I'm afraid somebody is going to get killed on one of them.

And the other thing there, is they need to consider when they make this decision, is they need to consider possibly closing Mollison Street on-and-off-ramp, they are too close to the interchange of 67 and 8.

They got plenty of room to come on 2nd. They don't need Mollison. Like I told Mr. Fig, I said, "I don't moan and groan unless I've got a solution. I just don't have the money."

Thank you.

(Whereupon the 2050 RTP Workshop concluded.)
I, Gloria D. Mazon, C.S.R. No. 9356, hereby certify, that the foregoing statements from this public hearing were recorded true to the best of my ability by electronic transcription, and supervised under my supervision.

Dated in San Diego, California, this _____ day, of ____________, 2010.

__________________________
Gloria D. Mazon
CSR No. 9356