BOARD OF DIRECTORS
AGENDA

Friday, October 28, 2011
9 a.m. to 12 noon
SANDAG Board Room
401 B Street, 7th Floor
San Diego

AGENDA HIGHLIGHTS

• FINAL 2050 SAN DIEGO REGIONAL TRANSPORTATION PLAN, INCLUDING ITS SUSTAINABLE COMMUNITIES STRATEGY

• PUBLIC HEARING: FINAL REGIONAL HOUSING NEEDS ASSESSMENT PLAN FOR 2013-2020 HOUSING ELEMENT CYCLE

• 2010 REGIONAL TRANSPORTATION IMPROVEMENT PROGRAM AMENDMENT NO. 13 AND AIR QUALITY CONFORMITY ANALYSIS

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MISSION STATEMENT

The 18 cities and county government are SANDAG serving as the forum for regional decision-making. SANDAG builds consensus, makes strategic plans, obtains and allocates resources, plans, engineers, and builds public transit, and provides information on a broad range of topics pertinent to the region’s quality of life.

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ITEM #  
+1.  APPROVAL OF MEETING MINUTES  
   +A. SEPTEMBER 16, 2011, BOARD BUSINESS MEETING MINUTES  
   +B. SEPTEMBER 23, 2011, BOARD BUSINESS MEETING MINUTES  

+2.  PUBLIC COMMENTS/COMMUNICATIONS/MEMBER COMMENTS  
Public comments under this agenda item will be limited to five public speakers. Members of the public shall have the opportunity to address the Board on any issue within the jurisdiction of SANDAG that is not on this agenda. Other public comments will be heard during the items under the heading “Reports.” Anyone desiring to speak shall reserve time by completing a “Request to Speak” form and giving it to the Clerk of the Board prior to speaking. Public speakers should notify the Clerk of the Board if they have a handout for distribution to Board members. Public speakers are limited to three minutes or less per person. Board members also may provide information and announcements under this agenda item.

+3.  ACTIONS FROM POLICY ADVISORY COMMITTEES  
This item summarizes the actions taken by the Borders Committee on September 23, the Transportation and Regional Planning Committees on October 7, the Executive Committee on October 14, and the Transportation and Public Safety Committees on October 21, 2011.

CONSENT (4 through 8)  
+4.  ANNUAL MEETING CALENDAR (Kim Kawada)*  
The Board of Directors is asked to approve the calendar of meetings of the Board and the Policy Advisory Committees for the upcoming year.

+5.  PROPOSED FY 2012 BUDGET AMENDMENT: AUTOMATED REGIONAL JUSTICE INFORMATION SYSTEM INTERREGIONAL JUSTICE DATA-SHARING (Pam Scanlon)  
The Interregional Justice Data-Sharing work element utilizes grant funding from the U.S. Department of Homeland Security Urban Area Security Initiative (UASI) to develop and implement interagency information sharing projects. Recently, UASI approved a grant extension to continue funding activities for several projects initiated in FY 2011 into FY 2012 and offered ARJIS additional funding to implement new technologies and to expand on existing applications. The Public Safety Committee recommends that the Board of Directors approve an amendment to the FY 2012 Budget to increase funding by $1,086,000 from $1,367,368 to $2,453,368 for the ARJIS Interregional Justice Data-Sharing work element (3400800).
+6. REPORT SUMMARIZING DELEGATED ACTIONS TAKEN BY EXECUTIVE DIRECTOR (Lauren Warrem)*

In accordance with SANDAG Board Policy Nos. 003 (Investment Policy), 017 (Delegation of Authority), and 024 (Procurement and Contracting-Construction), this report summarizes certain delegated actions taken by the Executive Director since the last Board of Directors meeting.

+7. REPORTS ON MEETINGS AND EVENTS ATTENDED ON BEHALF OF SANDAG (Kim Kawada)

Board members will provide brief reports orally or in writing on external meetings and events attended on behalf of SANDAG since the last Board of Directors meeting.

+8. FINANCIAL MARKET STATUS AND TransNet SUBSTITUTION OF LIQUIDITY PROVIDER (Marney Cox and Lauren Warrem)*

This quarterly report is intended to keep the Board of Directors informed about the latest developments in the financial markets, the economy, and revenues, and the strategies being explored and implemented to minimize possible impacts to SANDAG. This report also provides information to the Board with respect to the recent replacement of Dexia as the underlying liquidity facility provider for a portion of the SANDAG debt program.

REPORTS (9 through 11)

+9. ITEM A. FINAL 2050 SAN DIEGO REGIONAL TRANSPORTATION PLAN, INCLUDING ITS SUSTAINABLE COMMUNITIES STRATEGY (First Vice Chair Jack Dale, Transportation Committee Chair; Heather Adamson and Rob Rundle)*

The Board of Directors is asked to: (1) approve Resolution No. 2012-08 certifying that the Final Environmental Impact Report (EIR) for the 2050 San Diego Regional Transportation Plan (2050 RTP) has been completed in compliance with the California Environmental Quality Act (Public Resource Code §21000 et seq., “CEQA”), that the Final EIR was presented to and reviewed and considered by the Board of Directors prior to approving the Project, and that the Final EIR represents the independent judgment and analysis of SANDAG, and adopting the Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program; (2) find the 2050 RTP Revenue Constrained Plan in conformance with the State Implementation Plans for air quality; (3) find that the 2050 RTP and its Sustainable Communities Strategy (SCS) meet the greenhouse gas reduction targets established by the California Air Resources Board; and (4) approve Resolution No. 2012-09 adopting the air quality conformity determination, finding that the SCS achieves the greenhouse gas reduction targets established by the CARB, and meets the requirements established by Senate Bill 375 (Steinberg, 2008) as codified in Government Code §65080(b) et seq., and adopting the 2050 RTP, including its SCS, and the Final 2050 Regional Growth Forecast.
ITEM B. PUBLIC HEARING: FINAL REGIONAL HOUSING NEEDS ASSESSMENT PLAN FOR 2013-2020 HOUSING ELEMENT CYCLE
(First Vice Chair Jack Dale; Susan Baldwin)

The Board of Directors is asked to conduct a public hearing and approve Resolution No. 2012-10 (Attachment 1), adopting the final Regional Housing Needs Assessment Plan for the 2013-2020 (fifth) housing element cycle, in substantially the same form as attached to the report.

+10. 2010 REGIONAL TRANSPORTATION IMPROVEMENT PROGRAM AMENDMENT NO. 13 AND AIR QUALITY CONFORMITY ANALYSIS
(First Vice Chair Jack Dale, Transportation Committee Chair; Michelle Merino)*

The 2010 Regional Transportation Improvement Program (RTIP) is the multiyear program of proposed major highway, arterial, transit, and bikeway projects in the San Diego region covering the period FY 2011 to FY 2015. Amendment No. 13 reflects changes to projects that have been updated as part of the Final 2050 Regional Transportation Plan (RTP) (Agenda Item No. 9A). The Transportation Committee recommends that the Board of Directors approve Resolution No. 2012-07, approving Amendment No. 13 to the 2010 RTIP, including findings that Amendment No. 13 is in conformance with the State Implementation Plans for air quality and is consistent with the 2050 RTP.

11. CONTINUED PUBLIC COMMENTS

If the five speaker limit for public comments was exceeded at the beginning of this agenda, other public comments will be taken at this time. Subjects of previous agenda items may not again be addressed under public comment.

12. UPCOMING MEETINGS

The next Board Business meetings are scheduled for Friday, November 4, 2011, at 9 a.m. and Friday, November 18, 2011, at 9 a.m. Please note that these meetings will be held on the first and third Fridays of the month due to the Thanksgiving holiday schedule.

13. ADJOURNMENT

+ next to an agenda item indicates an attachment
* next to an agenda item indicates a San Diego County Regional Transportation Commission item
BOARD OF DIRECTORS DISCUSSION AND ACTIONS

SEPTEMBER 16, 2011

Chair Jerome Stocks (Encinitas) called the meeting of the SANDAG Board of Directors to order at 10:02 a.m. The attendance sheet for the meeting is attached.

1. PUBLIC COMMENTS/COMMUNICATIONS/MEMBER COMMENTS

Mike Bullock, San Diego Chapter, Sierra Club, provided comments regarding climate change.

Clive Richard, a member of the public, provided his personal experience during the recent countywide electrical power outage.

Lorraine Leighton, a member of the public, commented on her personal experience using bus service during the recent countywide electrical power outage, and asked about having a backup generator for such an emergency in the future.

REPORTS (2 through 3)

4. STATE TRANSIT ASSISTANCE CLAIM AMENDMENT (APPROVE)

At its June 24, 2011, meeting, the Board of Directors approved the North County Transit District (NCTD) State Transit Assistance (STA) claim as part of the Transportation Development Act claim process. The State Controller’s Office has revised the FY 2012 STA apportionment, resulting in an overall increase. NCTD is seeking to amend its STA claim in order to receive the additional amount. The Board of Directors was asked to approve Resolution No. 2012-06, in substantially the same form as attached to the report, approving the STA claim amendment for NCTD.

Action: Upon a motion by Mayor Jim Desmond (San Marcos) and second by Mayor Sam Abed (Escondido), the Board of Directors approved Resolution No. 2012-06, approving the STA claim amendment for NCTD. Yes – 16 (weighted vote, 100%). No – 0 (weighted vote, 0%). Abstain – 0 (weighted vote, 0%). Absent – Chula Vista, Poway, and Vista.

2. 2050 REGIONAL TRANSPORTATION PLAN: SUMMARY OF PUBLIC COMMENTS AND PROPOSED CHANGES (ACCEPT)

First Vice Chair and Transportation Committee Chair Jack Dale (Santee) introduced this item.
Heather Adamson, Senior Planner, reported that on April 22, 2011, the Board of Directors accepted the Draft 2050 Regional Transportation Plan (2050 RTP) and its Sustainable Communities Strategy (SCS) for public distribution and comment. The public comment period for the Draft 2050 RTP and its SCS closed on July 8, 2011. She provided a summary of the comments received and an overview of the proposed changes to the Draft 2050 RTP. The Transportation Committee recommended that the Board of Directors accept the proposed modifications to the Draft 2050 RTP and its SCS, in substantially the same form as presented in the agenda report. The proposed changes will be considered in the Final 2050 RTP and its SCS, and evaluated in the Final Environmental Impact Report prior to Board adoption scheduled on October 28, 2011.

Chair Stocks noted there were several requests to speak on this item.

Jack Shu, representing the Cleveland National Forest Foundation, stated that the 2050 RTP doesn’t adequately address their concerns, especially related to the public’s support of transit versus freeways.

Mike Bullock, San Diego Chapter, Sierra Club, stated that the 2050 RTP does not do enough to make a significant positive impact to reduce greenhouse gas emissions.

John Wotzka, a member of the public, noted that the Northeast area of the United States is investing three times as much money as California in high-speed rail. Old Amtrak rail lines are being used for this purpose.

Matt Adams, Building Industry Association (BIA), complimented SANDAG staff on the development of the 2050 RTP. He said the BIA will be working with SANDAG to fulfill the region’s housing need.

Kathleen Ferrier, Walk San Diego, acknowledged the huge effort by staff on the development of the 2050 RTP, and asked that the Active Transportation component be accelerated.

Action: Upon a motion by Councilmember Carrie Downey (Coronado) and a second by Supervisor Ron Roberts (County of San Diego), the Board of Directors accepted the proposed modifications to the Draft 2050 RTP and its SCS, in substantially the same form as presented in the agenda report. Yes – 15 (weighted vote, 100%). No – 0 (weighted vote, 0%). Abstain – 0 (weighted vote, 0%). Absent – Chula Vista, Escondido, Poway, and Vista.

3. TransNet SUBSTITUTION OF LIQUIDITY PROVIDER (INFORMATION)

Lauren Warrem, Director of Finance, reported that in March 2008, SANDAG issued $600 million of long-term variable rate debt for the purposes of implementing the TransNet Early Action Program. In addition, SANDAG has a commercial paper program available for use up to $100 million. Both the long-term variable rate debt and commercial paper have underlying liquidity facilities provided by two banks, JP Morgan Chase Bank and Dexia Credit Local Bank (Dexia). The purpose of this report was to provide information to the Board of Directors with respect to replacing Dexia as the underlying liquidity facility for half of the $600 million of long-term variable rate debt and for the commercial paper program.
Barney Allison, Nossaman LLP, explained the draft disclosure documents provided to the Board of Directors were an update of previous information provided in fall 2010.

**Action:** This item was presented for information only.

5. **CONTINUED PUBLIC COMMENTS**

Chair Stocks announced that the Federal Transit Administration (FTA) has approved the Mid-Coast Corridor Transit Project’s entry into Preliminary Engineering. This milestone means that the project is officially eligible to receive FTA New Starts funding.

6. **UPCOMING MEETINGS**

The next Board Business meetings are scheduled for Friday, September 23, 2011, at 9 a.m., and Friday, October 14, 2011, at 10 a.m.

7. **ADJOURNMENT**

The meeting was adjourned at 11:03 a.m.

DGunn/M/DGU
**ATTENDANCE**

**SANDAG BOARD OF DIRECTORS MEETING**

**SEPTEMBER 16, 2011**

<table>
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<tr>
<th>JURISDICTION/ORGANIZATION</th>
<th>NAME</th>
<th>ATTENDING</th>
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<tr>
<td>City of Carlsbad</td>
<td>Matt Hall (Member)</td>
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<td>City of Chula Vista</td>
<td>Cheryl Cox (Primary)</td>
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<td>Carrie Downey (Primary)</td>
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<td>City of Del Mar</td>
<td>Carl Hilliard (Primary)</td>
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<td>Mark Lewis (Primary)</td>
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<td>City of Encinitas</td>
<td>Jerome Stocks, Chair (Primary)</td>
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<td>Sam Abed (Primary)</td>
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<td>City of Imperial Beach</td>
<td>Lorie Bragg (2nd Alt.)</td>
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<td>Art Madrid (Member)</td>
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<td>Mary Sessom (Primary)</td>
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<td>City of National City</td>
<td>Ron Morrison (Member)</td>
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<td>James Wood (Member)</td>
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<td>Don Higginson (Primary)</td>
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<td>Lorie Zapf (1st Alt.)</td>
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<td>Tony Young (Primary)</td>
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<td>Jim Desmond (Primary)</td>
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<td>City of Santee</td>
<td>Jack Dale (1st Vice Chair)</td>
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<td>City of Solana Beach</td>
<td>Lesa Heebner (Primary)</td>
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<td>City of Vista</td>
<td>Judy Ritter (Primary)</td>
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<td>County of San Diego - A</td>
<td>Bill Horn (Primary, Seat A)</td>
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<td>County of San Diego - B</td>
<td>Ron Roberts (Primary, Seat B)</td>
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<td>Caltrans</td>
<td>Laurie Berman (1st. Alt.)</td>
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<td>MTS</td>
<td>Harry Mathis (Primary)</td>
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<td>NCTD</td>
<td>Chris Orlando (Primary)</td>
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<td>Imperial County</td>
<td>Sup. John Renison (Primary)</td>
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<td>US Dept. of Defense</td>
<td>CAPT Clifford Maurer (Member)</td>
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<td>SD Unified Port District</td>
<td>Scott Peters (Member)</td>
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<td>SD County Water Authority</td>
<td>Mark Muir (Primary)</td>
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<td>Baja California/Mexico</td>
<td>Remedios Gómez-Arnau (Member)</td>
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<tr>
<td>Southern California Tribal Chairmen’s Association</td>
<td>Allen Lawson (Member)</td>
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<td></td>
<td>Edwin Romero (Member)</td>
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BOARD OF DIRECTORS DISCUSSION AND ACTIONS

SEPTEMBER 23, 2011

Chair Jerome Stocks (Encinitas) called the meeting of the SANDAG Board of Directors to order at 9:02 a.m. The attendance sheet for the meeting is attached.

1. APPROVAL OF MEETING MINUTES (APPROVE)

Action: Upon a motion by Mayor Jim Desmond (San Marcos), and a second by Mayor Lesa Heebner (Solana Beach), the SANDAG Board of Directors approved the minutes from the July 8, 2011, Board Policy meeting; July 22, 2011, Board Business meeting; July 29, 2011, Board Business meeting; and August 26, 2011, Board Business meeting.

2. PUBLIC COMMENTS/COMMUNICATIONS/MEMBER COMMENTS

Mike Bullock, a member of the public, provided a presentation on Governor’s Executive Order S-3-05, Global Warming Basis & Implications.

Chair Stocks noted that SANDAG won several awards at the Women’s Transportation Seminar (WTS) dinner, including Innovative Transportation Solutions, Programs (Large) - 2050 Regional Transportation Plan Urban Area Transit Strategy; Innovative Transportation Solutions, Technology for Transportation – iCommute, Bike to Work Program; Innovative Transportation Solutions, Innovative Transit Design – State Route 15 Mid-City Bus Rapid Transit Project; and Employer of the Year.

Chair Stocks announced a regionwide promotion of commuter alternates this fall, including billboards, newspaper ads, bus ads, online ads, and radio commercials. SANDAG, with support from the Metropolitan Transit System (MTS), North County Transit District (NCTD), and Caltrans, is promoting all of the commute alternatives on the I-15 Express Lanes. He also noted that Rideshare Week will be held during the first week of October.

Gary Gallegos, Executive Director, announced that Laurie Berman, Caltrans District 11 Director, was selected as the WTS Woman of the Year.

A letter from Kamala D. Harris, State Attorney General, commenting on the Draft Environmental Impact Report for the 2050 Regional Transportation Plan (RTP) and its Sustainable Communities Strategy (SCS), was distributed to the Board.
3. ACTIONS FROM POLICY ADVISORY COMMITTEES (APPROVE)

This item summarized the actions taken by the Borders Committee on July 22, the Transportation Committee on September 2, and the Executive and Public Safety Committees on September 16, 2011.

Action: Upon a motion by Mayor Mary Sessom (Lemon Grove) and second by Mayor Jim Wood (Oceanside), the Board of Directors approved the actions taken by the Policy Advisory Committees at the meetings noted above. Yes – 17 (weighted vote, 100%). No – 0 (weighted vote, 0%). Abstain – 0 (weighted vote, 0%). Absent – Chula Vista, and Coronado.

CONSENT ITEMS (4 through 7)

4. QUARTERLY INVESTMENT REPORT AND ANNUAL INTEREST RATE SWAP EVALUATION FOR PERIOD ENDING JUNE 30, 2011 (INFORMATION)

The SANDAG Investment Policy requires that the Board of Directors be provided a quarterly report of investments held by SANDAG. This report included all money under the direction or care of SANDAG as of June 30, 2011. Board Policy No. 032: San Diego County Regional Transportation Commission Interest Rate Swap Policy also requires an annual report and evaluation of all outstanding interest rate swaps.

5. QUARTERLY PROGRESS REPORT ON TRANSPORTATION PROJECTS - APRIL TO JUNE 2011 (INFORMATION)

This quarterly report summarized the current status of major highway, transit, arterial, traffic management, and transportation demand management projects in the SANDAG five-year Regional Transportation Improvement Program for the period of April to June 2011.

6. REPORT SUMMARIZING DELEGATED ACTIONS TAKEN BY EXECUTIVE DIRECTOR (INFORMATION)

In accordance with SANDAG Board Policy Nos. 003 (Investment Policy), 017 (Delegation of Authority), and 024 (Procurement and Contracting-Construction), this report summarized certain delegated actions taken by the Executive Director since the last Board of Directors meeting.

7. REPORTS ON MEETINGS AND EVENTS ATTENDED ON BEHALF OF SANDAG (INFORMATION)

Board members provided brief reports orally or in writing on external meetings and events attended on behalf of SANDAG since the last Board of Directors meeting.

Action: Upon a motion by Mayor Wood and a second by Mayor Sessom, the Board approved Consent Items Nos. 4 through 7. Yes - 17. No - 0. Abstain - 0. Absent – Chula Vista and Coronado.
CHAIR’S REPORT (8)

8. APPOINTMENT OF NOMINATING COMMITTEE FOR SANDAG BOARD OFFICERS (INFORMATION)

In accordance with the SANDAG Bylaws, the Chair appointed up to a six-person nominating committee for Board officers, made up of Board members from each of the four subregions and a member from the City of San Diego and the County of San Diego. The nominating committee shall not include Board members from jurisdictions that have applicants for the Chair or a Vice Chair position on the Board of Directors. The nominating committee will submit its slate of nominees, in writing, for mailing to Board members in or around November. The members who were appointed included: National City Mayor Ron Morrison (Nominating Committee Chair), San Diego Mayor Jerry Sanders, San Diego County Supervisor Bill Horn, Lemon Grove Mayor Mary Sessom, Poway Mayor Don Higginson, and Carlsbad Mayor Matt Hall.

The following applications for 2012 Board Officer positions were received: Chair – Encinitas Deputy Mayor Jerome Stocks, First Vice Chair – Santee Councilmember Jack Dale, and Second Vice Chair – Imperial Beach Mayor Jim Janney.

REPORTS (9 through 11)

9. 2012 ANNUAL SANDAG BOARD RETREAT (APPROVE)

First Vice Chair Jack Dale introduced this item.

David Hicks, Acting Communications Director, stated that the annual SANDAG Board of Directors Retreat is scheduled to begin on Wednesday, February 1, 2012, and conclude on Friday morning, February 3, 2012. The primary objective of this public meeting is to afford participants the opportunity to discuss strategies for some of the agency’s more important regional policies and programs, and develop ideas for the future direction of the agency. The Board of Directors was asked to approve the topics listed under the Discussion section of this report as the basis for developing the agenda and format for the 2012 SANDAG Board of Directors Retreat.

Board members provided additional suggestions for retreat discussion topics and suggestions for possible speakers at this event.

Action: Upon a motion by Councilmember Mark Arapostathis (La Mesa) and second by Mayor Sessom, the Board of Directors approved the topics contained in the agenda report and suggested at the meeting as the basis for developing the agenda and format for the 2012 SANDAG Board of Directors Retreat. Yes – 17 (weighted vote, 100%). No – 0 (weighted vote, 0%). Abstain – 0 (weighted vote, 0%). Absent – Chula Vista, and Coronado.
10. DRAFT REGIONAL HOUSING NEEDS ASSESSMENT PLAN AND REVIEW OF COMMENTS ON DRAFT RHNA METHODOLOGY AND ALLOCATION (INFORMATION)

Second Vice Chair Jim Janney, Regional Planning Committee Chair, introduced this item.

Susan Baldwin, Senior Planner, reported that at its May 27, 2011, meeting, the Board of Directors accepted the Draft Regional Housing Needs Assessment (RHNA) Methodology and Allocation option for a 60-day public comment period. This report summarized the public comments received, and presented the Draft RHNA Plan, which summarized state law as it pertains to the RHNA; documented how the RHNA determination was made; and described the RHNA Methodology and Allocation, its various components, how it meets the objectives of state law, and is consistent with the SCS included in the Draft 2050 RTP.

Chair Stocks noted there was one request to speak on this item.

Lorraine Leighton, a member of the public, provided comments related to the county housing authority being double-billed for utility costs during 2001-2006.

Mr. Gallegos indicated that staff will schedule meetings with each of the jurisdictions that submitted comment letters on the RHNA Methodology and Allocation, and following those meetings, will provide detailed responses to each of the comment letters received from those jurisdictions.

**Action:** This item was presented for information only.

5. QUARTERLY PROGRESS REPORT ON TRANSPORTATION PROJECTS - APRIL TO JUNE 2011 (INFORMATION) (Continued)

Chair Stocks stated that he had missed a request to speak on this item.

John Wotzka, a member of the public, provided comments on alternative energy solutions to reduce greenhouse gas levels.

11. LOS ANGELES-SAN DIEGO-SAN LUIS OBISPO (LOSSAN) CORRIDORWIDE STRATEGIC IMPLEMENTATION PLAN AND GOVERNANCE INITIATIVES (DISCUSSION/POSSIBLE ACTION)

First Vice Chair Dale, Transportation Committee Chair, introduced this item.

Solana Beach Deputy Mayor Joe Kellejian, the SANDAG representative to the LOSSAN Board of Directors, briefed the Board on the analysis of a potential governance initiative to transfer the authority for intercity passenger rail service from the state to a local entity.

Linda Culp, Principal Planner, reported that in December 2009, the SANDAG Board of Directors approved an interagency memorandum of understanding to work cooperatively with other LOSSAN member agencies to enhance and better integrate the corridor’s passenger rail services. She presented information on the short-term and long-term service plan and improvement goals.
The Board of Directors was asked to provide comments on the LOSSAN business case and support in concept an initiative to explore the possibility of local authority for the LOSSAN corridor’s state-supported intercity service.

Chair Stocks stated there was one request to speak on this item.

Mike Bullock, a member of the public, talked about redesigning rail systems, electrifying rail service, and road pricing.

**Action:** Upon a motion by Mayor Wood and second by Councilmember Carrie Downey (Coronado), the Board of Directors approved supporting in concept an initiative to explore the possibility of local authority for the LOSSAN corridor’s state-supported intercity service. Yes – 17 (weighted vote, 100%). No – 0 (weighted vote, 0%). Abstain – 0 (weighted vote, 0%). Absent – Chula Vista and Lemon Grove.

12. **ADDITIONAL PUBLIC COMMENTS**

Councilmember Downey provided a response to the letter from the state Attorney General’s office on the 2050 RTP, clarifying that SANDAG has complied with current state laws on the matter.

Chair Stocks stated there was another public comment.

Bari Vaz, Mira Mesa Community Vision, invited Board members to an event on Tuesday, September 27, 2011, at 6 p.m., entitled, “The Future of Transportation in Mira Mesa: Trolleys, Buses, and High-Speed Trains.”

13. **UPCOMING MEETINGS**

The next Board Business meetings are scheduled for Friday, October 14, 2011, at 10 a.m. and Friday, October 28, 2011, at 9 a.m.

14. **ADJOURNMENT**

The meeting was adjourned at 10:49 a.m.

DGunn/M/DGU
# ATTENDANCE
## SANDAG BOARD OF DIRECTORS MEETING
### SEPTEMBER 23, 2011

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<thead>
<tr>
<th>JURISDICTION/ORGANIZATION</th>
<th>NAME</th>
<th>ATTENDING</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Carlsbad</td>
<td>Matt Hall (Member)</td>
<td>Yes</td>
</tr>
<tr>
<td>City of Chula Vista</td>
<td>Rudy Ramirez (1st. Alt.)</td>
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</tr>
<tr>
<td>City of Coronado</td>
<td>Carrie Downey (Primary)</td>
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</tr>
<tr>
<td>City of Del Mar</td>
<td>Mark Filanc (2nd Alt.)</td>
<td>Yes</td>
</tr>
<tr>
<td>City of El Cajon</td>
<td>Mark Lewis (Primary)</td>
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<tr>
<td>City of Encinitas</td>
<td>Jerome Stocks, Chair (Primary)</td>
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</tr>
<tr>
<td>City of Escondido</td>
<td>Sam Abed (Primary)</td>
<td>Yes</td>
</tr>
<tr>
<td>City of Imperial Beach</td>
<td>Jim Janney, 2nd Vice Chair (Primary)</td>
<td>Yes</td>
</tr>
<tr>
<td>City of La Mesa</td>
<td>Mark Araporathis (1st. Alt.)</td>
<td>Yes</td>
</tr>
<tr>
<td>City of Lemon Grove</td>
<td>Mary Sessom (Primary)</td>
<td>Yes</td>
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<td>James Wood (Member)</td>
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<tr>
<td>City of Poway</td>
<td>John Mullin (2nd Alt.)</td>
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<tr>
<td>City of San Diego - A</td>
<td>Lorie Zapf (1st Alt.)</td>
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<tr>
<td>City of San Diego - B</td>
<td>Tony Young (Primary)</td>
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<td>City of San Marcos</td>
<td>Jim Desmond (Primary)</td>
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<td>City of Santee</td>
<td>Jack Dale (1st Vice Chair)</td>
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<tr>
<td>City of Solana Beach</td>
<td>Lesa Heebner (Primary)</td>
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<td>City of Vista</td>
<td>Judy Ritter (Primary)</td>
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<td>Bill Horn (Primary, Seat A)</td>
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<td>County of San Diego - B</td>
<td>Ron Roberts (Primary, Seat B)</td>
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<td>Caltrans</td>
<td>Laurie Berman (1st. Alt.)</td>
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<td>MTS</td>
<td>Harry Mathis (Primary)</td>
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<tr>
<td>NCTD</td>
<td>Chris Orlando (Primary)</td>
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<td>Imperial County</td>
<td>Sup. John Renison (Primary)</td>
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<tr>
<td>US Dept. of Defense</td>
<td>CAPT James M. Wink (Alternate)</td>
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<td>SD Unified Port District</td>
<td>Scott Peters (Member)</td>
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<td>SD County Water Authority</td>
<td>Mark Muir (Primary)</td>
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<td>Baja California/Mexico</td>
<td>Alberto Diaz (Alternate)</td>
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<td>Southern California Tribal Chairmen’s Association</td>
<td>Allen Lawson (Member)</td>
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<tr>
<td></td>
<td>Edwin Romero (Member)</td>
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</table>
actions from policy advisory committees

the following actions were taken by the policy advisory committees since the last board of directors meeting.

borders committee meeting (september 23, 2011)

the borders committee took the following actions or recommended the following approvals:

• appointed escondido councilmember ed gallo (north county inland), oceanside councilmember gary felien (north county coastal), and county supervisor pam slater-price (county of san diego), to participate at the next interstate 15 interregional partnership meeting to be held in late fall 2011.

• recommended that the sandag board of directors approve the recommendations and next steps resulting from the 2011 binational seminar entitled “enhancing transit and non-motorized mobility on the border.”

transportation committee meeting (october 7, 2011)

the transportation committee took the following actions or recommended the following approvals:

• approved the allocation of $185,000 in transnet active transportation funds for the coastal rail trail, phase 2b – oceanside (cip 1223024) project; reprogrammed $185,000 of federal transportation enhancement funds to the coastal rail trail – encinitas chesterfield to g street ($93,000) and sweetwater bikeway – plaza bonita segment ($92,000) projects; and approved amendments to the capital improvement program (cip) for these three projects.

• recommended that the board of directors: (1) approve funding the interstate 5/genesee avenue interchange and widening project with up to $56.3 million in transnet funds, to fully fund this $94.1 million nearly ready-to-go project in partnership with the city of san diego and caltrans; (2) authorize the executive director to enter into any agreements reasonably necessary to carry out the project, including but not limited to cooperative or other agreements with other project participants; and (3) amend the fy 2012 budget to add this cip project.

• approved the use of up to $21,000 in regional surface transportation program apportionment funds to pay for the san diego regional share of the california local streets and roads needs assessment.
• Approved a $500,000 budget increase to the FY 2012 Budget and Overall Work Program (OWP) for the Interstate 15 (I-15) FasTrak® Value Pricing Program (OWP 33103) for a total FY 2012 contribution of $1 million to the Metropolitan Transit System for I-15 transit services.

• Recommended that the Board of Directors approve the Regional Multimodal Transportation Analysis Study.

REGIONAL PLANNING COMMITTEE MEETING (October 7, 2011)

The Regional Planning Committee took the following actions or recommended the following approvals:

• Recommended that the Board of Directors: (1) approve minor updates to the five-year Environmental Mitigation Program (EMP) funding strategy, including the allocation of FY 2012 funding for management and monitoring activities pursuant to the executed TransNet EMP Memorandum of Agreement; and (2) approve the award of FY 2011 EMP funding for 15 land management grants described in the report.

EXECUTIVE COMMITTEE MEETING (October 14, 2011)

The Executive Committee took the following actions or recommended the following approvals:

• Approved FY 2012 Budget amendments to accept three Caltrans transportation planning grants totaling $560,000, and use of the required matching funds totaling $78,868 (OWP 31019, 33035, 33120, and 31007).

• Recommended that the Board of Directors approve proposed amendments to Board Policies, and renew the annual delegation of authority to the Executive Director, pursuant to Board Policy No. 003, Investment Policy.

• Approved the agenda for the October 28, 2011, Board of Directors meeting, as amended.

TRANSPORTATION COMMITTEE MEETING (October 21, 2011)

The Transportation Committee is scheduled to take the following actions or recommend the following approvals:

• Approve Amendment No. 12 to the 2010 Regional Transportation Improvement Program (RTIP).

• Recommend that the Board of Directors approve Resolution No. 2012-07, approving Amendment No. 13 to the 2010 RTIP, including findings that the amendment is in conformance with the State Implementation Plans for air quality and is consistent with the 2050 Regional Transportation Plan.

• Recommend that the Board of Directors approve the programming and submission of the 2012 State Transportation Improvement Program to the California Transportation Commission.
• Recommend that the Board of Directors approve the proposed changes to Board Policy No. 018; and adopt the proposed Title VI Analysis Methodology for Service Changes and the Title VI Analysis Methodology for Fare Changes.

• Approve amendments to the FY 2011 and FY 2012 Budgets to carryover $294,998 from FY 2011 to FY 2012 for Los Angeles-San Diego-San Luis Obispo Rail Corridor Agency (LOSSAN) Rail Corridor Planning (OWP 34006).

PUBLIC SAFETY COMMITTEE MEETING (October 21, 2011)

The Public Safety Committee is scheduled to take the following actions or recommend the following approvals:

• Recommend that the Board of Directors approve an amendment to the FY 2012 Budget to increase funding by $1,086,000 from $1,367,368 to $2,453,368 for the Automated Regional Justice Information System (ARJIS) Interregional Justice Data Sharing project (OWP 3400800).

• Approve acceptance of a $275,000 grant from the Bureau of Justice Assistance to develop the multi-jurisdictional Southwest Offender Real-Time Notification application; and authorize the Executive Director to execute the associated grant agreement.

• Approve an amendment to the FY 2012 Budget to accept $121,955 in funding for new OWP work element 23459, for the Senate Bill 678 Revocation Reduction Evaluation.

• Approve an amendment to the FY 2012 Budget for OWP work element 23512, Community Assessment Team Plus, to close out the expired grant from the Office of Adolescent Health to conduct a rigorous study of an evidence-based prevention curriculum, and accept the new grant, which extends into FY 2013, to continue the study.

• Recommend that the Executive Committee include the proposed public safety-related goals in the 2012 SANDAG Legislative Program.

Staff will update the Board of Directors if the actual actions taken by the Transportation and Public Safety Committees on October 21, 2011, differ from those described in this report.

GARY L. GALLEGOS
Executive Director
### 2012 Calendar of Meetings of the SANDAG Board of Directors and Policy Advisory Committees

<table>
<thead>
<tr>
<th>Board of Directors – Policy or Business</th>
<th>Board of Directors – Business</th>
<th>Transportation Committee</th>
<th>Regional Planning Committee</th>
<th>Executive Committee</th>
<th>Public Safety Committee</th>
<th>Borders Committee</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Normally second Friday, 10 a.m. to 12 noon)</td>
<td>(Normally fourth Friday, 9 a.m. to 12 noon)</td>
<td>(Normally first and third Fridays, 9 a.m. to 12 noon)</td>
<td>(Normally first Friday, 12 noon to 2 p.m.)</td>
<td>(Normally second Friday, 9 to 10 a.m.)</td>
<td>(Normally third Friday, 1 to 3 p.m.)</td>
<td>(Normally fourth Friday, 12:30 to 2:30 p.m.)</td>
</tr>
<tr>
<td>*November 2, 2012 (First Friday due to Thanksgiving holiday)</td>
<td>*November 16, 2012 (Third Friday due to Thanksgiving holiday)</td>
<td>*November 9, 2012 (Second Friday due to Thanksgiving holiday)</td>
<td>November 2, 2012 *November 2, 2012 (First Friday due to Thanksgiving holiday)</td>
<td>*November 9, 2012 (Second Friday due to Thanksgiving holiday)</td>
<td>*November 16, 2012 (Third Friday due to Thanksgiving holiday)</td>
<td></td>
</tr>
<tr>
<td>*December 7, 2012 (First Friday due to Christmas holiday)</td>
<td>*December 21, 2012 (Third Friday due to Christmas holiday)</td>
<td>*December 14, 2012 (Second Friday due to Christmas holiday)</td>
<td>December 7, 2012 *December 7, 2012 (First Friday due to Christmas holiday)</td>
<td>*December 14, 2012 (Second Friday due to Christmas holiday)</td>
<td>To be scheduled only if needed</td>
<td></td>
</tr>
</tbody>
</table>

*Changes to normal meeting schedule shown in **bold**.
PROPOSED FY 2012 BUDGET AMENDMENT:
AUTOMATED REGIONAL JUSTICE INFORMATION
SYSTEM INTERREGIONAL JUSTICE DATA-SHARING

Introduction

The Interregional Justice Data-Sharing work element (3400800) utilizes grant funding to develop and implement interagency information sharing projects. Over the past several years, funding for these projects has been awarded to Automated Regional Justice Information System (ARJIS) from the U.S. Department of Homeland Security Urban Area Security Initiative (UASI). Recently, UASI has approved a grant extension to continue funded activities for several projects initiated in FY 2011 into FY 2012 and offered ARJIS additional funding to implement new technologies and to expand on existing applications. This grant extension and new award would enable ARJIS to improve the operational efficiency and effectiveness of law enforcement agencies in the region resulting in enhanced officer and public safety.

Discussion

The Interregional Justice Data-Sharing program has resulted in the development of new technologies that enable law enforcement officers throughout the region to share data for the purposes of solving and preventing crimes. Through this grant-funded initiative, ARJIS has successfully consolidated License Plate Reader (LPR) data from the nine participating police agencies and developed an application that provides users access to this data through a single search inquiry. In addition, this initiative has facilitated the completion of an interface between ARJIS and the Sheriff’s Records Management System known as NetRMS. This interface provides for the timely incorporation of Sheriff’s records into ARJIS, eliminating duplicate data entry and improving accuracy. The public has benefited from this program as well through the deployment of the regional eWatch system, which provides daily e-mail notifications of crimes in the community.

By accepting the new grant funding and extending existing grants, ARJIS would continue to provide the law enforcement community and the public with tools for enhancing public safety. Several initiatives underway would be completed and new technologies would be launched. Modules for the investigative tool known as COPLINK would be procured and implemented that would provide ARJIS users with facial recognition capabilities for identification purposes. Positive identification

Recommendation

The Public Safety Committee recommends that the Board of Directors approve an amendment to the FY 2012 Budget to increase funding by $1,086,000 from $1,367,368 to $2,453,368 for the ARJIS Interregional Justice Data-Sharing work element (3400800) (Attachment 1).
would be further enhanced through a mobile project for the region’s Terrorism Liaison Officers, providing personal digital assistants (PDAs) for access to critically needed data in the field. The interface with NetRMS as well the LPR project would continue to expand to meet new requirements and user needs.

GARY L. GALLEGOS
Executive Director

Attachment: 1. Work Element 3400800, ARJIS: Interregional Justice Data-Sharing

Key Staff Contacts:  Pam Scanlon, (619) 533-4204, pscanlon@arjis.org
Tim Watson, (619) 699-1966, twa@sandag.org
WORK ELEMENT: 34008.00  ARJIS: Interregional Justice Data-Sharing
FY 2012 BUDGET: $922,381 $1,218,050
AREA OF EMPHASIS: Internal & External Coordination

### Funds Source

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<tr>
<th>Funds Source</th>
<th>Prior FY 2012</th>
<th>FY 2013</th>
<th>Total</th>
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<tbody>
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<td>Dept. of Homeland Security (DHS)</td>
<td>$444,987</td>
<td>$922,381</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td>$950,561</td>
<td>$1,218,050</td>
<td>$284,757</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>$444,987</td>
<td>$922,381</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td>$950,561</td>
<td>$1,218,050</td>
<td>$284,757</td>
</tr>
</tbody>
</table>

Note: UASI Grants and grant extensions (from DHS) from 2008 - $625,911 (as revised); 2009 - $591,457 (as revised); 2010 - $1,236,000 for a current total of $2,453,368.

### Funds Application

<table>
<thead>
<tr>
<th>Funds Application</th>
<th>Prior</th>
<th>FY 2012</th>
<th>FY 2013</th>
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<tbody>
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<td>$227,198</td>
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<td>Other Direct Costs</td>
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<td></td>
<td>$35</td>
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<td>Contracted Services</td>
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<td>$723,328</td>
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<td>$1,367,368</td>
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<td>$950,561</td>
<td>$1,218,050</td>
<td>$284,757</td>
<td>$2,453,368</td>
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</table>

**OBJECTIVE**

The objective of this work element is to coordinate, develop, and implement applications that enhance public safety throughout the San Diego region. The emphasis in FY 2012 will be to: (1) upgrade the regional license plate reader (LPR) server; (2) oversee the installations of LPRs at agencies in the region and the development of the interfaces to these readers; (3) implement new COPLINK modules; (4) develop interfaces from computer aided dispatch (CAD) 911 systems to ARJIS databases; procure and deploy personal digital assistants (PDA’s) for terrorism liaison officers in the region; and (5) complete the Sheriff Records Management System interface to ARJIS (NetRMS).
**PREVIOUS ACCOMPLISHMENTS**

ARJIS has implemented and rolled out the COPLINK application, which enables the real-time sharing of information between the counties of San Diego, Imperial, and Orange, and Tucson, AZ. ARJIS has successfully implemented a regional LPR server that enables the LPRs from Imperial and San Diego Counties to share data with ARJIS member agencies.

**Project Manager:** Mugg, Katie  
**Committee(s):** Borders Committee, Public Safety Committee  
**Working Group(s):** ARJIS Business Working Group, ARJIS Technical Working Group

**PRODUCTS, TASKS, AND SCHEDULES**

<table>
<thead>
<tr>
<th>Task No.</th>
<th>% of Effort</th>
<th>Task Description / Product / Schedule</th>
</tr>
</thead>
</table>
| 1        | 20          | Task Description: Oversee the implementation of LPRs in the region and the development of the interfaces from these readers to the ARJIS regional server.  
**Product:** Technical specifications for the LPR to ARJIS interfaces  
**Completion Date:** 5/31/2012 |
| 2        | 25          | Task Description: Implement new COPLINK modules. Included are user test and acceptance plans, training, and outreach materials.  
**Product:** New capabilities, outreach, and training materials  
**Completion Date:** 6/30/2012 |
| 3        | 20          | Task Description: Develop a real-time interface from a CAD 911 system to ARJIS databases.  
**Product:** CAD to ARJIS interface  
**Completion Date:** 4/30/2012 |
| 4        | 15          | Task Description: Complete the Sheriffs NetRMS interface to ARJIS.  
**Product:** Sheriff RMS to ARJIS interface  
**Completion Date:** 3/31/2012 |
| 5        | 20          | Task Description: Upgrade the regional LPR server.  
**Product:** Technical specifications for server upgrade  
**Completion Date:** 3/31/2012 |
| 6        | 20          | Task Description: Procure and deploy PDA’s for the terrorism liaison officers in the San Diego region.  
**Product:** New capabilities for officers in the field  
**Completion Date:** 6/30/2012 |

**FUTURE ACTIVITIES**

ARJIS will continue collaborating with multiple jurisdictions in the region to enhance information-sharing.
REPORT SUMMARIZING DELEGATED ACTIONS
TAKEN BY EXECUTIVE DIRECTOR

File Number 8000100

Introduction

Board Policy Nos. 003, 017, and 024 require the Executive Director to report certain actions to the Board of Directors on a monthly basis.

Discussion

Board Policy No. 003

Board Policy No. 003, “Investment Policy,” states a monthly report of all investment transactions shall be submitted to the Board. Attachment 1 contains the reportable investment transactions for August 2011.

Board Policy No. 017

Board Policy No. 017, “Delegation of Authority,” requires the Executive Director to report to the Board certain actions taken at the next regular meeting.

Section 4.1 of the policy authorizes the Executive Director to enter into agreements not currently incorporated in the budget and make other modifications to the budget in an amount up to $100,000 per transaction, so long as the overall budget remains in balance. Additionally, Section 4.12 of the policy authorizes the Executive Director to transfer funds in the SANDAG budget for capital improvement projects following approval of such a transfer by the affected transit operator’s board of directors. Attachment 2 contains the reportable actions since the report made at the last meeting.

Board Policy No. 024

Board Policy No. 024, “Procurement and Contracting-Construction,” requires the Executive Director to report to the Board the granting of (1) Relief from Maintenance and Responsibility over $25,000, and (2) Acceptance of Work for construction contracts over $25,000. There are no delegated action items to report since the report made at the last meeting.

GARY L. GALLEGOS
Executive Director

Attachments: 1. Reportable Investment Transactions for August 2011
2. Budget Transfers and Amendments

Key Staff Contact: Lauren Warrem, (619) 699-6931, lwa@sandag.org
## MONTHLY ACTIVITY FOR INVESTMENT SECURITIES TRANSACTIONS FOR AUGUST 1 THROUGH AUGUST 31, 2011

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<td>6/30/2012</td>
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<td>$1,450,000.00</td>
<td>$1,452,962.28</td>
<td>0.40% ***</td>
</tr>
<tr>
<td>8/2/2011</td>
<td>6/30/2012</td>
<td>US TREASURY NOTES</td>
<td>$5,050,000.00</td>
<td>$5,069,332.03</td>
<td>0.33% ***</td>
</tr>
<tr>
<td>8/3/2011</td>
<td>2/3/2014</td>
<td>FEDERAL HOME LN MTG CORP</td>
<td>$3,000,000.00</td>
<td>$2,994,300.00</td>
<td>1.44% ***</td>
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<tr>
<td>8/12/2011</td>
<td>11/26/2014</td>
<td>FEDERAL FARM CR BKS CONS</td>
<td>$3,000,000.00</td>
<td>$3,001,200.00</td>
<td>1.16% ***</td>
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<tr>
<td>8/18/2011</td>
<td>11/18/2013</td>
<td>FEDERAL HOME LN MTG CORP</td>
<td>$3,000,000.00</td>
<td>$3,005,970.00</td>
<td>1.20% ***</td>
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<tr>
<td>8/19/2011</td>
<td>11/19/2013</td>
<td>FEDERAL HOME LN MTG CORP</td>
<td>$3,000,000.00</td>
<td>$3,001,875.00</td>
<td>0.95% ***</td>
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<tr>
<td>8/24/2011</td>
<td>5/24/2013</td>
<td>FEDERAL HOME LN MTG CORP</td>
<td>$3,000,000.00</td>
<td>$3,000,000.00</td>
<td>1.00% ***</td>
</tr>
<tr>
<td>8/24/2011</td>
<td>2/24/2015</td>
<td>FEDERAL NATL MTG ASSN NOTES</td>
<td>$1,920,000.00</td>
<td>$1,917,600.00</td>
<td>1.00% ***</td>
</tr>
<tr>
<td>8/31/2011</td>
<td>6/8/2012</td>
<td>US TREASURY NOTES</td>
<td>$10,000,000.00</td>
<td>$10,058,500.00</td>
<td>1.08% **</td>
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<tr>
<td><strong>TOTAL SOLD:</strong></td>
<td>$33,420,000.00</td>
<td>$33,501,739.31</td>
<td>0.96%</td>
<td></td>
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</table>

*These security sales were in a continued effort to take advantage of the wider yield spread (yield difference) between U.S. Treasuries and Federal Agency securities by selling Treasuries and purchasing Agencies. These trades were done on a duration neutral basis by keeping a similar portfolio length.

**Proceeds of this security sale were used to purchase a Freddie Mac Global Note with a longer duration to maturity.

***This security was called by the issuer.
BUDGET TRANSFERS AND AMENDMENTS
in ’000s

<table>
<thead>
<tr>
<th>PROJECT NUMBER</th>
<th>PROJECT NAME</th>
<th>CURRENT BUDGET</th>
<th>NEW BUDGET</th>
<th>CHANGE</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1142100</td>
<td>Substation Standardization</td>
<td>$6,179.0</td>
<td>$6,414.0</td>
<td>$235.0</td>
<td>Transfer $235K from the Grantville Feeder Cable Replacement project (1130200) to the Substation Standardization project (1142100). In January 2011 the MTS Board of Directors approved a new capital project for Grantville Feeder Replacement, funded by transferring $300K from the Substation Standardization project, to replace burnt feeder cable feeding current from the Grantville Substation to the overhead catenary system. Ultimately, it was determined that the damage to the cables was confined to a small section of the feeder cable near the catenary connection and could be replaced for $65K. The $235K balance is being returned to the Substation Standardization project. This action was approved by the MTS Board of Directors at its August 18, 2011, meeting under Agenda Item No. 13.</td>
</tr>
<tr>
<td>1130200</td>
<td>Grantville Feeder Cable Replacement</td>
<td>$300.0</td>
<td>$65.0</td>
<td>($235.0)</td>
<td></td>
</tr>
<tr>
<td>2300600</td>
<td>GIS to Support Modeling, Forecasting, and Planning Efforts - FY 2011</td>
<td>$544.7</td>
<td>$523.0</td>
<td>($21.7)</td>
<td>Carryover remaining contract services relating to GIS Enhancements for Regional Models from FY 2011 into FY 2012.</td>
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<tr>
<td>2300600</td>
<td>GIS to Support Modeling, Forecasting, and Planning Efforts - FY 2012</td>
<td>$733.3</td>
<td>$755.0</td>
<td>$21.7</td>
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<tr>
<td>2301100</td>
<td>Transportation Studies - FY 2011</td>
<td>$649.4</td>
<td>$607.7</td>
<td>($41.7)</td>
<td>Carryover $41.7K remaining visitor survey incomplete obligations from FY 2011 into FY 2012.</td>
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<tr>
<td>2301100</td>
<td>Transportation Studies - FY 2012</td>
<td>$461.4</td>
<td>$503.1</td>
<td>$41.7</td>
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<tr>
<td>2301100</td>
<td>Transportation Studies - FY 2012</td>
<td>$503.1</td>
<td>$499.5</td>
<td>($3.6)</td>
<td>Transferred $3.6K from project #2301100 and $19.0K from project #7300000 in staffing resources to assist with project #3320700 (a portion of the amount reported in the September 2011 delegated actions agenda report).</td>
</tr>
<tr>
<td>7300000</td>
<td>TransNet Public Information Program</td>
<td>$309.7</td>
<td>$290.7</td>
<td>($19.0)</td>
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<tr>
<td>3320700</td>
<td>A Rail Line Runs Through It - Transit Services in San Marcos - FY 2012</td>
<td>$0.0</td>
<td>$22.6</td>
<td>$22.6</td>
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REPORTS ON MEETINGS AND EVENTS ATTENDED ON BEHALF OF SANDAG

Since the last Board of Directors meeting, Board members participated in the following meetings and events on behalf of SANDAG. Key topics of discussion also are summarized.

Washington, D.C.

- Chair Jerome Stocks and Second Vice Chair Jim Janney joined the San Diego Regional Chamber of Commerce on this annual advocacy trip. They attended various meetings with Congressional members and Administration representatives regarding regional priorities, including a meeting with key Federal Transit Administration (FTA) staff regarding New Starts funding for the Mid-Coast Corridor trolley extension.

September 22, 2011: California Air Resources Board Meeting
Sacramento, CA

- Chair Stocks and First Vice Chair Jack Dale provided testimony before the California Air Resources Board regarding the 2050 Regional Transportation Plan and its Sustainable Communities Strategy.

September 28, 2011: Full Access and Coordinated Transportation (FACT) Board of Directors meeting
Encinitas, CA

- Solana Beach Councilmember David Roberts participated as the SANDAG representative to the FACT Board. FACT won the Women’s Transportation Seminar Innovation Transportation Solutions Award for Small Programs. FACT has submitted a Veteran’s Mobility grant on its own without a transit partner. FACT Executive Director Arun Prem was elected to the American Public Transportation Administration Board of Directors. FACT has seen a large increase in phone/e-mail hits in the last 60 days for services; one reason is great collaboration with 211. The FACT Board approved a vehicle disposition process to sell surplus North County Transit District vehicles. An AltaGolden Service proposal for Rancho Bernardo, Poway, and Escondido was discussed, and the Board asked the Software & Services Development Subcommittee to research the project in more detail. The FACT Board also received an update on website development efforts to drive more traffic to the organization’s website. In addition, the FACT Board nominating committee recommended Dave Roberts for Chair, Bob Campbell for Vice Chair, Susan Hafner for Treasurer, and Teresa Barth for Secretary for next year’s (2012) slate of officers.
September 28, 2011: Los Angeles-San Diego-San Luis Obispo (LOSSAN) Corridor Board of Directors meeting
Los Angeles, CA

- Solana Beach Deputy Mayor Joe Kellejian participated as the SANDAG representative to the LOSSAN Board of Directors. There were continued Board discussions on the corridorwide business case for new passenger rail services and the potential governance initiative.

October 2-5, 2011: American Public Transportation Association (APTA) Annual Meeting & EXPO
New Orleans, LA

- Chair Stocks and First Vice Chair Dale attended this APTA event, which provides elected officials and public transit professionals the opportunity to attend a variety of informational sessions and learn more about technology, products, and services available to the public transportation industry. Conference sessions included updates from FTA Administrator Peter Rogoff and his senior agency staff, a view from Capitol Hill on the federal transit program and high-speed rail, and models of public-private partnerships, among others.

GARY L. GALLEGOS
Executive Director
FINANCIAL MARKET STATUS AND TransNet
SUBSTITUTION OF LIQUIDITY PROVIDER

Introduction

This quarterly report is intended to keep the Board of Directors informed about the latest developments in the financial markets, the economy, and revenues, and the strategies being explored and implemented to minimize possible impacts to SANDAG. This report also provides information to the Board with respect to the recent replacement of Dexia as the underlying liquidity facility provider for half of the long-term variable rate debt and for the commercial paper program. This did not involve any new borrowing.

Discussion

In March 2008, SANDAG issued $600 million of long-term variable rate debt for the purposes of implementing the TransNet Early Action Program (EAP) of projects. In addition, SANDAG has a subordinate commercial paper program available for use up to $100 million of which $34 million is outstanding. The variable rate debt program continues to be cost-effective, resulting in savings of more than $17 million in comparison to issuing fixed rate bonds in 2008. The remaining portion of the debt program is strategically diversified with $350 million in fixed rate bonds issued in 2010 at a 3.89 percent interest rate, net of the Build America Bonds subsidy for a 38-year maturity. Attachment 1 depicts the interest rates for both the 2008 variable rate and 2010 fixed rate bonds.

Variable Rate Bonds and Commercial Paper Debt Programs and Substitution of Liquidity Provider

To provide the underlying liquidity facilities for the long-term variable rate debt and commercial paper program, SANDAG originally entered into agreements with two banks, JP Morgan Chase Bank (JP Morgan) and Dexia Credit Local Bank (Dexia). Variable rate bonds and commercial paper are remarketed (traded) on a short-term basis and require liquidity from a third-party bank, or liquidity provider, which basically serves as a line of credit to make funds available if the remarketing agents/dealers are unable to find new buyers for the securities. The interest rate on the variable rate bonds resets every week as traded by remarketing agents, based upon the current market rates and the liquidity provider’s credit rating.

JP Morgan provides the liquidity for one-half of the variable rate debt program (2008 Series A and B), or approximately $283 million. Replaced in September 2011, Dexia formerly provided the liquidity for the remaining half in the same amount (2008 Series C and D) and for the commercial paper program. The JP Morgan liquidity facility was initially entered into for a one-year period and has been successfully renewed several times, with the current expiration in March 2012. The JP Morgan portion of the variable rate debt program continues to show stable trading performance.
Because of credit-related events beyond the control of SANDAG with respect to Dexia, the Dexia portion of the variable rate bonds and the commercial paper program were not trading as favorably during the last few months. Staff continually monitors current events that could potentially impact the trading performance of the SANDAG debt portfolio, and as a result, began taking steps in June to replace the Dexia liquidity facility. The Dexia credit events were centered primarily around the downgrading of Dexia's credit rating (resulting from concerns regarding Dexia’s ability to become independent from government support in the foreseeable future), and the decision of the larger money market funds to remove Dexia from their “approved list” for purchase. More recently, a rescue plan was approved by the Belgian, French, and Luxembourg governments earlier this month to break up the bank, including Belgian nationalization and French and Luxembourg sell off of units.

At its July 2011 meetings, the Independent Taxpayer Oversight Committee and the Board of Directors received a verbal update on the SANDAG debt portfolio and were informed of the intent to replace Dexia. SANDAG issued a Request for Qualifications (RFQ) for Replacement Liquidity Providers for Series C and D of the 2008 variable rate bonds and for the commercial paper program.

SANDAG received seven bids for the 2008 Series C and D bond liquidity facilities totaling $1.12 billion (four times the amount required) and three bids for the commercial paper liquidity facility totaling $300 million (three times the amount required). The number of responses to our RFQ is attributable to the agency’s excellent credit rating. The responses were evaluated with respect to pricing and terms. In addition, we reviewed the credit ratings of the liquidity providers to ensure that they were accepted by the funds and investors that typically purchase our variable rate bonds, and that the bonds backed by these liquidity providers trade well in the market. As a result, the following providers were selected:

- Series C Bonds – Mizuho Corporate Bank, Ltd. for a period of three years at 40 basis points
- Series D Bonds – State Street Bank and Trust Company/California State Teachers Retirement System for a period of four years at 55 basis points
- Commercial Paper – Bank of America, N.A. for a period of one year at 47 basis points

For comparison purposes, the current rate with JP Morgan on the Series A and B liquidity facility is 59 basis points, for a one-year term (negotiated in March 2011).

As part of entering into new liquidity arrangements, the SANDAG financing team presented to both credit rating agencies, Standard & Poor’s (S&P) and Moody’s, on August 24, 2011, and received confirmation of existing SANDAG ratings (AAA by S&P and AA1 by Moody’s). The Board also reviewed a report on the two disclosure documents, the Remarketing Memorandum (Series C Bonds and Series D Bonds) and the Offering Memorandum (commercial paper), at its September 16, 2011, meeting.

The agreements with the three banks at the terms listed above were finalized on September 28, 2011. The 2008 Series C and D Bonds are once again trading comparatively with the 2008 Series A and B Bonds. The commercial paper program also is trading much more favorably in relation to interest rates and a longer duration to maturity. The new liquidity providers should result in immediate savings of approximately $225,000 per month compared to the last trading levels experienced with the prior Dexia facilities.
Sales Tax Revenues

SANDAG has received revenues for TransNet and Transportation Development Act (TDA) for the first quarter of FY 2012. Revenues received during the first quarter of FY 2012 are 6.5 percent higher for TransNet and 5.7 percent higher for TDA as compared to the same quarter last year. FY 2012 revenues were budgeted to be 4 percent higher than the revised FY 2011 sales tax revenue estimates. Revenues are expected to total $225.1 million for TransNet and $109.5 million for TDA in FY 2012. Therefore, sales tax receipts through the first quarter of FY 2012 are slightly higher than originally expected.

The improvement in sales tax receipts during FY 2011 is likely attributable to a more stable national and local economy. The recession officially ended in July 2009 and job growth nationally turned positive at the start of calendar year 2010 and the unemployment rate has edged downward. Although the growth in sales tax receipts has been greater than expected for the past five quarters, the national and local economies are experiencing some difficulty maintaining the growth trend during calendar year 2011; job growth has slowed and the unemployment rate has remained at the same level over the past three months. Staff will continue to monitor sales tax revenues and report to the Board on a quarterly basis.

GARY L. GALLEGOS
Executive Director

Attachment: 1. SANDAG Long-Term Debt Portfolio

Key Staff Contacts: Lauren Warrem, (619) 699-6931, lwa@sandag.org
Marney Cox, (619) 699-1930, mco@sandag.org
Kim Kawada, (619) 699-6994, kka@sandag.org
SANDAG Long-Term Debt Portfolio

- 2008 Variable Rate Bonds ($600 million; 30 year maturity)
- 2010 Fixed Rate Bonds ($350 million; 38 year maturity)

Graph showing the interest rates for the aforementioned debt portfolio from 3/31/08 to 12/31/11 with 3.89% highlighted.
FINAL 2050 SAN DIEGO REGIONAL TRANSPORTATION PLAN, INCLUDING ITS SUSTAINABLE COMMUNITIES STRATEGY

File Number 3100500

Introduction

The 2050 Regional Transportation Plan (2050 RTP or the Plan) is the blueprint for a regional transportation system that further enhances our quality of life, promotes sustainability, and offers more mobility options for people and goods. Looking 40 years ahead, another 1.25 million residents will live in our region. The region will create half a million new jobs and build nearly 400,000 new homes. The Plan envisions most of these new jobs and homes situated in environmentally sustainable communities that are more conducive to walking and bicycling. They also will have more access to public transit.

The 2050 RTP contains a robust transportation network, with a diversity of projects that will provide residents and visitors with a variety of travel choices. The regional transportation network, in conjunction with how local jurisdictions develop land, will provide additional opportunities for walking, biking, getting to work, going to school, shopping, and playing.

The 2050 RTP and its Sustainable Communities Strategy (SCS) seek to guide the San Diego region toward a more sustainable future by integrating land use, housing, and transportation planning to create communities that are more sustainable, walkable, transit-oriented, and compact. Planning for future patterns of density, how people get around, and how land is used is

Recommendation

The Board of Directors is asked to:

1. Approve Resolution No. 2012-08 certifying that the Final Environmental Impact Report (EIR) for the 2050 San Diego Regional Transportation Plan (2050 RTP) has been completed in compliance with the California Environmental Quality Act (Public Resource Code §21000 et seq., “CEQA”), that the Final EIR was presented to and reviewed and considered by the Board of Directors prior to approving the Project, and that the Final EIR represents the independent judgment and analysis of SANDAG, and adopting the Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program;

2. Find the 2050 RTP Revenue Constrained Plan in conformance with the State Implementation Plans for air quality;

3. Find that the 2050 RTP and its Sustainable Communities Strategy (SCS) meet the greenhouse gas reduction targets established by the California Air Resources Board;

4. Approve Resolution No. 2012-09 adopting the air quality conformity determination, finding that the SCS achieves the greenhouse gas reduction targets established by the CARB, and meets the requirements established by Senate Bill 375 (Steinberg, 2008) as codified in Government Code §65080(b) et seq., and adopting the 2050 RTP, including its SCS, and the Final 2050 Regional Growth Forecast.
really driven by one goal: creating great places to live, work, and play. The path toward living more sustainably is: focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, protect sensitive habitat and open space, invest in a transportation network that provides residents and workers with transportation options that reduce greenhouse gas emissions, and implement the Plan through incentives and collaboration.

SANDAG implemented a comprehensive public outreach and involvement program to support the development of the 2050 RTP and its SCS. The 2050 RTP Public Involvement Plan outlined specific activities for communicating with the public throughout the development of the RTP and its SCS. To engage low-income and minority communities early in the planning process, SANDAG established a mini-grant program to focus on their concerns in a timely and meaningful way, and to provide resources so community collaboratives could reach out to their constituents throughout the process. The goals, strategies, and tactics outlined in the Public Involvement Plan have built awareness of the regional transportation planning process, and identified opportunities for stakeholders to shape our region’s future.

Discussion

Final Environmental Impact Report (EIR)

Attachment 1 is the resolution certifying the Final EIR prepared for the 2050 RTP and adopting the Findings (Attachment 1A), Statement of Overriding Considerations (Attachment 1B), and Mitigation Monitoring and Reporting Program (Attachment 1C).

The Final EIR consists of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A-F); and (3) comments and recommendations received on the Draft EIR, a list of persons, organizations, and public agencies commenting on the Draft EIR, SANDAG responses to significant environmental points raised in the review and consultation process, and Master Responses to comments and other information (bound separately as “Appendix G”). SANDAG received comments from four state agencies, six member agencies, two tribal governments, eight organizations, and one individual. The Final EIR incorporates changes made to the Draft EIR as a result of comments received during the public review period and minor changes made to the Draft 2050 RTP. Due to binding constraints, comments and responses to comments on the Draft EIR were bound separately in “Appendix G.” Changes made to the Draft EIR did not result in any new significant impacts not addressed in the Draft EIR, or increase the severity of significant impacts identified in the Draft EIR. The responses demonstrate that the EIR fully complies with all applicable California Environmental Quality Act (CEQA) requirements.

Pursuant to Public Resources Code §21081 and CEQA Guidelines §15091, SANDAG has prepared findings for every significant impact identified in the EIR and for each alternative evaluated in the EIR, as well as alternatives and mitigation measures proposed in comments on the Draft EIR that were not adopted. The findings are set forth in Attachment 1A to the Resolution certifying the Final EIR (Attachment 1 to this Board Report).

Even after adoption of all feasible mitigation measures, the 2050 RTP/SCS will have significant impacts that cannot be fully mitigated to less than significant. SANDAG has prepared a Statement of Overriding Considerations in compliance with Public Resources Code §21081 and CEQA Guidelines §15093, which concludes that specific economic, legal, social, technological, and other benefits of the 2050 RTP/SCS outweigh the significant and unavoidable impacts identified in the EIR.
The Statement of Overriding Considerations is set forth in Attachment 1B to the Resolution certifying the Final EIR (Attachment 1 to this Board Report).

Additionally, SANDAG has prepared a Mitigation Monitoring and Reporting Program in compliance with Public Resources Code §21081.6 and CEQA Guidelines §15097 to ensure compliance with the mitigation measures identified in the EIR during project implementation and operation. The Mitigation Monitoring and Reporting Program is set forth in Attachment 1C to the Resolution certifying the Final EIR (Attachment 1 to this Board Report).

**Air Quality Conformity Determination**

Attachment 2 describes the process used to document the conformity of the 2050 RTP Revenue Constrained Plan and the 2010 Regional Transportation Improvement Program (RTIP) Amendment No. 13 (Agenda Item No. 10) with the State Implementation Plans for air quality. This process, which is required by federal law, involves estimating regional vehicle emissions resulting from the Revenue Constrained Plan and making a determination that they meet established emissions budgets.

**2050 Regional Growth Forecast**

In February 2010, the Board of Directors accepted the 2050 Regional Growth Forecast for planning purposes. Since that time there have been minor revisions to local land use inputs to reflect the most current draft of plans that were in progress when the forecast was first presented to the Board. Land use plan changes reflected in the final forecast were included only at the request of the local jurisdictions. These revisions were minimal. This technical update was reviewed by the Regional Planning Technical Working Group, and by the Regional Planning Committee, and was accepted by the Board, for release with the Draft 2050 RTP/SCS in April 2011. There have been no changes since that time. Attachment 3 summarizes the Final 2050 Regional Growth Forecast.

**California Air Resources Board (CARB) Meeting**

On September 22, 2011, CARB heard an informational report on the SANDAG Draft SCS and an update on SCS development in other regions in California. Based on comments provided at the CARB meeting, RTP implementation actions for developing an Early Action Program for Active Transportation and a regional Complete Streets policy have been strengthened (2050 RTP/SCS Chapter 6, Actions No. 45 and 54). In addition, an implementation action was revised to clarify that alternative land use scenarios will be evaluated as part of the next Regional Comprehensive Plan update (2050 RTP/SCS Chapter 3, Action No. 1). Finally, an action was added to continue to make enhancements to travel demand models to improve estimates of greenhouse gas (GHG) and vehicle miles traveled (2050 RTP/SCS Chapter 3, Action No. 12).

**Final 2050 RTP and its SCS**

At its September 16, 2011, meeting, the Board accepted the proposed modifications to the Draft 2050 RTP. The changes were incorporated into the Final 2050 RTP.

Attachment 4 is the resolution adopting the air quality conformity determination for the 2050 RTP and redetermination of the 2010 RTIP, finding that the SCS achieves the greenhouse gas reduction targets established by CARB, and adopting the 2050 RTP, including its SCS, and the Final 2050 Regional Growth Forecast.
**Next Steps**

Following the above Board actions, staff will submit the Final 2050 RTP/SCS to the U.S. Department of Transportation (USDOT) and the U.S. Environmental Protection Agency, and request that USDOT make its air quality conformity determination prior to December 10, 2011. The Final 2050 RTP/SCS also will be submitted to CARB to confirm the preliminary determination by its staff that implementation of the SCS would achieve the regional GHG reduction targets.

GARY L. GALLEGOS  
Executive Director

Attachments: 1. Resolution No. 2012-08 certifying the Final Environmental Impact Report prepared for the 2050 Regional Transportation Plan/ Sustainable Communities Strategy (SCH# 2010041061), and adopting Environmental Findings pursuant to the CEQA (1A); a Statement of Overriding Considerations (1B); and a Mitigation Monitoring and Reporting Program (1C)  
2. Appendix B: Air Quality Planning and Transportation Conformity  
3. Final 2050 Regional Growth Forecast – Population, Jobs, and Housing by Jurisdiction (October 2011)  
4. Resolution No. 2012-09 adopting the Air Quality Conformity Determination, Finding the SCS achieves the Regional GHG Reduction Targets, and Adopting the Final 2050 Regional Growth Forecast, the 2050 San Diego RTP, including its SCS

Note: Printed copies of the 2050 RTP, including its SCS and Final EIR have been mailed to Board Members and Advisory Members along with a DVD containing the RTP Technical Appendices. The 2050 RTP, including Appendices, Technical Appendices, and the Executive Summary in Spanish, as well as the Final EIR and its Appendices may be obtained from the SANDAG Web site at www.sandag.org/2050rtp. DVDs containing all documents will be available free of charge by contacting the SANDAG Public Information Office at (619) 699-1950. Copies of the Final 2050 RTP and Appendices as well as the EIR in printed format may be purchased for the cost of reproduction.

Key Staff Contacts:  
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Rob Rundle, (619) 699-6949, rru@sandag.org
A RESOLUTION OF THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)
BOARD OF DIRECTORS CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT
PREPARED FOR THE 2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES
STRATEGY (SCH#2010041061), AND ADOPTING ENVIRONMENTAL FINDINGS PURSUANT TO THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT; A STATEMENT OF OVERRIDING CONSIDERATIONS;
AND A MITIGATION MONITORING AND REPORTING PROGRAM

WHEREAS, the 2050 Regional Transportation Plan/Sustainable Communities Strategy
(“Project”) proposes and encompasses the planning foundation for transportation improvements
and regional growth throughout the San Diego region through 2050; and

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

WHEREAS, SANDAG prepared a Programmatic Environmental Impact Report ("EIR")
(SCH# 2010041061) and provided full disclosure and programmatic analysis of the potential and
significant environmental effects of the Project; and

WHEREAS, SANDAG issued a Notice of Preparation ("NOP") of a Draft EIR on April 19,
2010, and circulated the NOP for a period of 30 days pursuant to State CEQA Guidelines §§15082(a),
15103 and 15375; and

WHEREAS, SANDAG issued a notice of time extension for the NOP on May 17, 2010, and
provided an additional 30-day comment period on the NOP; and

WHEREAS, pursuant to State CEQA Guidelines §15206 and §15082, SANDAG publicly
noticed and held five public scoping meetings in April and May, 2010 for the purpose of soliciting
comments from the public and potential responsible and trustee agencies, including details about
the scope and content of the environmental information related to the responsible and trustee
agencies’ areas of statutory responsibility, as well as the significant environmental issues, reasonable
alternatives, and mitigation measures that the responsible and trustee agencies would need to have
analyzed in the Draft EIR; and

WHEREAS, approximately 22 written statements were received by SANDAG in response
to the NOP, which assisted SANDAG in narrowing the issues and alternatives for analysis in the Draft
EIR; and

Attachment 1
WHEREAS, a Draft EIR was completed and released for public review on June 7, 2011, and SANDAG initiated a 55-day public comment period by filing a Notice of Completion and Notice of Availability with the State Office of Planning and Research; and

WHEREAS, pursuant to Public Resources Code §20192, SANDAG also provided a Notice of Availability to all organizations and individuals who had previously requested such notice and published a Notice of Availability for the Draft EIR on or about June 7, 2011, in a newspaper of general circulation. In addition, SANDAG placed copies of the Draft EIR at the offices of SANDAG and on its Web site; and

WHEREAS, during the 55-day comment period, SANDAG consulted with and requested comments from responsible and trustee agencies, other regulatory agencies, and others pursuant to State CEQA Guidelines §15086; and

WHEREAS, during the official public review period for the Draft EIR, SANDAG received approximately 18 written comment letters, which are included in the Final EIR; and

WHEREAS, after the official public review period for the Draft EIR, SANDAG received four additional written comment letters, which also are included in the Final EIR; and

WHEREAS, SANDAG evaluated all comments on environmental issues received during the comment period on the Draft EIR and prepared written responses to these comments, which are included in the Final EIR; and

WHEREAS, SANDAG prepared the Final EIR, consisting of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A-F); and (3) comments and recommendations received on the Draft EIR, a list of persons, organizations, and public agencies commenting on the Draft EIR, SANDAG responses to significant environmental points raised in the review and consultation process, Master Responses to comments and other information (bound separately as “Appendix G”); and

WHEREAS, pursuant to Public Resources Code §21092.5 and CEQA Guidelines §15088, SANDAG provided proposed written responses to all agencies, organizations, and individuals that submitted comments on the Draft EIR at least ten days prior to certification of the EIR; and

WHEREAS, SANDAG made the Final EIR publically available on its Web site on October 18, 2011; and

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

WHEREAS, the Final EIR sufficiently analyzes both the feasible mitigation measures necessary to avoid or substantially lessen the Project’s significant environmental impacts and a reasonable range of alternatives capable of eliminating or reducing these effects in accordance with CEQA and the State CEQA Guidelines; and
WHEREAS, all of the findings and conclusions made by SANDAG pursuant to this Resolution are based upon the oral and written evidence presented to it as a whole not based solely on the information provided in this Resolution; and

WHEREAS, the SANDAG Board of Directors, at a regular session assembled on October 28, 2011, considered the significant environmental impacts of the 2050 RTP/SCS, including, but not limited to, the Final EIR, written and oral testimony given at meetings and hearings, and submission of testimony from the public, organizations, and regulatory agencies; and

WHEREAS, no comments made in the public hearings conducted by SANDAG, or any additional information submitted to SANDAG, have produced significant new information requiring recirculation or additional environmental review under State CEQA Guidelines §15088.5; and

WHEREAS, SANDAG has prepared CEQA Findings in compliance with Public Resources Code §§21081 and 21081.5 and CEQA Guidelines Section §15091 for every significant impact of the 2050 RTP/SCS identified in the EIR and for each alternative evaluated in the EIR, including an explanation of the rationale for each finding (attached hereto as Attachment 1A); and

WHEREAS, the 2050 RTP/SCS will have significant impacts that cannot be fully mitigated to less than significant, and SANDAG has prepared a Statement of Overriding Considerations in compliance with Public Resources Code §21081 and CEQA Guidelines §15093 (attached hereto as Attachment 1B), which concludes that specific economic, legal, social, technological, and other benefits of the 2050 RTP/SCS outweigh the significant and unavoidable impacts identified in the EIR; and

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

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

WHEREAS, prior to taking action on the Project, the SANDAG Board of Directors has heard, been presented with, reviewed, and considered all of the information and data in the administrative record, including the Final EIR, and all oral and written evidence presented to it during all meetings and hearings;

NOW THEREFORE

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

BE IT FURTHER RESOLVED that the SANDAG Board of Directors finds that the Final EIR consists of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A-F); and (3) comments and recommendations received on the Draft EIR, a list of persons, organizations, and public agencies commenting of the Draft EIR, SANDAG responses to significant environmental points raised in the review and consultation process, Master Responses to comments and other information (bound separately as “ Appendix G”); and
BE IT FURTHER RESOLVED that, pursuant to CEQA Guidelines § 15090, the SANDAG Board of Directors certifies that the Final EIR (SCH# 2010041061) has been completed in compliance with the CEQA (Public Resource Code §21000 et seq.), that the Final EIR was presented to and reviewed and considered by the SANDAG Board of Directors prior to approving the Project, and that the Final EIR represents the independent judgment and analysis of SANDAG; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors makes and adopts the Findings required in CEQA Guidelines §15091, which are attached hereto as Attachment 1A and incorporated fully by this reference; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors adopts the Statement of Overriding Considerations as required by CEQA Guidelines §15093, which is attached hereto as Attachment 1B and incorporated fully by this reference; and

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

PASSED AND ADOPTED this 28th day of October, 2011.
ATTACHMENT 1A
CEQA FINDINGS OF FACT

I. INTRODUCTION TO CEQA FINDINGS

These findings are made pursuant to the California Environmental Quality Act (Pub. Res. Code §21000 et seq., “CEQA”) and the CEQA Guidelines (Cal. Code Regs. title 14, §15000 et seq.) by the Board of Directors of the San Diego Association of Governments (“SANDAG”) as the lead agency for the 2050 Regional Transportation Plan/Sustainable Communities Strategy (“2050 RTP/SCS” or the “Project”). These findings pertain to Environmental Impact Report (“EIR”) SCH #2010041061.

A. PROJECT DESCRIPTION SUMMARY

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

The 2050 RTP/SCS is the blueprint for a regional transportation system, serving existing and projected residents and workers within the San Diego region over the next 40 years. The 2050 RTP/SCS looks ahead 40 years to accommodate another 1.2 million residents, half a million new jobs, and nearly 400,000 new homes. The 2050 RTP/SCS envisions most of these new jobs and homes situated within sustainable communities, conducive to transit, walking and bicycling. To achieve this goal, future growth will be more compact in nature, and focused in the western portion of the region along major transit and transportation corridors. This more compact development pattern will create more active mixed-use communities, while allowing for the protection of more open space land in the eastern portion of the region. The 2050 RTP/SCS includes the County of San Diego, which is bounded by Orange and Riverside counties to the north, Imperial County to the east, the country of Mexico to the south, and the Pacific Ocean to the west.

As part of the regional transportation planning process, SANDAG also prepared a Sustainable Communities Strategy (“SCS”). Passed in 2008, Senate Bill (SB) 375 encourages planning practices that create sustainable communities. SB 375 charged the California Air Resources Board (“CARB”) with setting regional targets for greenhouse gas (“GHG”) emissions from passenger cars and light-duty trucks for 2020 and 2035. Pursuant to SB 375, each MPO is required to adopt an SCS as part of its RTP and, using the most recent planning assumptions, demonstrate achievement of the targets for reduction of GHGs. The purpose of an SCS is to align regional transportation, housing, and land use plans to reduce the amount of vehicle miles traveled to attain the regional GHG reduction target. If the SCS is unable to achieve the GHG reduction targets, the MPO is required to prepare an alternative planning strategy.

Building on the current (2010) transportation system with funding anticipated over the next 40 years, the 2050 RTP/SCS outlines projects for rail and bus services, highways, local streets, bicycling, and walking, as well as systems and demand management. The result of this process will be an integrated, multimodal transportation system by mid-century. The 2050 RTP/SCS shows how the region will meet the GHG targets for passenger cars and light-duty trucks established by
CARB for 2020 and 2035 by using land in a way that makes development more compact, conserving open space, and investing in a transportation network that reduces vehicle miles travelled and gives residents alternative transportation options.

B. PROJECT OBJECTIVES

The following are the fundamental objectives for the 2050 RTP/SCS:

1. Provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns that:
   - Accommodates the region’s future employment and housing needs, and protects sensitive habitat and resource areas;
   - Manages transportation system demands and transportation system efficiency in innovative ways;
   - Meets GHG emissions targets for passenger cars and light-duty trucks: per capita CO2 reductions of 7 percent by 2020 and 13 percent by 2035 (compared to a 2005 baseline) levels;
   - Improves air quality in the region; and
   - Makes transportation investments that result in healthy and sustainable communities.

2. Provide a safe regional transportation system by:
   - Improving operations to increase safety,
   - Maintaining the system in a good state of repair, and
   - Improving emergency preparedness.

3. Provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs by:
   - Making system improvements to better connect people with jobs and other activities;
   - Offering convenient travel choices, including transit, intercity and high-speed trains, driving, ridesharing, walking, and biking;
   - Preserving and expanding options for regional freight movement;
   - Increasing the use of transit, ridesharing, walking, and biking; and
   - Offering transportation choices to better connect the San Diego region with Mexico, neighboring counties, and tribal nations.

4. Provide a transportation system that supports improvement of the region’s standard of living by:
   - Using transportation investments to create economic benefits; and
   - Enhancing the goods movement system to support economic prosperity.

5. Provide a reliable transportation system that offers relatively consistent travel times by mode from day to day by:
• Employing new technologies to make travel more reliable and convenient; and
• Managing the efficiency of the transportation system to improve traffic flow.

6. Provide a transportation system that offers an equitable level of service for all populations by:

• Creating equitable transportation opportunities for all communities of concern; and
• Ensuring access to jobs, services, and recreation for populations with fewer transportation choices.

C. TYPE OF EIR

The 2050 RTP/SCS EIR is a Program EIR. A Program EIR is prepared for a series of actions that can be characterized as one project. An advantage of a Program EIR is that it allows the lead agency to consider broad policy alternatives and “program wide mitigation measures” at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts. (CEQA Guidelines §15168(b)(4).) The Program EIR can serve as a first-tier document for later CEQA review of individual projects included in the program. These project-specific CEQA reviews will focus on project-specific impacts and mitigation measures, and need not repeat the broad analyses contained in the Program EIR. As discussed by the California Supreme Court, “it is proper for a lead agency to use its discretion to focus a first-tier EIR on only the…program, leaving project-specific details to subsequent EIRs when specific projects are considered.” (In re Bay Delta (2008) 43 Cal. 4th 1143, 1174).

D. PROCEDURAL COMPLIANCE WITH CEQA

SANDAG published a Draft Environmental Impact Report (EIR) on June 7, 2011 and a Final EIR on October 18, 2011 in compliance with CEQA requirements. The Final EIR has been prepared for SANDAG in accordance with CEQA and the CEQA Guidelines, as amended. As allowed for in CEQA Guidelines §15084(d)(2), SANDAG retained a consultant to assist with the preparation of the environmental documents. SANDAG, acting as lead agency, has directed, reviewed and edited as necessary all material prepared by the consultant, and such material reflects SANDAG’s independent judgment. The key milestones associated with preparation of the EIR are summarized below. In general, the preparation of the EIR included the following key steps and public notification efforts:

• The thirty-day scoping process began with SANDAG’s issuance of the Notice of Preparation (NOP) of an EIR on April 19, 2010.
• The NOP was filed with the State Clearinghouse on April 19, 2010. The comment period on the NOP was extended an additional 30 days to June 18, 2010.
• SANDAG held a series of five scoping meetings throughout the San Diego region to gather further feedback on the scope and content of the environmental information to be addressed in the 2050 RTP/SCS EIR. Attendees included representatives from SANDAG’s Regional Planning Technical Working Group, Regional Planning Stakeholders Working Group, and members of the public.
• SANDAG also implemented a comprehensive public outreach and involvement program to support the development of the 2050 RTP/SCS. The 2050 RTP Public Involvement Program is based on the SANDAG Public Participation Plan, which was adopted by the
SANDAG Board of Directors in 2009. The 2050 RTP Public Involvement Plan outlines specific activities for communicating with the public throughout the development of the RTP. SANDAG prepared the Public Involvement Plan with input from the general public, the Regional Planning Stakeholders Working Group, the Policy Advisory Committees, and the Board of Directors. Parallel to this effort, a tribal consultation work plan was developed.

- SANDAG issued the Draft EIR on June 7, 2011.
- The Notice of Availability for the Draft EIR was published in local newspapers and mailed to an extensive distribution list. The Draft EIR was also posted on SANDAG’s website. In addition, Draft EIRs were distributed to those who provided comments on the NOP, the SANDAG Board of Directors, managers of all 19 SANDAG jurisdictions, and public libraries throughout the region.
- The Notice of Completion for the Draft EIR was filed with the State Clearinghouse on June 7, 2011.
- Seven informational workshops and public hearings were held in June of 2011.
- The Draft EIR was available for a 55-day public review period starting June 7, 2011.
- SANDAG revised the Draft EIR, including the Project description, in response to comments received during the public review period and provided written responses addressing all significant environmental issues raised. Revisions made to the Draft EIR are shown throughout the Final EIR in strikethrough and underline text.
- SANDAG published the Final EIR on October 18, 2011.
- SANDAG provided written proposed responses to all public agencies that commented on the Draft EIR at least 10 days prior to certifying the EIR.
- The SANDAG Board of Directors held a public hearing on October 28, 2011 to consider certification of the Final EIR.

E. INCORPORATION OF FINAL EIR BY REFERENCE

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

II. FINDINGS REGARDING ENVIRONMENTAL IMPACTS

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

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (The concept of infeasibility also encompasses whether a particular alternative or mitigation measure promotes the Project’s underlying goals and objectives, and whether an alternative or mitigation measure is impractical or undesirable from a policy standpoint. (See City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 410; California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957.))

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

The EIR evaluation included a detailed analysis of impacts in 17 environmental topics, analyzing the Project and alternatives, including a No Project Alternative. The EIR disclosed the environmental impacts expected to result from the adoption and implementation of the 2050 RTP/SCS. Feasible mitigation measures were identified to avoid or minimize significant environmental effects.

III. FINDINGS REGARDING ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT

Public Resources Code § 21081 and CEQA Guidelines § 15091 do not require findings of fact for impacts that are less than significant. Nevertheless, for the sake of completeness, the SANDAG Board of Directors hereby finds that the following environmental impacts of the 2050 RTP/SCS) either have no impact or are less than significant. These findings are based on the discussion of impacts in the detailed issue area analyses in Section 4.0 of the EIR and the cumulative impacts discussed in Section 5.0 of the EIR. Under CEQA, no mitigation measures are required for impacts that are less than significant (CEQA Guidelines § 15126.4(a)(3)).

A. AGRICULTURE AND FOREST RESOURCES (EIR SECTION 4.2)

FR-1 Conflict with existing zoning for, or cause rezoning of “Timberland” or “Timberland Production Zone” as defined in the California Timberland Productivity Act of 1982 (2020, 2035, 2050)

The SANDAG Board of Directors finds that the San Diego region does not contain any lands designated as “timberland” or as a TPZ. Therefore, implementation of the 2050 RTP/SCS would not result in significant impacts related to timberland in 2020, 2035, or 2050 and does not represent a contribution to a cumulatively significant impact.

B. AIR QUALITY (EIR SECTION 4.3)

AQ-1 (Impact associated with transportation network improvements) Conflict with or obstruct the implementation of applicable air quality plans (2020, 2035, 2050)
The SANDAG Board of Directors finds that Emission Factors (EMFAC) modeled emissions of O₃ precursors ROG and NOₓ and CO for the transportation improvements by 2020, 2035 and 2050 (located in Appendix B and summarized in Tables 4.3-3 and 4.3-4) would be less than the conformity budget emissions for these pollutants; thereby demonstrating that the emissions would not be greater than the emissions anticipated by the 8-hour O₃ attainment plan, the O₃ SIP, and the CO SIP. Therefore, implementation of the 2050 RTP/SCS would result in less than significant impacts related to transportation network improvements. The 2050 RTP/SCS's impacts associated with conflicting or obstructing the implementation of applicable air quality plans, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, freight rail infrastructure and impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

AQ-5 Expose a substantial number of people to objectionable odors (2020, 2035, 2050)

The SANDAG Board of Directors finds that odor sources within the SANDAG region, such as agricultural operations, wastewater treatment facilities, and landfills, are controlled by city and county odor policies enforced by APCD, including Rule 51 and County Code Sections 63.401 and 63.402, which prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors.

Odor analyses related to regional growth/land use change and transportation improvements in the 2050 RTP/SCS would be completed at the project level, once facility designs of individual projects are available. However, these projects would not be expected to result in substantial odor emissions or affect a substantial number of people when compared to existing conditions, since the characteristics of future development are expected to be similar to existing development, and existing regulations control sources of odor that might otherwise affect a substantial number of people. Therefore, the impact is less than significant. The 2050 RTP/SCS’s generation of odor emissions, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, freight rail infrastructure and impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

C. CULTURAL RESOURCES AND PALEONTOLOGY (EIR SECTION 4.5)

CULT-2 Disturb any human remains (2020, 2035, 2050)

The SANDAG Board of Directors finds that ground-disturbing activities associated with the implementation of the 2050 RTP/SCS regional growth/land use changes and transportation improvements have the potential to uncover or disturb buried human remains. Impacts associated with the disturbance of human remains would be less than significant because existing laws and regulations would reduce the potential for encountering human remains and ensure the appropriate disposition of any human remains that are encountered. Therefore, the impact is less than significant. The 2050 RTP/SCS’s impacts associated with the disturbance of human remains
in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

D. ENVIRONMENTAL JUSTICE (EIR SECTION 4.6)

EJ-1 Result in substantially fewer mobility benefits to environmental justice communities (2020, 2035, 2050)

Please note that an environmental justice section is not required by CEQA. Nevertheless, equity-based goals and performance measures for the 2050 RTP/SCS regional growth/land use changes and transportation network improvements were calculated by SANDAG in four specific contexts for minority and non-minority TAZs, low-income and non-low-income TAZs, low mobility and non-low mobility TAZs, and TAZs with low and non-low community engagement. The four specific contexts included:

- Average travel time per person trip (in minutes),
- Commute trips within 30 minutes,
- School trips within 30 minutes, and
- Percentage of homes within 0.5 mile of a transit stop.

For each context, there was a less than 10 percent difference between the environmental justice communities and other communities resulting in a less than significant impact.

Large clusters and contiguous areas of environmental justice communities are present in all of the defined transportation corridors. The clusters are throughout the San Diego region, concentrated in already urbanized areas along the coast, only noticeably absent in the Carmel Valley area and in some areas near Del Mar and La Jolla. The distribution of planned transportation improvements is spread throughout the urban and suburban reaches of the county. The adjacency of environmental justice communities allows equitable access to the mobility-based benefits of the 2050 RTP/SCS, facilitating an equitable level of service for the surrounding communities, resulting in a less than significant impact. The 2050 RTP/SCS’s impacts on mobility of environmental justice communities in combination with similar impacts that would result from the California High Speed Rail Train System, extensions of the California Coastal Trail, a new petroleum pipeline, and increased rail capacity, as well as impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the SANDAG Board of Directors finds that the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

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

GEO-1 Expose people or structures to potential substantial significant impacts, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and landslides (2020, 2035, 2050)
The SANDAG Board of Directors finds that implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements that would expose a greater number of people and structures to impacts from seismic activity, including earthquakes, ground shaking, ground failure, and landslides. However, adherence to existing laws, regulations, and programs would ensure people or structures would not be exposed to substantial adverse effects, and these impacts would therefore be less than significant. The 2050 RTP/SCS’s impacts associated with exposing additional people and structures to geologic and seismic hazards such as ground shaking, fault rupture, liquefaction, earthquake-induced landslides, in combination with similar impacts that would result from the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, as well as impact projections in the SCAG 2008 RTP and other infrastructure projects and development associated with adopted land use plans for local jurisdictions throughout the southern California and northern Baja region, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**GEO-2 Locate projects on an unstable geologic unit or soil that is unstable (2020, 2035, 2050)**

The SANDAG Board of Directors finds that implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements that would expose a greater number of structures to risks from unstable soils, including landslides, lateral spreading, subsidence, liquefaction, or collapse, or cause soils to become unstable. However, adherence to existing laws and regulations would minimize the potential for projects located on unstable geologic units to cause risks to life or property, and ensure impacts would be less than significant. The 2050 RTP/SCS’s impacts associated with locating projects on an unstable geologic unit or soil that is unstable, in combination with similar impacts that would result from the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, as well as impact projections in the SCAG 2008 RTP and other infrastructure projects and development associated with adopted land use plans for local jurisdictions throughout the southern California and northern Baja region, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**GEO-4 Locate projects on expansive soil (2020, 2035, 2050)**

The SANDAG Board of Directors finds that implementation of the 2050 RTP/SCS would result in regional growth development and transportation network improvements that would be constructed on expansive soils. However, adherence to existing laws and regulations would minimize the potential for projects located on expansive soils to create substantial risks to life or property, and this impact would therefore be less than significant. The 2050 RTP/SCS’s impacts associated with locating projects on expansive soil, in combination with similar impacts that would result from the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, as well as impact projections in the SCAG 2008 RTP and other infrastructure projects and development associated with adopted land use plans for local jurisdictions throughout the southern California and northern Baja region, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.
F. GREENHOUSE GAS EMISSIONS (EIR SECTION 4.8)

GHG-1 Increase GHG emissions over existing (2010) levels (2020).

The SANDAG Board of Directors finds that GHG emissions from land use changes and transportation network improvements in 2020 are expected to be lower than GHG emissions in 2010, when state-level measures are taken into account. Emissions estimates for transportation and land use in 2020 are 26.41 MMT CO2e, while in 2010, emissions were 28.85 MMT CO2e. Thus, implementation of the 2050 RTP/SCS would not substantially increase the GHG emissions from 2010 levels, would result in less than a significant impact in 2020. The 2050 RTP/SCS’s impacts to GHG emissions, in combination with similar impacts that would result from the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from the AB 32 Scoping Plan would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

GHG-1 (Impact associated with transportation network improvements) Increase GHG emissions over existing (2010) levels (2035).

The SANDAG Board of Directors finds that while GHG emissions from transportation network improvements in 2035 are expected to be greater than in 2010, transportation-related GHG emissions are expected to be lower than in 2010, when state-level measures are taken into account. Emissions estimates for transportation network improvements in 2035 are 12.88 MMT CO2e/yr, while in 2010, transportation baseline emissions were 14.31 MMT CO2e/yr. Thus, implementation of the 2050 RTP/SCS would not increase transportation-related GHG emissions above baseline levels. Therefore, implementation of the 2050 RTP/SCS transportation network improvements would not substantially increase the GHG emissions from 2010 levels, and would result in less than a significant impact in 2035. The 2050 RTP/SCS’s impacts to GHG emissions, in combination with similar impacts that would result from the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from the AB 32 Scoping Plan would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

GHG-2 Conflict with SB 375 GHG emission reduction targets (2020, 2035)

The SANDAG Board of Directors finds that the California Air Resources Board (ARB) requires SANDAG to reduce per capita carbon dioxide (CO₂) emissions from passenger cars and light-duty trucks 7 percent below 2005 levels by 2020. Implementation of the proposed 2050 RTP/SCS would lead to land use changes and transportation improvements that reduce congestion, increase transit options, and encourage biking and walking. SANDAG has estimated that the per capita 2005 emissions from passenger vehicles resulted in 26.4 lbs CO₂e/person/day in the region. SANDAG modeled emissions for passenger vehicles in 2020 using EMFAC 2007 and the Pavley Post Processor and estimated the per capita emissions would be 23.6 lbs CO₂e/person/day, resulting in a 14 percent reduction from 2005 levels, exceeding the 7 percent target set by ARB. Therefore, the impact is less than significant.

ARB also requires SANDAG to reduce per capita GHG emissions from passenger cars and light-duty trucks 13 percent below 2005 levels by 2035. As with 2020, the 2050 RTP/SCS includes
proposed transportation improvements that would lead to reduced congestion and increased transit options. SANDAG modeled emissions for passenger vehicles in 2035 and estimated the per capita emissions would be 23.9 lbs CO$_2$e/person/day, resulting in a 13 percent reduction from 2005 levels, meeting the 13 percent target set by ARB for SANDAG. Therefore, the impact is less than significant.

Because ARB has not developed a target for 2050, there would not be any impact in that year.

The 2050 RTP/SCS’s conflicts with SB 375’s GHG emission reduction targets, in combination with similar impacts that would result from the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from the AB 32 Scoping Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**GHG-3 Conflict with applicable GHG reduction plans (2020, 2035, 2050)**

The SANDAG Board of Directors finds that land use changes and transportation improvements within the 2050 RTP/SCS emphasize compact urban development near transit and focus transportation network improvements where transit is encouraged and traffic flow efficiency is maximized through demand and system management. These are aligned with the policies outlined in the SANDAG Climate Action Strategy (CAS) and therefore implementation of the 2050 RTP/SCS in 2020, 2035 and 2050 would not impede the CAS and would constitute a less than significant impact.

Land-use GHG emissions in 2020 are expected to be greater than the GHG emissions target set by AB 32, while transportation-related GHG emissions are expected to be lower than the target. The total emissions expected in 2020 would be 26.41 MMT CO$_2$e for land use and transportation-related emissions and accounting for state measures (Table 4.8-17). According to AB 32, emissions in 2020 must be equal to 1990 levels, or 15 percent below 2005 levels. Based on the forecasted inventories described above, this would require emissions to be no greater than 25.11 MT CO$_2$e in 2020. The forecasted emissions are greater than 25.11 MMT CO$_2$e; therefore, implementation of the 2050 RTP/SCS would lead to an overall increase in GHG emissions compared to 2005 levels. AB 32 does not contain emission reduction targets for 2035 and 2050.

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<th>Table 4.8-17</th>
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<tr>
<td>SANDAG Regional Transportation GHG Emissions, 2020</td>
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<td>2020 MMT CO$_2$e</td>
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<td>Land-Use GHG Emissions</td>
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<td>Net Forecast GHG Emissions</td>
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<td>AB 32 Target (15% below 2005 levels by 2020)</td>
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The ARB Scoping Plan sets out additional reductions that would achieve the goals of AB 32 if fully implemented. As of this writing, many of the policies in the Scoping Plan have not been implemented, such as cap-and-trade, and therefore are not quantified in the GHG reductions that may be achieved. In addition, SANDAG is one of many agencies that will work to achieve the goals of AB 32. Through the 2050 RTP/SCS, the goals of the Scoping Plan are further encouraged and promoted through compact development, mixed-use development, and transit-
oriented transportation. Therefore, the 2050 RTP/SCS assists and does not impede the Scoping Plan, and the impact is less than significant.

The 2050 RTP/SCS’s conflicts with applicable GHG reduction plans, in combination with similar impacts that would result from the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from the AB 32 Scoping Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

G. HAZARDS AND HAZARDOUS MATERIALS (EIR SECTION 4.9)

HM-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (2020, 2035, 2050)

The SANDAG Board of Directors finds that an increase in regional growth, land use development, and transportation network improvements is anticipated by 2020, 2035 and 2050 thereby increasing the risk of hazards to the public and/or the environment through the routine transport, use, or disposal of hazardous materials. However, adherence to existing regulations would ensure that a significant hazard to the public or the environment would not be created through the routine transport, use, or disposal of hazardous materials. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with the creation of a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, freight rail infrastructure and impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

HM-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (2020, 2035, 2050)

The SANDAG Board of Directors finds that an increase in regional growth, land use development, and transportation network improvements is anticipated by 2020, 2035 and 2050 thereby increasing the risk related to the release of hazardous materials into the environment. However, adherence to existing regulations would ensure that a significant hazard to the public or the environment would not be created due to upset or accident conditions involving the release of hazardous materials into the environment. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, freight rail infrastructure, and impact projections in the SCAG 2008 RTP and the California-Baja California...
Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**HM-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter-mile of an existing or proposed school (2020, 2035, 2050)**

The SANDAG Board of Directors finds that an increase in regional growth, land use development, and transportation network improvements is anticipated by 2020, 2035 and 2050 thereby increasing the risk related to the handling and emission to hazardous materials near schools. However, adherence to existing regulations would ensure that risks associated with the handling or emissions of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be minimized. Therefore, this impact is less than significant. The 2050 RTP/SCS's impacts associated with hazardous emissions or the handling of hazardous or acutely hazardous materials, substance or waste near schools, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, freight rail infrastructure, and impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**HM-4 Be located on hazardous materials sites (2020, 2035, 2050)**

The SANDAG Board of Directors finds that by 2020, 2035 and 2050, increased regional growth, land use development and construction of transportation network improvements may occur through, or next to, Cortese sites that are currently listed, or sites to be listed in the future as they are discovered. Adherence to existing regulations would ensure that a significant hazard to the environment would not be created through a project being located on or near a hazardous materials site. Therefore, this impact is less than significant and does not represent a contribution to a cumulatively significant impact.

**HM-5 Result in a safety hazard for people residing or working in the project area for projects located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport (2020, 2035, 2050)**

The SANDAG Board of Directors finds that by 2020, 2035 and 2050, increased regional growth, land use development and construction of transportation network improvements would occur near public or military airports. Adherence to existing regulations would minimize safety hazards associated with airports. Therefore, this impact is less than significant and does not represent a contribution to a cumulatively significant impact.
**HM-6 Result in a safety hazard for people residing or working in the project area for projects within the vicinity of a private airstrip or helipad (2020, 2035, 2050)**

The SANDAG Board of Directors finds that by 2020, 2035 and 2050, increased regional growth, land use development and construction of transportation network improvements would occur near private airstrips or helipads. Adherence to existing regulations would minimize safety hazards associated with private airstrips and helipads. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with safety hazards for people residing or working in the project area for projects within the vicinity of a private airstrip or helipad, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airporth expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, freight rail infrastructure, and impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**HM-7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (2020, 2035, 2050)**

The SANDAG Board of Directors finds that by 2020, 2035 and 2050, increased regional growth, land use development and transportation network improvements may cause obstruction for emergency response vehicles or result in activities that would cause physical interference in the implementation of an emergency response or evacuation plan. However, adherence to the existing regulations would ensure development and transportation projects would not impair implementation of or physically interfere with an emergency response or evacuation plan. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with impairing implementation of or physically interfering with an adopted emergency plan in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airporth expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, freight rail infrastructure, and impact projections in the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**H. HYDROLOGY AND WATER QUALITY (EIR SECTION 4.10)**

**WQ-1 Violate any water quality standards or waste discharge requirements (2020, 2035, 2050)**

The SANDAG Board of Directors finds that for 2020, 2035 and 2050, compliance with existing regulatory requirements would ensure that the 2050 RTP/SCS regional growth/land use changes and transportation network improvements would not violate water quality standards or WDRs, and this impact would be less than significant. The 2050 RTP/SCS’s violation of water quality standards or waste discharge requirements, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airporth expansions in the San Diego region and Tijuana International Airport,
port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from adopted plans within the southern California region, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**WQ-3 Place within a 100-year flood hazard area structures that would impede or redirect flood flows (2020, 2035, 2050)**

The SANDAG Board of Directors finds that for 2020, 2035 and 2050 compliance with existing regulatory requirements would ensure that the 2050 RTP/SCS regional growth/land use changes and transportation network improvements would not place structures within a 100-year flood hazard zone that would impede or redirect flood flows, to the maximum extent practicable. However, conditions may arise where 100-year flood hazards cannot be avoided and redirection of flood flows may be necessary. Where flood hazards pose dangers to public safety, project-level designs would consider elevation changes for roadway features that avoid floodplain hazards. In such cases, floodplain boundary revisions would be necessary through the preparation of a Conditional Letter of Map Revision (CLOMR), which would be submitted to FEMA. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with placing structures within a 100-year flood hazard zone, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from adopted plans within the southern California region, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**WQ-4 Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam (2020, 2035, 2050)**

The SANDAG Board of Directors finds that for 2020, 2035 and 2050, compliance with existing regulatory requirements would ensure that the 2050 RTP/SCS regional growth/land use changes and transportation network improvements would not expose people or structures to a significant risk of loss, injury, or death from flooding. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with exposing people or structures to a significant risk of loss, injury or death involving flooding, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from adopted plans within the southern California region, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**WQ-5 Expose people or structures to a significant risk of inundation by seiche, tsunami, or mudflow (2020, 2035, 2050)**

The SANDAG Board of Directors finds that for 2020, 2035 and 2050, compliance with existing regulatory requirements would ensure that the 2050 RTP/SCS regional growth/land use changes and transportation network improvements would not expose people or structures to a significant risk of inundation due to seiche, tsunami, or mudflow. Therefore, this impact is less than
significant. The 2050 RTP/SCS’s impacts associated with exposing people or structures to a significant risk of inundation by seiche, tsunami or mudflow, in combination with similar impacts that would result from related infrastructure projects planned in the southern California and northern Baja region, including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and impact projections from adopted plans within the southern California region, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

I. LAND USE (EIR SECTION 4.11)

**LU-1 (Impact associated with regional growth/land use changes) Directly or indirectly cause substantial deterioration of community cohesion or character, including substantial residential or business displacement (2020, 2035)**

The SANDAG Board of Directors finds that in 2020 and 2035, development projects implementing the 2050 RTP/SCS regional growth/land use changes will increase compact and sustainable development in existing cities. This development is generally compatible within existing urban environments, and the growth of rural residential uses around existing communities is not so expansive that community character or cohesion would be substantially compromised. Therefore, in 2020 and 2035 the 2050 RTP/SCS would not directly or indirectly cause substantial deterioration of community cohesion or character, including substantial residential or business displacement. This impact is less than significant. The 2050 RTP/SCS’s impacts associated with substantial deterioration of community cohesion or character, in combination with similar impacts that would result from related infrastructure projects such as the California High Speed Rail Train System (HST) and prospective future expansion or improvement of existing airport facilities or new airport development in the region as well as from impact projections from adopted plans including the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**LU-2 (Impact associated with regional growth/land use changes) substantially conflict or impede the implementation of existing land use plans and policies, including general plans and specific plans (2020, 2035)**

The SANDAG Board of Directors finds that in 2020 and 2035, development projects implementing the 2050 RTP/SCS transportation network improvements will increase compact and sustainable development in existing cities. This development is generally compatible with land use plans and policies of urban areas, and the growth of rural residential uses around existing communities is not so expansive that substantial conflicts or impediment of the implementation of existing land use plans and policies would result. Therefore, in 2020 and 2035 the 2050 RTP/SCS would not substantially conflict or impede the implementation of existing land use plans and policies, including general plans and specific plans. This impact is less than significant. The 2050 RTP/SCS’s impacts associated with conflicting or impeding the implementation of existing land use plans and policies, in combination with similar impacts that would result from related infrastructure projects such as the California High Speed Rail Train System (HST) and prospective future expansion or improvement of existing airport facilities or new airport development in the region as well as from impact projections from adopted plans including the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050
RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

J. NOISE (EIR SECTION 4.12)

N-5 Expose people residing or working in the project area to excessive noise levels for a project located within an airport land use plan or where such a plan has not been adopted within two miles of a public airport or public use airport (2020, 2035, 2050)

The SANDAG Board of Directors finds that in 2020, 2035 and 2050, development projects implementing the 2050 RP/SCS growth/land use changes could occur near public use or military airports; however, existing regulations, procedures, ALUCPs, and AICUZ studies would ensure compatibility between uses and reduce the potential for aircraft noise impacts. The proposed transportation network improvements would not involve changes in operations at public use or military airports and would not develop noise-sensitive land uses or employment centers; thus, proposed transportation projects would not expose future noise-sensitive land uses to excessive noise levels due to airport noise. Therefore, the 2050 RTP/SCS would not expose residents or employees to excessive airport noise levels, and this impact is less than significant. The 2050 RTP/SCS's impacts associated with exposing people in the project area to excessive noise levels for projects located within airport land use plans or near airports, in combination with similar impacts that would result from related infrastructure projects such as the California High Speed Rail Train System (HST) and improvements to freight rail lines, airports, and Ports of Entry/Border Crossings as well as from impact projections from adopted plans including the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

N-6 Expose people residing or working in the project area to excessive noise levels for a project within the vicinity of a private airstrip (2020, 2035, 2050)

The SANDAG Board of Directors finds that increased land use development and construction of transportation network improvements by 2020, 2035 and 2050 would occur near private airstrips or helipads. However, the 2050 RTC/SCS would not result in any operational changes (e.g., changes in flight patterns) to private airstrips in San Diego County. If a project would affect the operation of an airport, the project would be evaluated per local compatibility and FAA requirements. With adherence to FAA and Caltrans regulations, noise impacts associated with airports would be less than significant. The 2050 RTP/SCS's impacts associated with exposing people in the project area to excessive noise levels for projects located within the vicinity of a private airstrip, in combination with similar impacts that would result from related infrastructure projects such as the California High Speed Rail Train System (HST) and improvements to freight rail lines, airports, and Ports of Entry/Border Crossings as well as from impact projections from adopted plans including the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

K. POPULATION AND HOUSING (EIR SECTION 4.13)

PH-3 Impede implementation of the regional housing share allocation, including any local jurisdiction’s adopted housing element (2020, 2035, 2050)
The SANDAG Board of Directors finds that by 2020, 2035 and 2050, the 2050 RTP/SCS regional growth/land use changes and transportation network improvements would be consistent with the RHNA as required under SB 375. Impacts associated with implementation of the RHNA would be less than significant. The 2050 RTP/SCS’s impacts associated with impeding implementation of the regional housing share allocation, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train System (HST) and from impact projections from adopted plans including the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

L. PUBLIC SERVICES, UTILITIES AND ENERGY (EIR SECTION 4.14)

PS-1 (Impact associated with transportation network improvements) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services (2020, 2035, 2050)

The SANDAG Board of Directors finds that in 2020, 2035 and 2050, transportation network improvements would be developed within the service areas of local jurisdictions, and would require only a small increase in fire and police protection services compared to existing conditions. Schools and libraries would not be needed to support the transportation facilities themselves. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with the construction of governmental facilities, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and from impact projections from adopted plans including the SCAG 2008 RTP, adopted general plans throughout Southern California and long-term plans adopted by individual service providers operating in Southern California and Northern Baja, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

US-1 (Impact associated with transportation network improvements) Require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities to adequately meet projected capacity needs, the construction of which could cause a significant environmental effect (2020, 2035, 2050)

The SANDAG Board of Directors finds that in 2020, 2035 and 2050, transportation network improvements would require additional toilets, sinks, and drains and would generate nominal amounts of additional wastewater. In some cases, only new laterals or sewer lines would need to be constructed to convey wastewater to the collection system for treatment. However, transportation network improvements included in the proposed 2050 RTP/SCS would not result in a substantial increase in the amount of wastewater generated such that new or expanded wastewater treatment facilities would be needed. Therefore this impact is less than significant. The 2050 RTP/SCS’s impacts associated with the construction of new wastewater treatment facilities or the expansion of existing facilities, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure,
and freight rail infrastructure, and from impact projections from adopted plans including the SCAG 2008 RTP, adopted general plans throughout Southern California and long-term plans adopted by individual service providers operating in Southern California and Northern Baja, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**US-3 (Impact associated with transportation network improvements) Be served by landfills with insufficient permitted capacity to accommodate the project's solid waste disposal needs (2020, 2035, 2050)**

The SANDAG Board of Directors finds that in 2020, 2035 and 2050, transportation network improvements would generate waste from the demolition, grading, and excavation necessary for construction. Waste created from construction activities would be processed in C&D waste and inert debris facilities that process construction waste separately from municipal solid waste, and would not significantly reduce the available capacity at the region’s landfills. Therefore this impact is less than significant. The 2050 RTP/SCS’s impacts associated with landfills with insufficient permitted capacity, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and from impact projections from adopted plans including the SCAG 2008 RTP, adopted general plans throughout Southern California and long-term plans adopted by individual service providers operating in Southern California and Northern Baja, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**US-4 Cause noncompliance with federal, state, and local statutes and regulations related to solid waste (2020, 2035, 2050)**

The SANDAG Board of Directors finds that in 2020, 2035 and 2050, regional growth/land use changes and transportation network improvements would comply with federal, state, and local laws and regulations related to solid waste. Therefore this impact is less than significant. The 2050 RTP/SCS’s impacts associated with causing noncompliance with federal, state and local solid waste statutes and regulations, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train (HST), border/Port of Entry (POE) facility improvements, airport expansions in the San Diego region and Tijuana International Airport, port/maritime improvements, petroleum pipeline transportation infrastructure, and freight rail infrastructure, and from impact projections from adopted plans including the SCAG 2008 RTP, adopted general plans throughout Southern California and long-term plans adopted by individual service providers operating in Southern California and Northern Baja, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**M. RECREATION (EIR SECTION 4.15)**

**REC-1 (Impact associated with transportation network improvements) Result in substantial physical deterioration of existing parks or other recreational facilities (2020, 2035, 2050)**

The SANDAG Board of Directors finds that implementation of transportation network improvements would not result in substantial physical deterioration of existing parks or other recreational facilities since the use of parks or other recreational facilities is a result of regional
growth/land use changes rather than transportation improvements. Therefore, this impact is less than significant. The 2050 RTP/SCS’s impacts associated with causing physical deterioration of existing parks or other recreational facilities, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train and the California Coastal Trail, and from impact projections from adopted plans including the SCAG 2008 RTP, adopted land use plans for local jurisdictions in Southern California and Northern Baja, and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

REC-2 (Impact associated with transportation network improvements) Result in construction or expansion of recreation facilities (2020, 2035, 2050)

The SANDAG Board of Directors finds that implementation of the transportation network improvements would not directly result in the need for the expansion or construction of parkland and recreation facilities. Although transportation network improvements would convert parkland to transportation uses, project-specific review under Section 4(f) of the Department of Transportation Act of 1966 would minimize parkland conversion. Therefore this impact is less than significant. The 2050 RTP/SCS’s impacts resulting in construction or expansion of recreation facilities, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train and the California Coastal Trail, and from impact projections from adopted plans including the SCAG 2008 RTP, adopted land use plans for local jurisdictions in Southern California and Northern Baja, and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

N. TRANSPORTATION AND TRAFFIC (EIR SECTION 4.16)

T-1 Substantially increase average work trip travel time (in minutes) (2020, 2035, 2050)

The SANDAG Board of Directors finds that implementation of both regional growth/land use changes and transportation improvements results in an average work trip travel time increase less than one minute in 2020 over 2010 conditions, from 25.6 minutes to 26.0 minutes. A 3-minute increase in commute time is considered to constitute a significant increase. Thus, implementation of the 2050 RTP/SCS would not substantially increase the average commute time in excess of the 3-minute threshold and would result in a less than significant impact related to work trip travel time in 2020.

Implementation of both the land use changes and transportation improvements results in an increase in the average work trip travel time of less than 2 minute in 2035 over 2010 conditions, from approximately 25.6 minutes to 27.3 minutes. A less than 2 minute increase in commute time is not considered to constitute a significant increase. Thus, a less than significant impact related to work trip travel time would occur in 2035.

Similar to 2035, implementation of both the land use changes and transportation improvements results in an increase in the average work trip travel time of 2 minutes in 2050 over 2010 conditions, from approximately 25.6 minutes to 27.6 minutes. A 2-minute increase in commute time is not considered to constitute a significant increase. Thus, a less than significant impact related to work trip travel time would occur in 2050.
The 2050 RTP/SCS’s impacts resulting in a change in work trip travel time, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train, the prospective future expansion or improvement of existing airport facilities or new airport development in the region, and implementation of local arterial network improvements by local jurisdiction, along with impact projections from the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**T-2 Substantially decrease the percentage of work and higher education trips accessible within 30 minutes in peak periods (2020, 2035, 2050)**

The EIR forecasted the percentage change of work and higher education trips accessible within 30 minutes in peak periods for all transportation modes for years 2020, 2035, and 2050 and compared this to baseline 2010 conditions. A decrease of 3 percent or greater was considered a substantial decrease in the percent of those trips, i.e., a significant impact.

The SANDAG Board of Directors finds that in 2020, implementation of both regional growth/land use changes and transportation improvements results in an overall net increase of 4 percent of work or higher education trips accessible within 30 minutes for all transportation modes (i.e., driving alone, carpooling, transit), which is below the threshold of significance.

The SANDAG Board of Directors finds that in 2035, implementation of both the land use changes and transportation improvements results in an overall net decrease of 1 percent of peak period work and higher education trips accessible within 30 minutes for all transportation modes (i.e., driving alone, carpooling, transit), which is below the threshold of significance.

The SANDAG Board of Directors finds that in 2050, implementation of both the land use changes and transportation improvements results in an overall net decrease of 2 percent of peak period work and higher education trips accessible within 30 minutes for all transportation modes (i.e., driving alone, carpooling, transit), which is below the threshold of significance.

The 2050 RTP/SCS’s impacts resulting in a change in the percentage of work and higher education trips accessible within 30 minutes in peak periods, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train, the prospective future expansion or improvement of existing airport facilities or new airport development in the region, and implementation of local arterial network improvements by local jurisdiction, along with impact projections from the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**T-3 Substantially decrease the percentage of non-work-related trips accessible within 15 minutes (2020, 2035)**

The EIR forecasted the percentage change of non-work related trips accessible within 15 minutes for all transportation modes for years 2020, 2035, and 2050 and compared this to baseline 2010 conditions. A decrease of 3 percent or greater was considered a substantial decrease in the percent of those trips, i.e., a significant impact.

The SANDAG Board of Directors finds that in 2020, implementation of both regional growth/land use changes and transportation improvements results in an overall net increase of 1 percent of
non-work-related trips accessible within 15 minutes for all transportation modes (i.e., driving alone, carpooling, transit), as compared to 2010, which is below the threshold of significance.

The SANDAG Board of Directors finds that in 2035, implementation of both the land use changes and transportation improvements results in an overall net decrease of 2 percent of non-work-related trips accessible within 15 minutes for all transportation modes (i.e., driving alone, carpooling, transit) as compared to 2010, which is below the threshold of significance.

The 2050 RTP/SCS’s impacts resulting in a change in the percentage of non-work-related trips accessible within 15 minutes, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train, the prospective future expansion or improvement of existing airport facilities or new airport development in the region, and implementation of local arterial network improvements by local jurisdiction, along with impact projections from the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**T-4 Substantially increase the congested vehicle miles travelled (LOS E and F) in peak periods (2020, 2035)**

The SANDAG Board of Directors finds that in 2020, implementation of both regional growth/land use changes and transportation improvements results in a 1.5 percent decrease in the number of VMT in congested conditions as compared to 2010. This means that less VMT would occur in congested conditions. Thus, a less than significant impact related to total VMT in congested conditions during peak periods would result in 2020.

In 2035, implementation of both the land use changes and transportation improvements results in an increase in the percentage of VMT in congested conditions of 2.8 percent as compared to 2010. An increase of 3 percent or greater in those trips is considered substantial. Thus, a less than significant impact related to total VMT in congested conditions during peak periods would result in 2035.

The 2050 RTP/SCS’s impacts resulting in a change in congested vehicle miles travelled, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train, the prospective future expansion or improvement of existing airport facilities or new airport development in the region, and implementation of local arterial network improvements by local jurisdiction, along with impact projections from the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**T-5 Impede times for emergency access and response (2020, 2035, 2050)**

The SANDAG Board of Directors finds that the roadway congestion that would result from regional growth/land use changes or transportation network improvements in 2020, 2035 and 2050 would not impede response times for emergency response and access, and would result in a less than significant impact. The 2050 RTP/SCS’s impacts associated with impeding times for emergency access and response, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train, the prospective future expansion or improvement of existing airport facilities or new airport development in the region, and implementation of local arterial network improvements by local jurisdiction, along with impact
projections from the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

O. WATER SUPPLY (EIR SECTION 4.17)

**WS-1 (Impact associated with transportation network improvements) Increase the use of existing available water supplies or water treatment and other facilities such that water supplies or facilities would be inadequate to serve existing and projected future demand (2020, 2035)**

The SANDAG Board of Directors finds that existing and planned water supplies in 2020 and 2035 would be adequate to serve forecasted 2020 RTP transportation projects because the demands of these projects are relatively low compared to the forecasted water supply. For the same reason, new treatment facilities would not be required to provide water for irrigated landscaping for transportation network improvements by 2020 and 2035. New distribution pipelines may be needed to extend recycled water service to new projects where such service is not available. Such facilities, if needed, are a part of Caltrans engineering plans for the planned highway or freeway improvements. They are not generally considered as separate projects, and their impacts are not assessed independently, because they are always in the right-of-way and in the area that would be disturbed by construction of other elements of the project. Therefore, implementation of the 2050 RTP/SCS transportation network improvements would result in less than significant impacts related to the adequacy of water supplies. The 2050 RTP/SCS’s impacts associated with existing available water supplies and water treatment facilities, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train, the prospective future expansion or improvement of existing airport facilities or new airport development in the region, and implementation of local arterial network improvements by local jurisdiction, along with impact projections from the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore, the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

**WS-2 (Impact associated with transportation network improvements) Construction of new water treatment or distribution facilities or the expansion of existing facilities (2020, 2035)**

The SANDAG Board of Directors finds that construction of water treatment facilities would not be required to provide water for irrigated landscaping on proposed 2020 and 2035 RTP transportation projects, because the water demands of these projects are relatively minor. New distribution pipelines may be needed to extend recycled water service to new projects where such service is not available. Such facilities, if needed, are a part of Caltrans engineering plans for the proposed highway or freeway improvements. They would not independently cause significant impacts because they are located in the right-of-way that would be disturbed by construction of other elements of the transportation project. Therefore, implementation of the 2050 RTP/SCS transportation network improvements would result in less than significant impacts related to construction of new water treatment and distribution facilities in 2020 and 2035. The 2050 RTP/SCS’s impacts associated with construction of water treatment and distribution facilities, in combination with similar impacts that would result from related infrastructure projects including the California High Speed Rail Train, the prospective future expansion or improvement of existing airport facilities or new airport development in the region, and implementation of local arterial network improvements by local jurisdiction, along with impact projections from the SCAG 2008 RTP and the California-Baja California Border Master Plan, would not be significant. Therefore,
the 2050 RTP/SCS does not represent a cumulatively considerable contribution to a significant cumulative impact.

IV. FINDINGS REGARDING SIGNIFICANT ENVIRONMENTAL IMPACTS MITIGATED TO A LEVEL LESS THAN SIGNIFICANT

The SANDAG Board of Directors hereby finds that mitigation measures have been identified in the EIR that will avoid or substantially lessen the following environmental impacts to a less than significant level. These findings are based on the discussion of impacts in the detailed issue area analyses in Section 4.0 of the EIR and the cumulative impacts discussed in Section 5.0 of the EIR, as well as relevant responses to comments in the Final EIR. The significant impacts and the mitigation measures that will reduce them to a less than significant level are as follows.

A. BIOLOGICAL RESOURCES

BIO-4 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, state, or federal regulations, policies, ordinances, or plans (2020, 2035, 2050) (EIR Section 4.4)

Significant Impacts

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements that would conflict with the requirements of approved HCP/NCCPs or other local, regional, state, or federal regulations, policies, ordinances, or plans targeting the protection of biological resources.

Mitigation (EIR Section 4.4.5)

Implementation of Mitigation Measures BIO-Q and BIO-R would reduce these impacts to less than significant levels.

BIO-Q During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should modify designs to ensure the maximum feasible level of consistency with the policies in adopted HCPs, NCCPs, or other approved local, regional, or state conservation plans. If no feasible alternative exists that is consistent with conservation plans, the project proponent shall coordinate with USFWS, CDFG, and the appropriate local agency to provide full compensation of acreage and preserve function, retaining or improving upon the size, configuration, and habitat value of the preserve. Projects shall follow adopted procedures to process an amendment to the conservation plan(s) if necessary. In addition, all habitat-based mitigation required by the conservation plans shall be provided at ratios or quantities specified in the plans.

BIO-R During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should minimize impacts to MSCP and MHCP covered species through implementation of Mitigation Measures BIO-F through BIO-L. Avoidance, minimization, and mitigation measures for covered species, consistent with adopted HCP and/or NCCPs, shall be implemented as specified during project-specific review. Avoidance and
minimization measures to covered species and their habitats shall include adherence to land use adjacency guidelines as outlined in adopted HCP and/or NCCPs.

Projects implementing the 2050 RTP/SCS in 2020, 2035, and 2050 would be required to comply with all applicable local, regional, state, or federal regulations, policies, ordinances, and HCP/NCCPs described in Section 4.4.2, though it is possible for projects to process amendments to adopted plans or obtain variances from local codes in some situations (which would not reduce significant impacts due to conflicts). Mitigation Measures BIO-Q through BIO-R would reduce impacts to a level less than significant through requiring biologically equivalent or superior compensation when such situations arise.

Findings and Rationale

For this significant impact to biological resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures BIO-Q and BIO-R have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure BIO-Q will reduce the impact by requiring SANDAG and other implementing agencies to modify designs to ensure the maximum feasible level of consistency with the policies in adopted HCPs, NCCPs, or other approved local, regional, or state conservation plans, and, if no consistent alternative exists, to coordinate with USFWS and CDFG and the appropriate local agency to provide full compensation of acreage and preserve function. Mitigation measure BIO-R will reduce the impact by requiring SANDAG and other implementing agencies to implement Mitigation Measures BIO-F through BIO-L, which require surveys for status species, various methods of avoiding impacts to special status species through project design. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures BIO-Q and BIO-R are applied within their jurisdictions.

Cumulative Biological Resources Impacts (EIR Section 5.2.4) – BIO-4

The 2050 RTP/SCS’s conflicts with the requirements of approved HCP/NCCPs or other local, regional, state, or federal regulations, policies, ordinances, or plans targeting the protection of biological resources throughout the southern California region and northern Baja region by 2020, 2035 and 2050 (Impact BIO-4), in combination with similar impacts that would result from continued growth and development through the rest of the southern California and northern Baja region, would be significant. The 2050 RTP/SCS incremental contribution to this significant impact is cumulatively considerable.

Mitigation

Implementation of Mitigation Measures BIO-Q and BIO-R would reduce the 2050 RTP/SCS’s incremental contribution to this significant cumulative impact to less than significant levels.
Findings and Rationale

For these significant cumulative impacts associated with BIO-4, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures BIO-Q and BIO-R have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures BIO-Q and BIO-R are applied within their jurisdictions.

The SANDAG Board of Directors finds that the contribution of the 2050 RTP/SCS to a cumulative impact is less than cumulatively considerable and therefore less than significant because the SCS land use pattern incorporates finalized habitat plans as well as the conservation of other sensitive resource lands such as steep slopes, wetlands, and floodplains as reflected in plans by local jurisdictions. Implementation of mitigation measures BIO-Q and BIO-R would reduce direct and indirect impacts of the 2050 RTP/SCS to a less than significant level. Post mitigation, the 2050 RTP/SCS would not conflict with any other HCP, NCCP, or other approved local, regional, state, or federal regulations, policies, ordinances, or plans, including any plans in southern California or northern Baja California. However, conservation regulations in northern Baja currently lack the comprehensiveness and level of enforceability necessary to assure that development and transportation projects will fully comply with the provisions of the plans. For this reason, cumulative impacts resulting from conflicts with adopted conservation plans and policies will occur within the region. However, the 2050 RTP/SCS incremental contributions to biological resource impacts resulting from conflicts with the provisions of an adopted HCP or NCCP in years 2020, 2035, and 2050 would be less than cumulatively considerable because mitigation measures BIO-Q and BIO-R will be applied within the 2050 RTP/SCS.

B. CULTURAL RESOURCES AND PALEONTOLOGY (EIR SECTION 4.5)

CULT-1 Cause a substantial adverse change in the significance of a cultural resource (2020, 2035, 2050)

Significant Impacts

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements that would cause a substantial adverse change in the significance of a cultural resource.

Mitigation (EIR Section 4.5.5)

Implementation of Mitigation Measures CULT-A, CULT-B, CULT-C, CULT-D, CULT-E and CULT-F would reduce these impacts to a less than significant level.

CULT-A During CEQA review of development projects and transportation network improvement projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should conduct a review of literature and historic maps and a records search to determine whether the project area has been
previously surveyed and whether cultural resources were identified. In the event that the records indicate that no previous survey has been conducted, the project implementing agency shall have a qualified cultural resource specialist conduct a survey of the project area. Specifically, the report shall explicitly state the results of the literature study and site survey. In addition, SANDAG shall and other implementing agencies can and should consult the Native American Heritage Commission and any and all area tribes that have filed a claim in the Sacred Lands Inventory to identify potential places of cultural and/or religious importance or sites that may contain other cultural resources. Resources that cannot be avoided will need to be evaluated, and if found significant, will require project-level mitigation.

CULT – B  Prior to construction of specific development projects and transportation network improvement projects implementing the 2050 RTP/SCS that would disturb a historic structure listed or eligible to be listed in the NRHP, the CRHR, or the San Diego County Local Register of Historical Resources, SANDAG shall and other implementing agencies can and should develop feasible project-level mitigation measures, identified in consultation with lead agencies and the State Historic Preservation Office as appropriate, to avoid or substantially reduce impacts to significant cultural resources. Feasible project-level mitigation measures include maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction of any impacted historic resource, which will be conducted in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

CULT-C  During the planning, design, and environmental review phases of individual development projects and transportation network improvement projects implementing the 2050 RTP/SCS SANDAG shall and other implementing agencies can and should incorporate design measures in engineering documents to provide avoidance or minimization of impacts to significant archaeological or cultural resources. Archaeological or cultural resource sites identified as significant shall be avoided or mitigated by completion of a data recovery program conducted in compliance with CEQA and agency guidelines.

Site avoidance and preservation can include capping the site with gravel or construction fabric and 16 to 18 inches of sterile fill soil. Sites proposed for capping shall be indexed so future researchers have reasonable knowledge of the resources that have been protected. Capped sites can be landscaped with native, shallow rooted plants that are compatible with the surrounding biologic habitat. Suggested capping methods should be communicated to Interested Tribes for their review and Tribal recommendations shall be considered to the maximum extent feasible as capping plans are finalized. Passive uses for capped sites include trails, picnic areas, and play areas. Capped areas should not contain asphalt or landscaping with invasive root systems.

CULT –D  During construction of specific development projects and transportation network improvement projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should require areas determined to be of cultural significance to be monitored during the grading phase of individual projects by a qualified archeologist and Tribal monitor.
SANDAG shall and other implementing agencies can and should retain a Tribal monitor (at historic rates of compensation) or tribal representatives designated by the Tribal Council or chairperson, if so requested, to accompany a qualified archeologist to identify, and determine the significance of, cultural resources and/or sacred lands. Both the archeologist and tribal monitor shall observe ground-disturbing activities and/or other scientific surveying that may occur in preparation for construction activities.

Should an archaeological deposit and/or feature be encountered during construction activities, an Archaeological Data Recovery Program (ADRP) shall be prepared and implemented with consultation with Interested Tribes. Both the archeologist and tribal monitor should strive for agreement on the determined significance of an artifact or cultural resource. Once in agreement, either the archeologist or tribal monitor may divert or halt ground-disturbing activities for the purposes of implementing a data recovery program.

A data recovery program for archaeological sites consists of excavation of a percentage of the site (determined in consultation with the lead agency) to provide information necessary to answer significant research questions. Project implementation agencies shall integrate curation of all archaeological and/or historical artifacts and associated records in a regional center focused on the care, management, and use of archaeological collections. All Native American human remains and associated grave goods discovered shall be returned to their Most Likely Descendent and repatriated. The final disposition of artifacts not directly associated with Native American graves will be negotiated during consultation with Interested Tribes. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. Curated materials shall be maintained with respect for cultures and available to future generations for research.

CULT-E

Prior to construction of individual development projects and transportation network improvement projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should consult with the NAHC and local tribes for each discretionary project at the onset and during the environmental review process and the preconstruction phases to determine if ethnographic resources and/or sacred lands are present within the project area, or its vicinity. Native American tribes shall be notified of project construction prior to obtaining grading permits and/or beginning ground-disturbing activities within a tribe’s traditional territory. SANDAG shall and other implementing agencies can and should request from Interested Tribes appropriate provisions to address the proper treatment of found cultural resources and Native American remains and consider including these provisions in applicable work plans to the maximum extent feasible.

If cultural resources and/or sacred lands are present, SANDAG shall and other implementing agencies can and should communicate with Interested Tribes during the design, construction, operation, and decommissioning of the project. Prior to implementation of construction, SANDAG shall and other implementing agencies can and should communicate with Interested Tribes that place cultural significance on the project area. Outreach efforts between the Tribes and SANDAG or other implementing agencies shall be communicated quarterly during the design and construction phase for review and input. Where potential impacts are identified,
grading and excavation activities shall avoid impacts to identified resources, as feasible.

**CULT-F**

If human or nonhuman remains are found, SANDAG shall and other implementing agencies can and should immediately suspend construction in the vicinity of the discovery and determine if the remains discovered are human or nonhuman. For human remains, the archeologist and Tribal monitor, if present, shall protect discovered remains and/or burial goods remaining in the ground from additional disturbances. In the event that the human remains are discovered to be Native American, project implementation agencies shall contact the NAHC so that a Most Likely Descendent can be identified as required under California Public Resources Code §5097.98. Through coordination with SANDAG (or other implementing agencies), the Most Likely Descendent will determine the ultimate disposition of the human remains in compliance with all applicable local, state, and federal laws. Whenever possible, areas in which Native American remains and/or burial goods are discovered shall be avoided and placed into protected open space.

**Findings and Rationale**

For this significant impact to cultural resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures CULT-A through CULT-F have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure CULT-A will reduce the impact by requiring SANDAG and other implementing agencies to conduct a review of literature and historic maps and a records search to determine whether the project area has been previously surveyed and whether cultural resources were identified. Where resources are identified, a report shall explicitly state whether the resource is eligible for either state or local historical registers. Mitigation measure CULT-B will reduce the impact by requiring SANDAG and other implementing agencies to apply feasible project-level mitigation measures including maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction of any impacted historic resource, which must be accomplished in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Mitigation measure CULT-C will reduce the impact by requiring SANDAG and other implementing agencies to avoid archaeological sites identified as significant or mitigate impacts by completion of a data recovery program conducted in compliance with CEQA and agency guidelines. Mitigation measure CULT-D will reduce the impact by requiring SANDAG and other implementing agencies to require areas determined to be of cultural significance to be monitored during the grading phase of individual projects. If an archaeological deposit and/or feature be encountered during grading or construction activities, an Archaeological Data Recovery Program (ADRP) must then be implemented. Mitigation measure CULT-E will reduce the impact by requiring SANDAG and other implementing agencies to consult with the NAHC and local tribes for each discretionary project at the onset environmental review process to determine if ethnographic resources and/or sacred lands are present within the project area, or its vicinity. Where potential impacts are identified, grading and excavation activities must avoid impacts to identified resources, as feasible. Mitigation measure CULT-F will suspend construction if human or nonhuman remains are found and guides further action following discovery. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those change and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather
than SANDAG, these local agencies are responsible for ensuring mitigation measures CULT-A through CULT-F are applied within their jurisdictions.

**PALEO-1 Directly or indirectly destroy a unique paleontological resource or site or unique geological feature (2020, 2035, 2050)**

**Significant Impacts**

By 2020, 2035 and 2050, ground-disturbing activities, such as construction associated with development, redevelopment, and/or expansion of infrastructure associated with the implementation of the 2050 RTP/SCS have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geological feature. Existing federal, state, and local laws, regulations, and programs included in Section 4.5.2 would help reduce impacts to paleontological resources and unique geological resources, but there is no assurance that they would reduce these impacts to a less than significant level.

**Mitigation (EIR Section 4.5.5)**

Implementation of Mitigation Measures PALEO-A would reduce impacts to a less than significant level.

**PALEO-A** If it is determined during the environmental review process that development projects and transportation network improvement projects implementing the 2050 RTP/SCS would be located within an area of high or moderate paleontological resource sensitivity or near a known unique geological feature, and would remove at least 2,500 cubic yards of soil from a previously unearthed area, SANDAG shall and other implementing agencies can and should require a qualified researcher to be stationed on-site to observe during grading operations and recover scientifically valuable specimens or enforce avoidance of the unique geologic feature. A certified paleontologist or qualified researcher shall be retained (or required to be retained) by the project-implementing agency prior to construction to establish procedures for surveillance and the preconstruction salvage of exposed resources if fossil-bearing rocks or unique geologic features have the potential to be impacted. The monitor shall provide preconstruction coordination with contractors, oversee original cutting in previously undisturbed areas of sensitive geologic formations, halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, and oversee fossil salvage operations and reporting. This measure shall be placed as a condition on all grading plans where grading is proposed in geologic units defined as having a moderate or high potential for containing fossils.

**Findings and Rationale**

For this significant impact to paleontological resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure PALEO-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure PALEO-A will reduce the impact by requiring SANDAG and other implementing agencies to require a qualified researcher to be stationed on-site to observe during grading operations within an area of high or moderate paleontological resource sensitivity or near a known unique geological feature and recover scientifically valuable specimens or enforce avoidance of the unique geologic feature. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of
SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure PALEO-A is applied within their jurisdictions.

C. ENVIRONMENTAL JUSTICE (EIR SECTION 4.6)

**EJ-2 Disproportionately high human health or environmental impacts (2020, 2035, 2050)**

**Significant Impacts**

Please note that an environmental justice section is not required by CEQA. Nevertheless, the EIR found that for the years 2020, 2035, and 2050, environmental effects are present that may accrue disproportionately to communities of concern.

**Mitigation (EIR Section 4.6.5)**

Implementation of Mitigation Measure EJ-A would reduce this impact to a less than significant level.

**EJ-A**

There is a potential for disproportionate impacts from the forecasted transportation network improvements and regional growth related to range of environmental impacts. These impacts would be highly localized, however, and analyses would be required at the project level to accurately ascertain any potential disproportionate impacts. Subsequent project-specific environmental review, including an environmental justice analysis, will be completed per CEQA and NEPA, as applicable, to further analyze the forecasted improvements to determine how environmental impacts may accrue to communities of concern. In the event that environmental justice impacts are determined to occur, SANDAG shall and other implementing agencies can and should develop mitigation measures that may include increased outreach to communities of concern, more culturally specific outreach strategies to target specific community of concern populations, the involvement of community leaders in project planning and/or design, or the establishment of working groups with community of concern members to help guide the development of the project and communicate project impacts to the community, among other mitigation measures developed at that time that may improve communication and involvement between the agency and community stakeholders.

**Findings and Rationale**

For this significant impact to environmental justice, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure EJ-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure EJ-A will reduce the impact by requiring SANDAG and other implementing agencies to include increased outreach to communities of concern, more culturally specific outreach strategies to target specific community of concern populations, the involvement of community leaders in project planning and/or design, or the establishment of working groups with community of concern members to help guide the development of specific projects and communicate project impacts to the community, among other mitigation measures developed at that time that may improve communication and involvement between the agency and community.
stakeholders. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure EJ-A is applied within their jurisdictions.

**Cumulative Environmental Justice (EIR Section 5.2.6) – EJ-2**

**Significant Impacts**

Please note that an environmental justice section is not required by CEQA. Nevertheless, the EIR determined that cumulative environmental justice impacts throughout southern California and northern Baja, in combination with a number of environmental and human health impacts of the 2050 RTP/SCS that would accrue disproportionately to communities of concern throughout southern California and northern Baja by 2020, 2035 and 2050 (Impact EJ-2), would be significant. The 2050 RTP/SCS makes a cumulatively considerable contribution to this significant cumulative impact.

**Mitigation (EIR Section 4.6.5)**

Implementation of mitigation measure EJ-A above would reduce the 2050 RTP/SCS' cumulatively considerable contribution to cumulative significant cumulative environmental justice impact EJ-2 to a less than significant level, as described in Section 4.6.5 of the EIR.

**Findings and Rationale**

The SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure EJ-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies with responsibility and jurisdiction. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure EJ-A is applied within their jurisdictions.

For purposes of analysis of potential impacts to environmental justice, demographic information is used to determine whether communities of concern are present in the areas potentially affected by the 2050 RTP/SCS. While there is potential for disproportionate impacts to communities of concern from forecasted land use changes and transportation network improvements, these impacts would be highly localized, and limited to the geographic area in which the impact occurs. These impacts will be further limited in their degree or increment of impact by mitigation measure EJ-A. The localized nature of the environmental justice impacts in the San Diego region, in concert with implementation of mitigation measure EJ-A at the individual project level, precludes the combination of these localized impacts with impacts occurring elsewhere in southern California and northern Baja California, thus preventing a compounding effect or cumulative impact. Additionally, mitigation measure EJ-A would reduce environmental justice impacts from the 2050
RTP/SCS to below the level of significance, and associated infrastructure projects not included in the 2050 RTP/SCS should implement a similar mitigation measure. Therefore, the 2050 RTP/SCS incremental contributions to significant cumulative environmental justice impacts in the years 2020, 2035, and 2050 would not be cumulatively considerable post-mitigation.

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

GEO-3 Result in substantial soil erosion or the loss of topsoil (2020, 2035, 2050)

**Significant Impacts**

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements, both of which would cause soil erosion or the loss of topsoil.

**Mitigation (EIR Section 4.7.5)**

Implementation of Mitigation Measure GEO-A would reduce impacts to a less than significant level.

**GEO-A**

During project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should develop detailed erosion control mitigation measures tailored to the project and site to be developed and included in the SWPPP upon application for a Construction General Permit. During construction, implementing agencies can and should avoid construction on unstable slopes and erosion-prone areas where possible, use special construction techniques to minimize erosion, and manage on-site grading to maximize the capture and retention of on-site runoff by creating perimeter ditches, trenches, siltation ponds, or similar depressions. Low-impact development (LID) design features, including drought-tolerant landscaping, shall be incorporated into each drainage design to the maximum extent practicable. Where permanent, postconstruction BMPs are specified (e.g., detention/retention systems), features shall be utilized for temporary sediment trap devices during construction. In addition, agencies can and should develop an erosion control and revegetation plan for the project site to delineate measures to minimize soil loss and prevent short-term and long-term significant soil erosion problems. Routine site inspections should be made to assess long-term effectiveness of soil erosion control.

**Findings and Rationale**

For this significant impact to geology and soils, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure GEO-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure GEO-A will reduce the impact by requiring SANDAG and other implementing agencies to develop detailed erosion control mitigation measures tailored to the project and site to be developed and included in the SWPPP upon application for a Construction General Permit, and develop an erosion control and revegetation plan for the project site to delineate measures to minimize soil loss and prevent short-term and long-term significant soil erosion problems. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes
and alterations can and should be adopted by those other agencies. For example, since certain
growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies,
such as cities in the San Diego region and the County of San Diego rather than SANDAG, these
local agencies are responsible for ensuring mitigation measure GEO-A is applied within their
jurisdictions.

**Cumulative Geology, Soils and Mineral Resources (EIR Section 5.2.7) – GEO-3**

**Significant Impacts**

Impacts of the 2050 RTP/SCS related to soil erosion or loss of topsoil throughout southern
California and northern Baja by 2020, 2035 and 2050 (Impact GEO-3), combined with impacts
from transportation facilities and other infrastructure projects located within the same watershed,
would be significant. The 2050 RTP/SCS makes a cumulatively considerable contribution to this
significant cumulative impact.

**Mitigation (EIR Section 4.7.5)**

Implementation of mitigation measure GEO-A above would reduce the 2050 RTP/SCS’
contribution to a cumulative impact to a less than significant level.

**Findings and Rationale**

For these significant cumulative impacts associated with GEO-3, the SANDAG Board of Directors
finds that changes or alterations as set forth in mitigation measure GEO-A have been required in,
or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact.
The SANDAG Board of Directors finds that some of the changes and alterations described in this
mitigation measure are within the responsibility of SANDAG, while others are within the
responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes
and alterations can and should be adopted by those other agencies. For example, since certain
growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies,
such as cities in the San Diego region and the County of San Diego rather than SANDAG, these
local agencies are responsible for ensuring mitigation measure GEO-A is applied within their
jurisdictions.

The SANDAG Board of Directors finds that the contribution of the 2050 RTP/SCS to a cumulative
impact is less than significant because mitigation measure GEO-A would reduce impacts to soil
erosion and loss of topsoil due to construction of transportation and infrastructure projects as
identified in Section 4.7.5 such that the project’s incremental contribution would no longer be
cumulatively considerable. Mitigation Measure GEO-A states that SANDAG shall and
implementing agencies should, during project-specific design and CEQA review, develop and
implement detailed erosion control mitigation measures tailored to the project and site to be
developed and included in the SWPPP upon application for a Construction General Permit. As
outlined in Section 4.7.6, Mitigation Measure GEO-A would reduce impacts from the 2050
RTP/SCS to soil erosion and loss of topsoil to a less-than-significant level. Furthermore, the
erosion control and revegetation plans listed in GEO-A would function to retain runoff and
sediment on-site during construction by avoiding unstable slopes and erosion-prone areas where
possible, using special construction techniques to minimize erosion, and manage on-site grading
to maximize the capture and retention of on-site runoff by creating perimeter ditches, trenches,
siltation ponds, or similar depressions. The plans would also employ low-impact development
(LID) design features, including drought-tolerant landscaping, and where permanent, post-
construction BMPs are specified (e.g., detention/retention systems), features will be utilized for temporary sediment trap devices during construction. These plans thus incorporate proven techniques to minimize any cumulative contributions to larger watershed soil erosion and sedimentation problems. Therefore, the 2050 RTP/SCS incremental contributions to cumulative impacts for soil erosion and loss of topsoil in years 2020, 2035, and 2050 would not remain cumulatively considerable post-mitigation. If other infrastructure and development projects not included in the 2050 RTP/SCS implement a similar mitigation measure, watershed impacts would be further reduced. Thus, the 2050 RTP/SCS incremental contributions to cumulative impacts for soil erosion and loss of topsoil in years 2020, 2035, and 2050 would not remain cumulatively considerable post-mitigation.

E. HYDROLOGY AND WATER QUALITY (EIR SECTION 4.10)

WQ-2 Substantially alter the existing drainage pattern of the site or area (2020, 2035, 2050)

Significant Impacts

By 2020, 2035 and 2050, the forecasted land use changes and transportation network improvements associated with the implementation of the 2050 RTP/SCS have the potential to substantially alter drainage patterns in a manner that would cause significant water quality impacts. Adherence to existing regulatory requirements described above and in Section 4.10.2 would help reduce these impacts, but there is no assurance that they would reduce these impacts to a less than significant level.

Mitigation (EIR Section 4.10.5)

Implementation of Mitigation Measure WQ-A would reduce impacts to a level that is less than significant.

WQ-A During project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should develop detailed erosion control mitigation measures tailored to the project and site to be developed and included in the SWPPP upon application for a Construction General Permit. During construction, implementing agencies can and should avoid construction on unstable slopes and erosion-prone areas where possible; use special construction techniques to minimize erosion; and manage on-site grading to maximize the capture and retention of on-site runoff by creating perimeter ditches, trenches, siltation ponds, or similar depressions. Low-impact development (LID) guidance provided by the Governor's Office of Planning and Research (http://www.opr.ca.gov/ceqa/pdfs/Technical_Advisory_LID.pdf) as well as other implementing agencies such as the County’s LID Handbook shall be used to select LID design features. These features including drought-tolerant landscaping, shall be incorporated into each drainage design to the maximum extent practicable. Where permanent, postconstruction BMPs are specified (e.g., detention/retention systems), features shall be utilized for temporary sediment trap devices during construction. In addition, agencies can and should develop an erosion control and revegetation plan for the project site to delineate measures to minimize soil loss and prevent short-term and long-term significant soil erosion problems. Routine site inspections should be made to assess long-term effectiveness of soil erosion control.
Finding

For this significant impact to water quality, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure WQ-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure WQ-A will reduce the impact by requiring SANDAG and other implementing agencies to develop detailed erosion control mitigation measures tailored to the project and site to be developed and included in the SWPPP upon application for a Construction General Permit. During construction, implementing agencies can and should avoid construction on unstable slopes and erosion-prone areas where possible; use special construction techniques to minimize erosion; and manage on-site grading to maximize the capture and retention of on-site runoff by creating perimeter ditches, trenches, siltation ponds, or similar depressions. Low-impact development (LID) design features, including drought-tolerant landscaping, shall be incorporated into each drainage design to the maximum extent practicable. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure WQ-A is applied within their jurisdictions.

Cumulative Hydrology and Water Quality (EIR Section 5.2.10) – WQ-2

Significant Impacts

Although compliance with existing regulation would reduce the 2050 RTP/SCS’ impacts to drainage patterns (WQ-2), site specific conditions would determine the severity of the impacts and regulations will not guarantee that impacts would be less than significant. Since the Water Quality Control Plans for the five basins within the greater region that were relied upon for the cumulative analysis (San Diego Basin (Region 9), Colorado River Basin (Region 9), Santa Ana Basin (Region 9), Los Angeles Basin (Region 9), and the Lahontan Basin (Region 9)) were written prior to the 2050 RTP/SCS, the proposed regional growth and transportation network improvements may not have been accounted for in the plans. Therefore, the EIR assumed that cumulative impacts to existing drainage patterns throughout southern California and northern Baja by 2020, 2035 and 2050 would be significant, and that the 2050 RTP/SCS’ contribution to this impact would be cumulatively considerable.

Mitigation (EIR Section 4.10.5)

Implementation of mitigation measure WQ-A above would reduce the 2050 RTP/SCS contribution to a cumulative impact to a less than significant level.

Findings and Rationale

For the significant cumulative impacts associated with impact WQ-2, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure WQ-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes...
and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure WQ-A is applied within their jurisdictions.

The SANDAG Board of Directors finds that the contribution of the 2050 RTP/SCS to a cumulative impact is less than significant because mitigation measure WQ-A would reduce impacts associated with alteration of existing drainage patterns due to construction of transportation and infrastructure projects as identified in Section 4.10.5 such that the project’s incremental contribution would no longer be cumulatively considerable. Mitigation measure WQ-A states that SANDAG shall, and implementing agencies can and should, during project-specific design and CEQA review, develop and implement detailed erosion control mitigation measures tailored to the project and site to be developed and included in the SWPPP upon application for a Construction General Permit and implement LID design features to the maximum extent practicable. As outlined in Section 4.10.6, mitigation measure WQ-A would reduce impacts from the 2050 RTP/SCS to drainage patterns to a less-than-significant level. Furthermore, SWPPPs and LID design features would function to retain runoff on-site during construction by avoiding unstable slopes and erosion-prone areas where possible, using special construction techniques to minimize erosion, and manage on-site grading to maximize the capture and retention of on-site runoff by creating perimeter ditches, trenches, siltation ponds, or similar depressions. The plans would also employ low-impact development (LID) design features, including drought-tolerant landscaping, and where permanent, postconstruction BMPs are specified (e.g., detention/retention systems), features will be utilized for temporary sediment trap devices during construction. These plans, thus incorporate proven techniques to minimize any cumulative contributions to larger watershed hydrology and water quality problems. Therefore, the 2050 RTP/SCS incremental contributions to cumulative impacts on drainage patterns in years 2020, 2035, and 2050 would not remain cumulatively considerable post-mitigation.

F. PUBLIC SERVICES, UTILITIES AND ENERGY (EIR SECTION 4.14)

PS-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services (2020, 2035, 2050)

Significant Impacts

In the year 2020, 2035 and 2050, regional growth, but not transportation network improvements, would result in substantial adverse physical impacts associated with the construction of new or physically altered governmental facilities.

Mitigation (EIR Section 4.14.5)

Implementation of Mitigation Measure PS-A reduces impacts from the construction of governmental facilities.
During the CEQA review process for individual facilities, San Diego region cities; the County of San Diego; and all school districts, colleges, and universities with responsibility for construction of new public service facilities or the expansion of existing facilities, including those of police and fire protection services, libraries, and schools, can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new public or expanded public service facilities.

**Findings and Rationale**

For this significant impact to public services, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure PS-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure PS-A will reduce the impact by requiring SANDAG and other implementing agencies to apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of police and fire protection services, libraries, and schools. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water facilities. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since construction of public services facilities is controlled by other public agencies, such as cities in the San Diego region, the County of San Diego, special districts, and educational institutions, rather than by SANDAG, these local agencies are responsible for ensuring mitigation measure PS-A is applied to their public facilities projects.

**US-A Require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities to adequately meet projected capacity needs, the construction of which could cause a significant environmental effect (2020, 2035, 2050)**

**Significant Impacts**

In the year 2020, 2035 and 2050, regional growth, but not transportation network improvements, would result in construction of new wastewater facilities or expansion of existing wastewater facilities, the construction of which could cause significant environmental effects.

**Mitigation (EIR Section 4.14.5)**


**US-A**

During the CEQA review process for individual facilities, San Diego region cities, the County of San Diego, and special districts with responsibility for the construction of new wastewater treatment and collection facilities or the expansion of existing facilities to
adequately meet projected capacity needs can and should apply necessary mitigation measures to reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality and others that apply to specific construction or expansion of wastewater treatment and collection facilities projects.

**US-B** During the CEQA review process for individual development projects, San Diego region cities, the County of San Diego and special districts with responsibility for project approval can and should apply necessary mitigation measures to conserve water and reduce the generation of wastewater. Such measures should be imposed through conditions required to be followed by those directly involved in the design, construction, and operation of projects.

**Findings and Rationale**

For this significant impact to public services, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures US-A and US-B have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure US-A will reduce the impact by requiring SANDAG and other implementing agencies to apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction of new wastewater treatment and collection facilities or the expansion of existing facilities to adequately meet projected capacity needs. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality and others that apply to specific construction or expansion of wastewater treatment and collection facilities projects. Mitigation measure US-B will apply necessary mitigation measures to conserve water and reduce the generation of wastewater. Such measures should be imposed through conditions required to be followed by those directly involved in the design, construction, and operation of projects.

The SANDAG Board of Directors finds that the changes and alterations described in these mitigation measures are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since construction of wastewater facility construction and water conservation are controlled by other public agencies, such as cities in the San Diego region, the County of San Diego, and special districts, rather than by SANDAG, these local agencies are responsible for ensuring mitigation measures US-A and US-B are applied to their projects.

**US-2 Require or result in the construction of new storm water drainage facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects (2020, 2035, 2050)**

**Significant Impacts**

In the year 2020, 2035 and 2050, both regional growth and transportation network improvements would result in construction of new storm water drainage facilities or expansion of existing storm water drainage facilities, the construction of which could cause significant environmental effects.
Mitigation (EIR Section 4.14.5)

Implementation of Mitigation Measure US-C would reduce impacts from the construction of storm water drainage facilities.

US-C During the CEQA review process for individual facilities, SANDAG shall and San Diego region cities, the County of San Diego, and other implementing agencies with responsibility for the construction of new storm water drainage facilities or the expansion of existing facilities to adequately meet projected capacity needs can and should apply necessary mitigation measures including actions set forth in regional watershed management plans, to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of storm water drainage facilities projects.

Finding

For this significant impact to public services, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure US-C have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure US-C will reduce this impact by requiring SANDAG and other implementing agencies with responsibility for the construction of new storm water drainage facilities or the expansion of existing facilities to adequately meet projected capacity needs to apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of storm water drainage facilities projects. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since construction of stormwater drainage facilities is controlled by San Diego region cities, the County of San Diego, and other implementing agencies, these local agencies are responsible for ensuring mitigation measure US-C is applied within their jurisdictions.

US-5 Require or result in the construction of new natural gas, electricity, or transportation fuel facilities or the expansion of existing facilities to adequately meet projected capacity needs, the construction of which could cause a significant environmental effect (2020, 2035, 2050)

Significant Impacts

In the year 2020, 2035 and 2050, both regional growth and transportation network improvements would result in construction of new natural gas, electricity, or transportation fuel facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
**Mitigation (EIR Section 4.14.5)**

Implementation of Mitigation Measures US-E and US-F would be required to reduce impacts from the construction of natural gas and electricity facilities.

**US-E** During the CEQA review process, San Diego region energy providers and energy regulatory agencies with responsibility for the construction or approval of new natural gas, electricity, and transportation fuel facilities or the expansion of existing facilities to adequately meet projected capacity needs can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of natural gas and electric facilities projects.

**US-F** During the CEQA review process for individual development projects, San Diego region cities, the County of San Diego and special districts with responsibility for project approval can and should apply necessary mitigation measures to reduce energy consumption and promote the use of renewable energy. Such measures should be imposed through conditions required to be followed by those directly involved in the design, construction, and operation of projects.

**Findings and Rationale**

For this significant impact to public services, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures US-E and US-F have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure US-E will reduce the impact by requiring San Diego region energy providers and energy regulatory agencies with responsibility for the construction or approval of new natural gas, electricity, and transportation fuel facilities or the expansion of existing facilities to adequately meet projected capacity needs by applying necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of natural gas and electric facilities projects. Mitigation measure US-F calls for San Diego region cities, the County of San Diego and special districts with responsibility for individual development project approval to apply necessary mitigation measures to reduce energy consumption and promote the use of renewable energy.

The SANDAG Board of Directors finds that the changes and alterations described in these mitigation measures are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since San Diego region energy providers and energy regulatory agencies control the construction of new energy facilities, and since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures US-E and US-F are applied within their jurisdictions.

Significant Impacts

Impacts of the 2050 RTP/SCS related to construction of government facilities (PS-1), wastewater treatment facilities (US-1), storm water drainage facilities (US-2), and energy facilities (US-5) throughout southern California and northern Baja by 2020, 2035 and 2050 would be significant absent mitigation. When these impacts are combined with associated infrastructure projects and adopted plans in the San Diego region, Southern California and Northern Baja, they result in a significant cumulative impact. The 2050 RTP/SCS makes a cumulatively considerable contribution to these significant impacts.

Mitigation (EIR Section 4.14.5)


Findings and Rationale

For these cumulative significant impacts associated with Impacts PS-1, US-1, US-2 and US-5, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure PS-A, US-A, US-B, US-C, US-E and US-F have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen these significant impacts. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure WQ-A is applied within their jurisdictions.

The SANDAG Board of Directors finds that the contribution of the 2050 RTP/SCS to cumulative impacts associated with Impacts PS-1, US-1, US-2 and US-5 is less than significant because mitigation measures PS-A, US-A, US-B, US-C, US-E and US-F would reduce impacts associated with construction of government facilities, wastewater treatment facilities, storm water drainage facilities, and energy facilities such that the project’s incremental contribution would no longer be cumulatively considerable. Implementation of mitigation measures PS-A, US-A, US-B, US-C, US-E and US-F, would reduce impacts associated with the construction of governmental facilities, wastewater treatment facilities, storm water drainage facilities, and energy facilities to a level less than significant through CEQA review of specific facilities, which would mitigate project-specific construction related impacts to less-than-significant levels. Furthermore, activities associated with construction of these facilities would result in short-term temporary impacts, thereby minimizing any cumulative contributions to larger construction-related impacts. In addition, because construction activities associated with projects in the 2050 RTP/SCS are not likely to occur at precisely the same time as construction activities of the same type associated with projects in the broader Southern California and Northern Baja regions, impacts generally will not overlap, thereby further minimizing the cumulative contributions of the project. Thus, the 2050 RTP/SCS’s incremental contributions to cumulative impacts from the construction of governmental facilities,
wastewater treatment facilities, storm water drainage facilities, or energy facilities in years 2020, 2035, and 2050 and impacts would not be cumulatively considerable post-mitigation.

G. RECREATION (EIR SECTION 4.15)

*REC-2 Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment (2020, 2035, 2050)*

**Significant Impacts**

By 2020, 2035 and 2050, the 2050 RTP/SCS growth/land use changes, but not transportation network improvements, would require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

**Mitigation (EIR Section 4.15.5)**

Implementation of Mitigation Measure REC-B would reduce impacts to a less-than-significant level.

**REC-B** During project-specific design and CEQA review, the 19 incorporated cities, the County of San Diego, and special districts with responsibility for the construction of new or expanded recreation facilities, including recreational trails, can and should apply mitigation measures to avoid or substantially reduce construction and operational impacts on air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and other resources.

**Findings**

For this significant impact to public services, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure REC-B have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure REC-B will reduce the impact by calling for the 19 incorporated cities, the County of San Diego, and special districts with responsibility for the construction of new or expanded recreation facilities to apply mitigation measures to avoid or substantially reduce construction and operational impacts on air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and other resources.

The SANDAG Board of Directors finds that the changes and alterations described in these mitigation measures are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since construction of recreational facilities is controlled by cities in the San Diego region, the County of San Diego, and special districts, these local agencies are responsible for ensuring mitigation measure REC-B is applied within their jurisdictions.

H. WATER SUPPLY (EIR SECTION 4.17)

*WS-2 (Impact associated with regional growth/land use change) Construction of new water treatment or distribution facilities or the expansion of existing facilities (2020, 2035, 2050)*;
(Impact associated with transportation network improvements) Construction of new water treatment or distribution facilities or the expansion of existing facilities (2050)

Significant Impacts

In the year 2020 and 2035, transportation network improvements would result in construction of expanded or new water treatment or distribution facilities, the construction of which could cause significant environmental effects. In 2050, regional growth/land use change and transportation network improvements would both result in construction of expanded or new water treatment or distribution facilities, the construction of which could cause significant environmental effects.

Mitigation (EIR Section 4.17.5)

Implementation of Mitigation Measure WS-C would reduce impacts to a less-than-significant level.

WS-C

During the CEQA review process for individual facilities, San Diego region cities, the County of San Diego, and special districts with responsibility for the construction of new water treatment and collection facilities or the expansion of existing facilities to adequately meet forecasted capacity needs can and should apply necessary mitigation measures to reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of water treatment and collection facilities projects.

Findings and Rationale

For this significant impact to public services, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure WS-C have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. Mitigation measure WS-C will reduce the impact by calling for the 19 incorporated cities, the County of San Diego, and special districts with responsibility for the construction of new water treatment and collection facilities or the expansion of existing facilities to adequately meet forecasted capacity needs by applying necessary mitigation measures to reduce significant environmental impacts associated with the construction or expansion of such facilities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of water treatment and collection facilities projects.

The SANDAG Board of Directors finds that the changes and alterations described in these mitigation measures are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since construction of water facilities is controlled by San Diego region cities, the County of San Diego, and special districts, these local agencies are responsible for ensuring mitigation measure WS-C is applied within their jurisdictions.
V. FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

The SANDAG Board of Directors hereby finds that mitigation measures that have been identified in the EIR that will lessen the following significant environmental impacts but not to a less than significant level. These findings are based on the discussion of impacts in the detailed issue area analyses in Section 4.0 of the EIR and the cumulative impacts discussed in Section 5.0 of the EIR as well as relevant responses to comments in the Final EIR. The impacts that will remain significant and unavoidable despite implementation of all feasible mitigation measures are as follows:

Aesthetics and Visual Resources; Agriculture and Forest Resources; Air Quality; Biological Resources; Geology, Soils, and Mineral Resources; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Land Use; Noise; Population and Housing; Public Services, Utilities and Energy; Recreation; Transportation and Traffic; and Water Supply.

A. AESTHETICS AND VISUAL RESOURCES (EIR SECTION 4.1)

VIS-1 Block panoramic views or views of significant landscape features or landforms (2020, 2035, 2050)

Significant Impacts

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in regional growth/land uses changes and the construction of transportation network improvements that would block panoramic views or views of significant landscape features or landforms.

Mitigation (EIR Section 4.1.5)

Implementation of Mitigation Measures VIS-A, VIS-B, VIS-C and VIS-D would reduce impacts, though not below a less than significant level.

VIS-A During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure that projects are designed to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. The projects should avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Projects should be sited or designed to minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.

VIS-B During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure that projects use natural landscaping to minimize contrasts between the project and surrounding areas. Wherever possible, the implementing agency should design transportation improvements, included highway expansions, extensions, and interchanges; transit lines; and arterial improvements at the grade of the surrounding land to limit view blockage to the extent feasible. Project designs
should contour the edges of major cut-and-fill slopes to provide a more natural-looking finished profile.

**VIS-C**

During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure landscaping design along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear travel experience that would otherwise occur.

**VIS-D**

During or immediately following construction of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should replace and renew landscaping to the greatest extent possible along corridors with road widenings, interchange projects, and related improvements. The implementing agency should plan landscaping in new corridors to respect existing natural and man-made features and to complement the dominant landscaping of surrounding areas.

**Findings and Rationale**

For the significant impact resulting from blocking panoramic views or views of significant landscape features or landforms, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures VIS-A through VIS-D have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures VIS-A through VIS-D are applied within their jurisdictions.

Although mitigation measures VIS-A through VIS-D reduce the significant impact resulting from blocking panoramic views or views of significant landscape features or landforms, the impact will remain significant and unavoidable because some of the projects and expected development are located in areas where blocking of views cannot be avoided, and while the mitigation measures may help reduce impacts or make the views more visually pleasing than they would be without mitigation, it cannot be guaranteed that all future project-level impacts can be mitigated to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**VIS-2 Substantially degrade the character of an area (2020, 2035, 2050)**

**Significant Impacts**

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in regional growth/land use changes and the construction of transportation network improvements that could
substantially degrade the character of an area, including adding a visual element of urban character to an existing rural or open space area.

**Mitigation (EIR Section 4.1.5)**

Implementation of Mitigation Measures VIS-A, VIS-B, VIS-C, VIS-D and VIS-E would reduce impacts, though not below a less than significant level.

**VIS-A**
During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure that projects are designed to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. The projects should avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Projects should be sited or designed to minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.

**VIS-B**
During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure that projects use natural landscaping to minimize contrasts between the project and surrounding areas. Wherever possible, the implementing agency should design transportation improvements, included highway expansions, extensions, and interchanges; transit lines; and arterial improvements at the grade of the surrounding land to limit view blockage to the extent feasible. Project designs should contour the edges of major cut-and-fill slopes to provide a more natural-looking finished profile.

**VIS-C**
During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure landscaping design along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear travel experience that would otherwise occur.

**VIS-D**
During or immediately following construction of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should replace and renew landscaping to the greatest extent possible along corridors with road widenings, interchange projects, and related improvements. The implementing agency should plan landscaping in new corridors to respect existing natural and man-made features and to complement the dominant landscaping of surrounding areas.

**VIS-E**
During construction of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other the implementing agencies can and should ensure sound walls, berms or alternative noise reduction mechanisms, such as creating buffer zones, planting vegetation, or alternative pavement types, are constructed of materials whose color and texture complement the surrounding landscape and
development. Design of the sound walls or alternative noise reduction mechanisms should use color, texture, landscaping, and alternating façades to “break up” large façades and provide visual interest.

Findings and Rationale

For the significant impact resulting from substantially degrading the character of an area, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures VIS-A through VIS-E have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures VIS-A through VIS-E are applied within their jurisdictions.

Although mitigation measures VIS-A through VIS-E reduce the significant impact resulting from substantially degrading the character of an area, the impact will remain significant and unavoidable because while these mitigation measures may help to reduce changes in visual character, it would be infeasible to prevent changes to visual character while allowing implementation of the projects and development in the region. Similarly, no mitigation is available to prevent impacts associated with light and glare on a regional level. This impact is the result of a substantial number of land use changes and transportation network improvements over the next 40 years that will create a more urbanized region. The resulting character of the region will be more urban and less natural in many areas even though mitigation measures will be applied to each individual project. This change to a more urban environment will inevitably result in a degradation of the existing visual character. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Cumulative Aesthetics and Visual Resources (EIR Section 5.2.1)

Significant Impacts

Because cumulative aesthetic and visual resource impacts throughout the southern California and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental aesthetic and visual resource impacts are significant, the 2050 RTP/SCS incremental aesthetic and visual resource impacts associated with impacts VIS-1 and VIS-2 are cumulatively considerable.

Mitigation (EIR Section 4.1.5)

Implementation of Mitigation Measures VIS-A through VIS-E would reduce significant impacts associated with aesthetics and visual resources related to blocking panoramic views, views of significant landscape features, scenic highways, and/or the degradation of visual character and light and glare, but not to less than significant levels.
Findings and Rationale

For the significant cumulative impact to aesthetics and visual resources associated with VIS-1 and VIS-2, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures VIS-A through VIS-E have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures VIS-A through VIS-E are applied within their jurisdictions.

Although mitigation measures VIS-A through VIS-E reduce the significant impact related to blocking panoramic views or views of significant landscape features or landforms and substantially degrading the character of an area, the 2050 RTP/SCS incremental contribution to significant cumulative impacts will remain cumulatively considerable post-mitigation because some blocking of panoramic views or views of significant landscape features or landforms and degradation of the character of an area will occur. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains cumulatively considerable.

B. AGRICULTURE AND FOREST RESOURCES (EIR SECTION 4.2)

AG-1 Convert FMMP-designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use (2020, 2035, 2050)

Significant Impacts

By 2020, implementation of the 2050 RTP/SCS would result in growth/land use changes and the construction of transportation network improvements that together would convert 182.09 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to nonagricultural use. By 2035, 190.11 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland would be converted. By 2050, 3,485.09 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland would be converted.

Mitigation (EIR Section 4.2.5)

Implementation of Mitigation Measures AG-A and AG-B would reduce impacts, though not below a less than significant level.

AG-A For jurisdictions with FMMP-designated lands or agricultural resources, local governments can and should support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or
farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the agreements are upheld.

AG-B SANDAG shall and other implementing agencies can and should reduce potential conflicts with agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture, such as roadways, topographic features, and open space.

Findings and Rationale

For the significant impact resulting from conversion of FMMP-designated Prime Farmland, Unique Farmland and Farmland of Statewide Importance to nonagricultural use, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures AG-A and AG-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures AG-A and AG-B are applied within their jurisdictions.

Also, the programs identified in the mitigation measures for which other local agencies are responsible are generally voluntary and rely on the efforts of private landowners to continue agricultural operations. Establishment and participation in conservation programs are not required for local jurisdictions or private landowners. Additionally, local jurisdictions retain land use authority and are able to convert FMMP-designated lands to nonagricultural uses as deemed necessary to accommodate regional growth. Local jurisdictions may find it necessary to convert agricultural uses to residential uses to accommodate their share of the Regional Housing Needs Assessment distribution.

Although mitigation measures AG-A and AG-B reduce the significant impact resulting from conversion of FMMP-designated farmland, the impact will remain significant and unavoidable because some designated farmland will still be converted to non-agricultural use. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following additional mitigation measures and has determined they are infeasible for the reasons described below:

- Local governments could restrict development of land uses with allowable densities of 1 du/acre or more for lands currently designated for agriculture or lands adjacent to agriculture, due to potential incompatibilities with agricultural resources. Additionally, development would be restricted to that which is compatible in size and scope with existing agricultural resources if that development would occur within 0.5 mile of any agricultural resource.

This mitigation measure would be infeasible because it would restrict future development in areas identified for increased growth under the 2050 RTP/SCS growth forecast and local government land use plans. Conflicts with general plans would also exist in at least some jurisdictions. These
conflicts would make the mitigation infeasible because local governments are responsible for land use approvals, which are legally required to be consistent with general plans.

The 2050 RTP/SCS was developed in such a manner as to preserve agricultural uses while accommodating forecasted growth whenever feasible. However, mandating development restrictions as described in the above mitigation measure would conflict with the region’s ability to manage growth in a sustainable manner, which is a project objective of the 2050 RTP/SCS. A lower-density regional development pattern would be inconsistent with a fundamental project objective, which is to “provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns” (SANDAG 2011c). Additionally, restricting development of residential units may cause the 2050 RTP/SCS to be out of compliance with implementing the RHNA allocation, a requirement mandated by state law, or impede implementation of a local government’s Housing Element.

- SANDAG and implementing agencies could avoid impacts to FMMP-designated lands, lands with Williamson Act contracts, or agricultural preserves by proposing alternative sites that do not contain agricultural operations or sites with less productive soils, less intensive agricultural uses, or less potential to cause land use conflicts.

This mitigation measure would be infeasible to fully implement as local governments may not be able to locate alternative sites within their jurisdictional boundaries that would be compatible with development proposed in their land use plans. Development of alternative sites may not contribute to a sustainable land use pattern, conflicting with a primary 2050 RTP/SCS objective. Additionally, transportation network improvements may not be able to be located in alternative locations, especially if the improvement is an expansion of a highway or transportation corridor that is adjacent to lands with agricultural resources.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**AG-2 Conflict with existing agricultural uses, Williamson Act contract lands, and lands designated under the California Farmland Conservancy Act (2020, 2035, 2050)**

### Significant Impacts

By 2020, implementation of the 2050 RTP/SCS growth/land use changes and transportation network improvements would both conflict with 3,123.05 acres of land with agricultural uses, 73.43 acres of lands with Williamson Act contracts, and/or conservation easements created through the California Farmland Conservancy Act. By 2035, implementation of the 2050 RTP/SCS growth/land use changes and transportation network improvements would both conflict with 4,479.63 acres of land with agricultural uses and/or conservation easements created through the California Farmland Conservancy Act. By 2050, implementation of the 2050 RTP/SCS growth/land use changes and transportation network improvements would both conflict with 7,023.07 acres of land with agricultural uses and conservation easements created through the California Farmland Conservancy Act.

### Mitigation (EIR Section 4.2.5)

Implementation of Mitigation Measures AG-A and AG-B would reduce impacts, though not below a less than significant level.
AG-A For jurisdictions with FMMP-designated lands or agricultural resources, local governments can and should support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the agreements are upheld.

AG-B SANDAG shall and other implementing agencies can and should reduce potential conflicts with agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture, such as roadways, topographic features, and open space.

Findings and Rationale

For the significant impact to agricultural uses, Williamson Act contracts, and conservation easements created through the California Farmland Conservancy Act, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures AG-A and AG-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures AG-A and AG-B are applied within their jurisdictions.

Also, the programs identified in the mitigation measures for which other local agencies are responsible are generally voluntary and rely on the efforts of private landowners to continue agricultural operations. Establishment and participation in conservation programs are not required for local jurisdictions or private landowners. Additionally, local jurisdictions retain land use authority and are able to convert FMMP-designated lands to nonagricultural uses as deemed necessary to accommodate regional growth. Local jurisdictions may find it necessary to convert agricultural uses to residential uses to accommodate their share of the Regional Housing Needs Assessment distribution.

Although mitigation measures AG-A and AG-B reduce the significant impact resulting from conversion of FMMP-designated farmland, the impact will remain significant and unavoidable because some designated farmland will still be converted to non-agricultural use. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:

- Local governments could restrict development of land uses with allowable densities of 1 du/acre or more for lands currently designated for agriculture or lands adjacent to agriculture, due to potential incompatibilities with agricultural resources. Additionally, development would be restricted to that which is compatible in size and scope with existing
agricultural resources if that development would occur within 0.5 mile of any agricultural resource.

This mitigation measure would be infeasible because it would restrict future development in areas identified for increased growth under the 2050 RTP/SCS growth forecast and local government land use plans. Conflicts with general plans would also exist in at least some jurisdictions. These conflicts would make the mitigation infeasible because local governments are responsible for land use approvals, which are legally required to be consistent with general plans.

The 2050 RTP/SCS was developed in such a manner as to preserve agricultural uses while accommodating forecasted growth whenever feasible. However, mandating development restrictions as described in the above mitigation measure would conflict with the region’s ability to manage growth in a sustainable manner, which is a project objective of the 2050 RTP/SCS. A lower-density regional development pattern would be inconsistent with a fundamental project objective, which is to “provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns” (SANDAG 2011c). Additionally, restricting development of residential units may cause the 2050 RTP/SCS to be out of compliance with implementing the RHNA allocation, a requirement mandated by state law, or impede implementation of a local government’s Housing Element.

- SANDAG and implementing agencies could avoid impacts to FMMP-designated lands, lands with Williamson Act contracts, or agricultural preserves by proposing alternative sites that do not contain agricultural operations or sites with less productive soils, less intensive agricultural uses, or less potential to cause land use conflicts.

This mitigation measure would be infeasible to fully implement as local governments may not be able to locate alternative sites within their jurisdictional boundaries that would be compatible with development proposed in their land use plans. Development of alternative sites may not contribute to a sustainable land use pattern, conflicting with a primary 2050 RTP/SCS objective. Additionally, transportation network improvements may not be able to be located in alternative locations, especially if the improvement is an expansion of a highway or transportation corridor that is adjacent to lands with agricultural resources.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**FR-2 Result in loss of forest land (2020, 2035, 2050)**

**Significant Impacts**

Regional growth/land use development and transportation network improvements by 2020 together would result in a direct loss of 6,141.1 acres of forest land. By 2035 and 2050, regional growth development and transportation network improvements together would result in a direct loss of 8,592.1 acres and 15,882.2 acres of forest land, respectively.

**Mitigation (EIR Section 4.2.5)**

Implementation of Mitigation Measures FR-A and FR-B would reduce impacts, though not below a less than significant level.
FR-A During the design and CEQA review of development projects and transportation network improvements implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid impacting forest lands. Due to limited logging of forest lands in the San Diego region, the main reason to preserve forest land is to preserve quality native habitat. Where such impacts are unavoidable, the project design goal shall be replacement with equal or better quality habitat to ensure no net loss of the resource. Mitigation ratios for project-level impacts shall be determined through consultation with resource agencies and reference to applicable HCP/NCCP subarea plans.

FR-B When off-site mitigation is needed, SANDAG shall and other implementing agencies can and should provide it through acquisition and restoration (using EMP and other mitigation funds) of lands contiguous with areas of native habitat to maximize the biological value of the habitat provided as mitigation. Habitat acquisitions shall be coordinated with resource agencies and regional habitat conservation and planning efforts such as the MSCP and MHCP.

Findings and Rationale

For the significant impact to forest land, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures FR-A and FR-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures FR-A and FR-B are applied within their jurisdictions.

Local jurisdictions retain land use authority and are able to convert forest land to non-forest uses as deemed necessary to accommodate regional growth. Local jurisdictions may find it necessary to convert forest land to residential uses to accommodate their share of the Regional Housing Needs Assessment distribution.

Although mitigation measures FR-A and FR-B reduce the significant impact resulting from loss of forest land, the impact will remain significant and unavoidable because some forest land will still be converted to non-forest use. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Agriculture and Forest Resources (EIR Section 5.2.2)**

**Significant Impacts**

Because cumulative impacts to agriculture and forest resources throughout California by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts to agriculture and forest resources are significant, the 2050 RTP/SCS incremental impacts to
agriculture and forest resources associated with impacts AG-1, AG-2 and FR-2 are also cumulatively considerable.

Mitigation (EIR Section 4.2.5)

Implementation of mitigation measures AG-A, AG-B, FR-A and FR-B above would reduce these impacts though not to less than significant levels.

Findings and Rationale

For these significant cumulative impacts associated with AG-1, AG-2 and FR-2, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures AG-A, AG-B, FR-A and FR-B have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures AG-A, AG-B, FR-A and FR-B are applied within their jurisdictions.

Local jurisdictions retain land use authority and are able to convert agricultural and forest land to non-forest uses as deemed necessary to accommodate regional growth. Local jurisdictions may find it necessary to convert agricultural and forest land to residential uses to accommodate their share of the Regional Housing Needs Assessment distribution.

Although mitigation measures AG-A, AG-B, FR-A and FR-B reduce the significant impact resulting from loss of agricultural and forest land associated with impact AG-1, AG-2 and FR-2, the 2050 RTP/SCS incremental contribution to significant cumulative impacts will remain cumulatively considerable because some agricultural and forest land will still be converted to non-agricultural and non-forest uses. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR and discussed above, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable.

C. AIR QUALITY (EIR SECTION 4.3)

AQ-1 (Impact associated with regional growth/land use changes) Conflict with or obstruct the implementation of applicable air quality plans (2020,2035, 2050)

Significant Impacts

The degree to which construction and use emissions from regional growth/land use changes in the 2050 RTP/SCS conflict with or obstruct the implementation of applicable attainment plans will be determined through individual project-level analysis. At the program level however, the emissions impact of regional growth and land use changes in the 2050 RTP/SCS is considered to be a significant impact. Regional growth and land use changes based on increased population by 2020 would generate future air emissions from the construction and use of new residential, commercial,
industrial, and recreation land uses. The emissions from the 2020, 2035 and 2050 growth will only be consistent with the applicable attainment and maintenance plans for those points in time, if the adopted city and county general plans accommodate the 2050 RTP/SCS growth projections when the applicable attainment and maintenance plans are updated. Since these general plans and air quality plans are not updated concurrently, consistency cannot be assured and the impact is considered significant at the program level.

Mitigation (EIR Section 4.3.5).

Implementation of mitigation measures AQ-A1 would reduce these impacts though not to a less than significant level.

**AQ-A1**

For land use plans and projects, cities in the San Diego region and San Diego County can and should assess increases in ozone precursors during project-specific design and CEQA review, and mitigate significant increases to the extent feasible. Measures described in Mitigation Measure GHG-B would also generally be applicable to ozone precursors, since most measures reducing GHG emissions also reduce ozone precursor emissions.

Specifically, at the plan level, land use plans should, when appropriate, incorporate planning and land use measures from the California Attorney General’s latest list of example policies to address climate change (http://ag.ca.gov/globalwarming/pdf/GP_policies.pdf), including, but not limited to policies from that web page such as:

- Smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, incentives and fees, zoning, and public-private partnerships
- Create transit, bicycle, and pedestrian connections through planning, funding, development requirements, incentives and regional cooperation, and create disincentives for auto use
- Energy and water-efficient buildings and landscaping through ordinances, development fees, incentives, project timing, prioritization, and other implementing tools

In addition, they should also incorporate, when appropriate, policies to encourage implementation of the Attorney General’s list of project specific mitigation measures available at the following web site: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf, including, but not limited to measures from the web page such as:

- Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation
- Build or fund a major transit stop within or near development
- Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers
- Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments
• Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.

They should also incorporate, when appropriate, planning and land use measures from additional resources listed by the California Attorney General at the following web page: http://ag.ca.gov/globalwarming/ceqa/resources.php.

Findings and Rationale

In 2020, 2035, and 2050, implementation of the regional growth and land use changes associated with the 2050 RTP/SCS would conflict with or obstruct the implementation of applicable air quality plans. For AQ-1 at the program level of this EIR, ozone precursor (ROG and NO\textsubscript{X}) and CO emission impacts of regional growth and land use change in 2020, 2035, and 2050 are considered to remain significant post-mitigation. SANDAG must base its RTP/SCS growth forecast on current planning assumptions, and has no legal authority to modify local general plans or development projects to reduce growth-related air emissions. Therefore, there are no additional feasible mitigation measures at the program level for ozone and CO emissions due to regional growth and land use change that can be proposed at this time. For this significant impact, the SANDAG Board of Directors finds that the ozone precursor (ROG and NO\textsubscript{X}) and CO emission impacts of regional growth and land use change in 2020, 2035, and 2050 are significant and that additional mitigation measures at the program level are infeasible.

To determine whether emissions from 2020, 2035 and 2050 growth would be consistent with applicable air quality plans for same years, the proposed development for each year would need to be consistent with the growth anticipated by individual adopted city and county general plans for that year, and thereby consistent with the applicable attainment and maintenance plans. In other words, the proposed amount of housing development by 2020, 2035 and 2050 would need to be less than the development capacity of the general plans in the SANDAG region at that same time. Emission analyses related to regional growth and land use change of the 2050 RTP/SCS in 2020, 2035 and 2050 would be analyzed at the level of individual development projects to determine whether their emissions of the nonattainment pollutants of ozone precursors (ROG and NO\textsubscript{X}) and maintenance pollutants of CO would conflict with or obstruct implementation of air quality ozone attainment and CO maintenance plans for 2020, 2035 and 2050. Since air quality plans will be updated periodically over the next 40 years, consistency of projected growth with those plans will occur at the points in time when the plans are updated. Since city and county general plans and air quality attainment and maintenance plans are not updated concurrently, some inconsistency between these plans can be expected to exist during the next 40 years. This inconsistency could only be resolved if both types of plans were continually updated to achieve consistency year after year. However, this kind of constant year-by-year focus on achieving consistency between city and county general plans and air quality attainment and maintenance plans is unrealistic given that such plans often require multiple years for each to be updated. Therefore, there are no additional feasible mitigation measures at the program level for ozone and CO emissions due to regional growth and land use change that can be proposed at this time.

The SANDAG Board of Directors also finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable.
**AQ-2 Violate air quality standards or contribute substantially to an existing or projected air quality violation (2020, 2035, 2050)**

**Significant Impacts**

At the program level, emissions impacts of regional growth and land use change are considered to be a significant impact. The degree to which regional growth and land use construction and use emissions of the 2050 RTP/SCS violate air quality standards or contribute to an existing or projected air quality violation in 2020, 2035 and 2050 will be determined during individual project-level analysis.

The modeled emissions of PM$_{10}$ and PM$_{2.5}$ for the 2050 RTP/SCS transportation improvements by 2020, 2035 and 2050 (located in EIR Appendix B and summarized in Tables 4.3-3 and 4.3-4) would be greater than the 2010 baseline emissions of PM$_{10}$ and PM$_{2.5}$. Because the area is designated as state nonattainment for PM$_{10}$ and PM$_{2.5}$, the impact would be significant.

Therefore, when considered together, the regional growth/land use changes and transportation network improvements in 2020, 2035 and 2050 would violate air quality standards or contribute substantially to an air quality violation, a significant impact.

**Mitigation (EIR Section 4.3.5)**

Implementation of Mitigation Measure AQ-A would be required to reduce PM$_{10}$ and PM$_{2.5}$ impacts.

**AQ-A2**

During project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should incorporate project-appropriate dust control measures into project specifications, including but not limited to the following:

- Minimize land disturbance.
- Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas.
- Suspend grading and earth moving when wind gusts exceed 25 mph unless the soil is wet enough to prevent dust plumes.
- Cover trucks when hauling dirt.
- Stabilize the surface of dirt piles if not removed immediately.
- Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
- Minimize unnecessary vehicular and machinery activities.
- Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
Findings and Rationale

For these significant impacts to air quality, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure AQ-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure AQ-A is applied within their jurisdictions.

Although mitigation measure AQ-A reduces the significant impact to air quality standards, the impact will remain significant and unavoidable because implementation of Mitigation Measure AQ-A would not guarantee that the impact would be reduced to less than significant. Furthermore, to determine whether the Project emissions from the 2020, 2035, and 2050 regional growth and land use changes would be consistent with the applicable attainment and maintenance plans in 2020, 2035, and 2050, the proposed Project development would need to be consistent with the growth anticipated by the adopted city and county general plans at that time.

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

**AQ-3 Result in a cumulatively considerable net increase of emissions of nonattainment pollutants (2020, 2035, 2050)**

**Significant Impacts**

At the program level, emission impacts of regional growth and land use change are considered a significant impact. In addition, the modeled increase of PM\(_{10}\) and PM\(_{2.5}\) emissions for the transportation improvements from 2010 to 2020, 2010 to 2035, and 2010 to 2050 would be a cumulatively considerable net increase and, therefore, a significant impact. When considered together, the regional growth/land use changes and transportation network improvements would result in a significant impact for 2020, 2035 and 2050. The degree to which project-specific construction and use emissions from regional growth/land use changes would result in a cumulatively considerable net increase of emissions of nonattainment pollutants in 2020, 2035 and 2050 will be determined during individual project-level analysis.

**Mitigation (EIR Section 4.3.5)**

Implementation of Mitigation Measure AQ-A1, AQ-A2 above, and AQ-B and AQ-C would be required to reduce impacts.

**AQ-B**

If project-level analysis demonstrates that NO\(_X\) emissions would be significant, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should provide a plan, for approval by the implementing agency or jurisdiction, demonstrating that the heavy-duty (>50
horsepower) offroad vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will utilize all feasible measures to reduce the NO\textsubscript{X} emissions to a less than significant level. Acceptable options for reducing emissions may include use of late model engines, low emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

The project representative shall submit to the implementing agency or jurisdiction a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide the implementing agency or jurisdiction with the anticipated construction timeline, including start date, and name and phone number of the project manager and on-site foreman.

**AQ-C Transportation Network Improvements**

For transportation network improvements, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should evaluate the potential localized CO impacts of each project using procedures and guidelines contained in the CO Protocol (UCD ITS 1997) to determine the level of local CO “hot spot” analysis required (qualitative or quantitative) at the project level, if any, for the project. If required from the project analysis, mitigation measures would be added to the project design concept or scope to reduce local CO emissions.

For transportation network improvements, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should evaluate the potential localized particulate (PM10 and PM2.5) impacts and their health risks of project using procedures and guidelines for PM hotspot analysis consistent with USEPA (2010) PM guidance. If required from the project analysis, mitigation measures would be added to the project design concept or scope to reduce local particulate (PM10 and PM2.5) emissions. Per USEPA (2010) PM guidance, potential mitigation measures to be considered include but are not limited to: providing a retrofit program for older higher emitting vehicles, anti-idling requirements or policies, controlling fugitive dust, routing traffic away from populated zones, and replacing older buses with cleaner buses.

**Land Use Plans and Development Projects**

For land use plans and projects, cities in the San Diego region and San Diego County can and should assess health risks associated with CO and particulates during project-specific design and CEQA review, and mitigate them to the extent feasible. These assessments should focus on sensitive communities already experiencing high levels of air pollution and related diseases, and on other sensitive receptors.
For development projects, mitigation measures to reduce air pollution-related health risks include but are not limited to:

- Avoiding siting new sensitive land uses within 500 feet from the right of way of a freeway
- Implementing the construction mitigation measures listed in Mitigation Measures AQ-A2 and AQ-B
- Buffering residential, public assembly, and other sensitive land uses from industrial uses generating air pollutants that may pose public health risks
- Including landscaping, barriers, ventilation systems, and air filters or cleaners in project designs

Health Risk Assessments for Projects Involving Transportation Network Improvements or Land Use Plans and Development Projects

During project specific design and CEQA review, SANDAG shall and other implementing agencies can and should require, where warranted, the completion of health risk assessments using dispersion modeling. A health risk assessment (HRA) is the quantitative evaluation of the risk of cancer (and sometimes non-cancer health effects) that may result from human exposure to pollutants such as toxic air pollutants. HRAs are complex and typically involve emissions quantification, air dispersion modeling, and risk modeling. Dispersion modeling is a modeling tool capable of predicting concentrations of pollutants in air in the vicinity of the pollutant sources. It is typically used to predict PM concentrations at receptor locations around a source of PM. AERMOD and CALPUFF are two of several dispersion modeling tools.

Findings and Rationale

For these significant impacts to air quality, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures AQ-1A, AQ-2A, AQ-B and AQ-C have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures AQ-A and AQ-B are applied within their jurisdictions.

Although mitigation measures AQ-A1, AQ-A2, AQ-B and AQ-C reduce this significant air quality impact, it remains significant and unavoidable because implementation of Mitigation Measures AQ-A1, AQ-A2, AQ-B and AQ-C would not guarantee that the impact would be reduced to less than significant. The modeled increase of PM$_{10}$ and PM$_{2.5}$ emissions for the transportation improvements from 2010 to 2020, 2035 and 2050 would be a cumulatively considerable net increase, and conformance of the 2020, 2035 and 2050 emissions with the RAQS, would be determined at the project level and the impact at the program level would be significant. When considered together, the 2020, 2035 and 2050 regional growth/land use changes and transportation network improvements would result in a significant impact.
For AQ-3, at the program level of this EIR, ozone precursor (ROG and NOx) and CO emission impacts of regional growth and land use change in 2020, 2035, and 2050 are considered to remain significant post-mitigation. SANDAG must base its RTP/SCS growth forecast on current planning assumptions, and has no legal authority to modify local general plans or development projects to reduce growth-related air emissions. Therefore, there are no additional feasible mitigation measures at the program level for ozone and CO emissions due to regional growth and land use change that can be proposed at this time.

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

**AQ-4 Expose sensitive receptors to substantial pollutant concentrations (2020, 2035, 2050)**

**Significant Impacts**

Implementation of the 2050 RTP/SCS would result in significant impacts at the program level in 2020, 2035, and 2050 by exposing sensitive receptors to substantial localized pollutant concentrations, including local CO, PM2.5 and PM10, and toxics.

**Mitigation (EIR Section 4.3.5)**

Implementation of Mitigation Measure AQ-C would be required to reduce impacts.

**AQ-C Transportation Network Improvements**

For transportation network improvements, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should evaluate the potential localized CO impacts of each project using procedures and guidelines contained in the CO Protocol (UCD ITS 1997) to determine the level of local CO “hot spot” analysis required (qualitative or quantitative) at the project level, if any, for the project. If required from the project analysis, mitigation measures would be added to the project design concept or scope to reduce local CO emissions.

For transportation network improvements, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should evaluate the potential localized particulate (PM10 and PM2.5) impacts and their health risks of project using procedures and guidelines for PM hotspot analysis consistent with USEPA (2010) PM guidance. If required from the project analysis, mitigation measures would be added to the project design concept or scope to reduce local particulate (PM10 and PM2.5) emissions. Per USEPA (2010) PM guidance, potential mitigation measures to be considered include but are not limited to: providing a retrofit program for older higher emitting vehicles, anti-idling requirements or policies, controlling fugitive dust, routing traffic away from populated zones, and replacing older buses with cleaner buses.

**Land Use Plans and Development Projects**

For land use plans and projects, cities in the San Diego region and San Diego County can and should assess health risks associated with CO and particulates
during project-specific design and CEQA review, and mitigate them to the extent feasible. These assessments should focus on sensitive communities already experiencing high levels of air pollution and related diseases, and on other sensitive receptors.

For development projects, mitigation measures to reduce air pollution-related health risks include but are not limited to:

- Avoiding siting new sensitive land uses within 500 feet from the right of way of a freeway
- Implementing the construction mitigation measures listed in Mitigation Measures AQ-A2 and AQ-B
- Buffering residential, public assembly, and other sensitive land uses from industrial uses generating air pollutants that may pose public health risks
- Including landscaping, barriers, ventilation systems, and air filters or cleaners in project designs

Health Risk Assessments for Projects Involving Transportation Network Improvements or Land Use Plans and Development Projects

During project specific design and CEQA review, SANDAG shall and other implementing agencies can and should require, where warranted, the completion of health risk assessments using dispersion modeling. A health risk assessment (HRA) is the quantitative evaluation of the risk of cancer (and sometimes non-cancer health effects) that may result from human exposure to pollutants such as toxic air pollutants. HRAs are complex and typically involve emissions quantification, air dispersion modeling, and risk modeling. Dispersion modeling is a modeling tool capable of predicting concentrations of pollutants in air in the vicinity of the pollutant sources. It is typically used to predict PM concentrations at receptor locations around a source of PM. AERMOD and CALPUFF are two of several dispersion modeling tools.

Findings and Rationale

For these significant air quality impacts, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure AQ-C have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure AQ-C is applied within their jurisdictions.

Although mitigation measure AQ-C will reduce this impact, it will remain significant and unavoidable. Since many of the transportation network improvements are linear facilities that pass through one or more city or county jurisdictions containing a variety of existing and planned land uses, exposing sensitive receptors to substantial pollutant concentrations cannot be avoided entirely. Although mitigation measures AQ-C will reduce this impact to a degree, existing sensitive
receptors currently affected by the transportation network will continue to exist as improvements are made unless these receptors are relocated so as not to be impacted. Although relocation of sensitive receptors may be feasible as mitigation for transportation network improvement projects, individual property owners or business owners that are impacted must decide if they want to relocate or instead accept the impact and remain in place. Where an impacted property owner or business owner decides to remain, no feasible mitigation measure exists that would force relocation of a sensitive receptor.

For AQ-4, implementation of the 2050 RTP/SCS in 2020, 2035, and 2050 would result in significant impacts at the program level post-mitigation; impact significance for specific projects would be determined at the individual project-level analysis as projects are proposed, using the hot spot and health risk assessment procedures described in Mitigation Measure AQ-C. No additional mitigation measures are available at the program level.

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

**Cumulative Air Quality (EIR Section 5.2.3)**

**Significant Impacts**

Because cumulative air quality impacts associated with impacts AQ-1, AQ-2, AQ-3 and AQ-4 throughout the southern California region and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental air quality impacts are significant, the 2050 RTP/SCS incremental air quality impacts are also cumulatively considerable.

**Mitigation (EIR Section 4.3.5)**

Implementation of mitigation measures AQ-A1, AQ-A2, AQ-B, and AQ-C above would reduce project air quality impacts associated with AQ-1, AQ-2, AQ-3 and AQ-4, though not to less than significant levels. Mitigation measure AQ-C requires SANDAG and other jurisdictions to conduct a full project level CO analysis when deemed appropriate from applicable screening procedures.

**Findings and Rationale**

For the significant air quality impacts associated with AQ-1, AQ-2, AQ-3 and AQ-4, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures AQ-A1, AQ-A2, AQ-B, and AQ-C have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures AQ-A1, AQ-A2, AQ-B, and AQ-C are applied within their jurisdictions.
Although mitigation measures AQ-A1, AQ-A2, AQ-B, and AQ-C reduce the significant impact to air quality associated with impacts AQ-1, AQ-2, AQ-3 and AQ-4, the 2050 RTP/SCS incremental contribution to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that these mitigation measures would reduce impacts to all development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

D. BIOLOGICAL RESOURCES (EIR SECTION 4.4)

BIO-1 Impact any sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; or on federally protected wetlands (2020, 2035, 2050)

Significant Impacts

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in regional growth/land use changes and the construction of transportation network improvements that would both cause a substantial adverse change to sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFG or USFWS; or regulated wetlands as defined by Section 404 of the CWA or resources regulated by the CDFG under California Fish and Game Code Section 1600 et seq, through direct removal, filling, hydrological interruption, or other means.

Mitigation (EIR Section 4.4.5)

Implementation of Mitigation Measures BIO-A, BIO-B, BIO-C, BIO-D, and BIO-E would reduce these impacts, though not to less than significant levels.

BIO-A

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid impacting sensitive vegetation communities. Where unavoidable, compensatory mitigation for impacts shall be required as specified through consultation with resource agencies and in approved Multiple Species Conservation Program (MSCP) or Multiple Habitat Conservation Program (MHCP) documents; and the County of San Diego’s Biological Mitigation Ordinance (BMO), Resource Protection Ordinance (RPO), County of San Diego Guidelines for Determining Significance for Biological Resources, Habitat Loss Permit (HLP) ordinance, City of San Diego’s Environmentally Sensitive Lands (ESL) regulations, City of Chula Vista’s Habitat Loss and Incidental Take (HLIT) regulations, and all other NCCP implementing ordinances for all vegetation communities. Compensatory mitigation is intended to result in the establishment of self-sustaining sensitive vegetation communities, replacing the lost habitat and/or habitat value, as required to offset those lost to the impacts and meet the requirements of all applicable agency and adopted plans, ordinances, and policies. Appropriate mitigation ratios and maintenance and monitoring requirements will be determined by these plans and/or ordinances, depending on the location of the impact and the affected sensitive vegetation.
community. Consistent with the above plans and ordinances, compensatory mitigation outside the Coastal Zone may be provided either through the purchase of credits at an existing authorized mitigation bank or in lieu fee program, or through project-specific mitigation. Compensatory mitigation for impacts inside the Coastal Zone may not be satisfied through in lieu fee programs and should occur within the Coastal Zone as close as is feasible to the impact. To the extent allowed by the above plans and ordinances, project specific mitigation may be provided through on-site restoration of temporary impacts, on-site or off-site preservation of existing habitats, or off-site restoration. On-site or off-site restoration areas used as mitigation should be maintained and monitored for a minimum of 5 years, but maintenance and monitoring shall continue until required success criteria are achieved. If the restoration is not meeting success criteria, remedial measures shall be implemented and would typically include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods. After final success criteria have been met and relevant permitting agencies have approved the mitigation project as complete, all mitigation areas be permanently conserved (e.g. conservation easement) and managed in perpetuity. As the CEQA lead agency, SANDAG shall and other lead agencies can and should review and approve all restoration plans prior to their implementation. Impacts to other sensitive vegetation communities that may occur as the result of implementing this measure include direct loss and indirect effects.

BIO-B

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid impacting jurisdictional wetlands and other waters (including jurisdictional vernal pools). Where unavoidable, such impacts shall be mitigated. Mitigation may be provided either through the purchase of credits at an existing authorized mitigation bank or in lieu fee program, or through project-specific mitigation. Compensatory mitigation for impacts inside the Coastal Zone may not be satisfied through in lieu fee programs and should occur within the Coastal Zone as close as is feasible to the impact. The mitigation ratio for jurisdictional wetlands shall be a minimum of 2:1 for the permanent loss of acreage to provide for no net loss of wetlands, however, project-level consultation with USACE and CDFG may result in a higher ratio. A minimum on-site mitigation/restoration ratio of 1:1 shall be provided for temporary impacts, unless USACE and CDFG determine otherwise higher ratio. A mitigation and monitoring plan completed per the requirements of USACE and CDFG shall be prepared for all impacts to jurisdictional waters. This plan shall include details regarding site appropriateness, preparation (e.g., grading), recontouring, planting specifications (including seed mixes and plant palettes), and irrigation design (if determined necessary), as well as maintenance and monitoring procedures (including monitoring period and reporting). Impacts to other sensitive vegetation communities that may occur as the result of implementing this measure include direct loss and indirect effects related to changes in hydrology and species composition. The plan shall also identify locally appropriate plant species for the mitigation/restoration plan, and outline yearly success criteria and remedial measures should the mitigation effort fall short of the success criteria. Success criteria shall be sufficient to create self-
sustaining habitat providing the functions and values required to offset those lost to the impacts and meet the requirements of all applicable agency and adopted plans, ordinances, and policies. Remedial measures typically include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods.

**BIO-C**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should include implementation of location-specific measures to avoid and minimize construction- and/or operation-generated dust, erosion, runoff, and sedimentation within or into habitats. Projects shall implement appropriate water pollution control technology and BMPs to avoid or minimize impacts to downstream aquatic systems. Such measures and BMPs may include, but are not limited to, construction fencing, site watering, silt fencing, gravel bags, stabilized construction entrances, straw wattles, erosion control blankets, temporary seeding, soil polymers, and similar measures. All mitigation measures related to soil erosion, sedimentation, and dust control contained in other sections of this report shall also be followed.

**BIO-D**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should limit all grading and earth-moving activities to within the planned transportation facility footprint. Construction staging and access areas shall be located in previously disturbed and/or developed areas to the greatest extent feasible. All construction materials, staging, storage, dispensing, fueling, and maintenance activities shall be located in upland areas outside of sensitive habitat, and adequate measures shall be taken to prevent any potential runoff from entering jurisdictional waters. Fueling of equipment shall take place within existing paved roads. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. All construction activities shall be monitored by qualified biologists when construction is occurring in, or adjacent to, sensitive habitat or areas suitable for special status species, and the biologist shall be granted the authority to stop work if it deviates from approved plans and mitigation measures. The qualified biologist shall ensure that construction staging, equipment, and fencing are not directing wildlife towards roadways or urban areas and that some functional wildlife movement is maintained in situations where construction may bisect contiguous habitat. The biologist shall possess relevant expertise for the affected resources and shall be approved by the CEQA lead agency for the project.

**BIO-E**

When off-site mitigation is needed, during the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should provide off-site mitigation through acquisition and restoration (using EMP and other mitigation funds) of lands contiguous with areas of native habitat to maximize the biological value of the habitat provided as mitigation, through purchase of relevant habitat credits at an approved mitigation bank, or through payment into an approved in-lieu mitigation fee program applicable to the impacts (in lieu fee programs shall not be used to provide mitigation for impacts located within the Coastal Zone). When mitigation is provided outside of an adopted NCCP/HCP the following
conditions shall apply to the maximum extent practicable: mitigation lands will be connected to existing conserved open space; consideration will be given to contributing in the establishment of large blocks of habitat or lands which are otherwise critical for covered species and/or providing for biological core areas and habitat linkages consistent with current regional conservation planning goals; and impacts to critical habitat will be mitigated within the same Critical Habitat Unit where the impacts occurred. Mitigation lands must be protected in perpetuity (e.g. through a conservation easement or similar legal protection) and adequately managed to maintain the originally intended biological quality and function in perpetuity. Habitat acquisitions, bank purchases, or fee program payments shall be coordinated with resource agencies and regional habitat conservation and planning efforts such as the MSCP and MHCP.

Findings and Rationale

For the significant impact to these biological resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures BIO-A through BIO-E have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures BIO-A through BIO-E are applied within their jurisdictions.

While implementation of Mitigation Measures BIO-A through BIO-E would reduce direct and indirect impacts on any sensitive natural community identified in local or regional plans, policies, regulations, or by CDFG or USFWS, or on federally protected wetlands as defined by Section 404 of the CWA or California Fish and Game Code Section 1600 et seq. through direct removal, filling, hydrological interruption, or other means, there is no assurance that these mitigation measures would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. For example, while it is probable that all direct impacts to vegetation communities will be adequately mitigated to below a level of significance, it is possible that some portion of indirect impacts from hydrologic changes, particulate air pollution, and/or erosion and sedimentation will persist after implementation of all mitigation measures. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**BIO-2 Impact any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (2020, 2035, 2050)**

Significant Impacts

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements that would both cause a substantial
adverse change to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFG or USFWS.

**Mitigation (EIR Section 4.4.5)**

Implementation of Mitigation Measures BIO-F, BIO-G, BIO-H, BIO-I, BIO-J, BIO-K, and BIO-L would reduce these impacts, though not to less than significant levels.

**BIO-F**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should consult the resource agencies, regional databases, and local agencies to identify the current list of special status wildlife species occurrences and areas of occupied special status species habitat. Focused surveys for species shall be conducted as required by resource agency protocols (e.g., arroyo toad or least’s Bell vireo) or consultation within suitable habitat and during the appropriate field conditions for detection prior to any activity that may result in impacts. Surveys shall be conducted by a qualified biologist approved by the CEQA lead agency. Special status species without survey protocols will be recorded as observed during other focused and/or reconnaissance surveys during the appropriate field conditions for detection. If an individual project has the potential to result in “take” of a special status wildlife species, all appropriate take authorizations (e.g. Section 2081 Incidental Take Permit, Section 7) will be acquired prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations. Projects shall be designed to minimize or eliminate impacts to known special status wildlife species and implement species-specific avoidance, minimization, and/or mitigation measures.

**BIO-G**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should consult the resource agencies to identify known special status plant species occurrences. If an individual project has the potential to result in “take” of a special status plant species, all appropriate take authorizations (e.g. Section 2081 Incidental Take Permit, Section 7) will be acquired prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations. Project designs shall reduce direct impacts to special status plant species by avoidance whenever feasible. A species and habitat compensation plan shall be prepared for unavoidable direct impacts on special status plant species, and shall be reviewed and approved by the resource agencies and CEQA lead agency prior to project approval. The plan shall identify effective methods for reestablishing the affected species and habitat, including but not limited to seed collection, salvage of root masses, and planting seeds and/or root masses in an area with suitable conditions. The plan shall also specify a monitoring program designed to evaluate success in reestablishing the affected species and habitat, and remedial measures that shall be followed if the project is not meeting specified performance criteria. The monitoring program shall be designed to evaluate the current and probable future health of the resources, and their ability to sustain populations in keeping with natural populations following the completion of the program. Remedial measures are highly dependent upon the species and habitats in question, but generally shall include but not be limited to exotic species management, predator control, access control, replanting and reseeding of appropriate habitat elements, regarding, and propagation and seed bulking programs.
**BIO-H**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid any clearing of vegetation within the breeding season of special status wildlife species (e.g., raptors and migratory birds, generally February 1 through September 1; arroyo toad, March 15 through July 1; Laguna Mountains skipper and Quino checkerspot butterfly, generally late February to early March) to avoid impacts to species. If activities must occur during special status species breeding season timeframes, a preconstruction survey by a qualified biologist shall be conducted to determine whether the species of concern are present within the proposed work area. If the species of concern are found on-site, the project shall implement measures to avoid impacts. Such measures shall be identified by project-specific CEQA documents, project permits, or the project biologist as necessary and may include delaying construction activities in all or part of the project until environmental conditions allow. For bird species, this is typically when nesting/fledging is complete. If construction activities must occur during the arroyo toad breeding season, a qualified biologist shall conduct preconstruction surveys and with wildlife agency approval translocate the arroyo toads and their eggs, tadpoles, or neonates to an area with appropriate habitat outside the construction limits. Translocation shall target the closest possible suitable habitat unless translocation to that location would transmit disease, exceed carrying capacities for the species, or cause other deleterious effects to the existing population at the translocation receiver site. If these translocation impacts to the receiver site are expected, other suitable sites without an existing arroyo toad population shall be considered for use as the receiver site, or compensatory mitigation shall be considered.

**BIO-I**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should modify designs to avoid impacts to vernal pools occupied by San Diego or Riverside fairy shrimp whenever feasible. Unavoidable impacts to habitat occupied by San Diego or Riverside fairy shrimp shall be mitigated through enhancement of degraded pools (e.g., exotics control, recontouring, replanting of native species) and/or creation of more occupied pools (e.g., via grading of new pools and/or translocation of shrimp to existing unoccupied pools). Creation of new pools or enhancement of existing pools shall avoid or minimize to the greatest practicable extent any new impacts to vernal pools or their watersheds and to other sensitive vegetation communities.

**BIO-J**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should incorporate measures to avoid and minimize temporary and/or permanent indirect impacts to aquatic species from construction- and/or operation-generated dust, erosion, runoff, and sedimentation within or into habitats supporting aquatic species. Such measures shall include implementation of Mitigation Measure BIO-C and location-specific measures as identified during project-specific review.

**BIO-K**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should incorporate measures to avoid and minimize temporary and/or permanent indirect impacts to terrestrial wildlife species. Anticipated impact zones, including staging areas, equipment access, and disposal or temporary placement of spoils, shall be
delineated with stakes and flagging prior to construction to avoid natural resources where possible. Such measures shall include noise attenuation measures if construction levels exceed preconstruction ambient noise levels within adjacent habitat as specified during project-specific review. Implement Mitigation Measures NO-1 through NOI-4 when permanent or temporary noise is identified as an impact to wildlife. Nighttime project lighting shall be directed at the project site or the construction site and away from sensitive habitats. Light glare shields shall be used to reduce the extent of illumination onto adjoining areas. Permanent lighting shall be shielded and directed at intended use areas. Fencing and/or walls shall be built to avoid temporary or permanent access of humans or domestic animals from development areas into areas occupied by special status species. Spoils, trash, or any debris shall be removed offsite to an approved disposal facility. Trash and food items shall be contained in closed containers and removed daily to reduce the attractiveness to opportunistic predators such as coyotes and feral dogs and cats that may prey on sensitive species. Workers shall be prohibited from bringing pets and firearms to the site.

**BIO-L**  
See Mitigation Measures BIO-A through BIO-E.

**Findings and Rationale**

For the significant impact to these biological resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures BIO-F through BIO-L have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures BIO-F through BIO-L are applied within their jurisdictions.

Local jurisdictions retain land use authority and are able to impact biological resources as deemed necessary to accommodate regional growth. Local jurisdictions may find it necessary to convert vacant land containing biological resources to residential uses to accommodate their share of the Regional Housing Needs Assessment distribution.

Although mitigation measures BIO-F through BIO-L reduce the significant impact resulting from loss of or impact to biological resources, the impact will remain significant and unavoidable because there is no assurance that these mitigation measures would reduce impacts of all development and transportation network improvement projects to a less than significant level. While it is probable that all direct and indirect impacts to special status, candidate and sensitive species are likely to be mitigated to a less than significant level, indirect impacts from noise, air pollution, wildfire, spread of invasive species, and human presence are not completely controllable despite implementation of mitigation measures. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.
**BIO-3 Impact the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites (2020, 2035, 2050)**

**Significant Impacts**

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements that would cause a substantial adverse change to movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

**Mitigation (EIR Section 4.4.5)**

Implementation of mitigation measures BIO-M, BIO-N, BIO-O, and BIO-P would reduce these impacts, though not to less than significant levels.

**BIO-M**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should conduct wildlife movement studies for projects that may fragment or constrict regional or local corridors and impede use to nursery sites. These studies will include, but would not be limited to, the following objectives: identify activity levels and directional wildlife movement trends within the study area, assess current functionality of existing underpasses, and determine what species or groups of species exhibit sensitivity to the existing roadways. Movement studies shall identify project-specific measures to avoid or mitigate impacts to corridors and movement to nursery sites that may include, but are not limited to, developing alternative project designs that allow wider movement corridors to remain; provide for buffer zones adjacent to corridors, such as passive recreation zones); implement physical barriers that prevent human and/or domestic predator entry into the corridor or block noise and lighting from development; incorporate shielded and directed lighting in areas near corridors; incorporate periodic larger habitat patches along a corridor’s length; minimize the number of road crossings of identified wildlife corridors; and replace roadway culverts with bridges to allow for wildlife movement.

**BIO-N**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should provide for continued movement of wildlife by assisting wildlife navigation through or across barriers in areas where wildlife corridors and nursery sites are identified in this document, adopted HCP/NCCPs, or movement studies that identify evidence of wildlife movement. Bridges and/or other undercrossings that allow continued movement of wildlife shall be incorporated where roads or transit features would create barriers to wildlife movement and use of nursery sites. Size-class-specific crossing structures shall be evaluated for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, aquatic barriers will be made passable for migratory fish species in order to have the functional effect of fish access to spawning and rearing habitats. Directional fencing shall be considered to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or...
other crossing structures. Where fencing stops, the fence should extend and angle away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, one-way gates should be used so animals that do get around fence end runs can safely exit roadways.

**BIO-O**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should provide for the maximum feasible continuing function of identified wildlife corridors by limiting edge effects of development. Corridor buffers, shielded and directed lighting, fencing, restriction of nonnative species in landscaping, maintaining natural landforms, and similar measures shall be implemented as needed to maintain function. Undercrossings and/or other crossing structures, such as culverts, may become filled with sand, silt, litter, debris, or dense vegetation rendering them unviable as corridors. Additionally, erosion can damage the integrity of directional fencing and the effectiveness of corridors can deteriorate over time. Therefore, fencing, undercrossings, and/or other crossing structures shall be monitored and maintained as needed to ensure corridor permeability and functionality. Development and implementation of a fencing and wildlife crossing structure maintenance plan is recommended to maintain permeability for wildlife across corridors. Corridor design shall comply with all requirements of current HCP/NCCP planning documents and local ordinances including but not limited to the BMO.

**BIO-P**

Mitigation for impacts to wildlife nursery sites shall be accomplished by adherence to Mitigation Measures BIO-A through BIO-L.

**Findings and Rationale**

For this significant impact to biological resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures BIO-M through BIO-P have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures BIO-M through BIO-P are applied within their jurisdictions.

Local jurisdictions retain land use authority and are able to impact biological resources as deemed necessary to accommodate regional growth. Local jurisdictions may find it necessary to convert vacant land containing biological resources to residential uses to accommodate their share of the Regional Housing Needs Assessment distribution.

Although mitigation measures BIO-M through BIO-P reduce the significant impact to the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites, the impact will remain significant and unavoidable because there is no assurance that these mitigation measures would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, while it is probable that all direct impacts to special status species are likely to be mitigated to a less than significant level, indirect impacts from noise, air pollution,
wildfire, spread of invasive species, and human presence are not completely controllable despite implementation of mitigation measures. Furthermore, while direct impacts from construction, such as road crossings and reduced corridor width, are directly mitigable through design modifications, the effect of human presence and behavioral response of various species to final corridor design, even after implementation of mitigation measures, is not completely controllable. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Biological Resources (EIR Section 5.2.4)**

**Significant Impacts**

Because cumulative biological resources impacts associated with impacts BIO-1, BIO-2 and BIO-3 throughout the southern California region and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental biological resources impacts are significant, the 2050 RTP/SCS incremental biological resources impacts are also cumulatively considerable.

**Mitigation (EIR Section 4.4.4)**

Implementation of mitigation measures BIO-A through BIO-P above would reduce project biological resources impacts associated with BIO-1, BIO-2, BIO-3 and BIO-4, though not to less than significant levels.

**Findings and Rationale**

For these significant cumulative impacts, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures BIO-A through BIO-P have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures BIO-Q and BIO-R are applied within their jurisdictions.

Although mitigation measures BIO-A through BIO-P reduce the significant biological impacts associated with impacts BIO-1, BIO-2, and BIO-3, the 2050 RTP/SCS incremental contribution to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that these mitigation measures would reduce impacts to all development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.
E. CULTURAL RESOURCES AND PALEONTOLOGY (EIR SECTION 4.5)

Cumulative Cultural Resources and Paleontology (EIR Section 5.2.5)

Significant Impacts

Because impacts of the 2050 RTP/SCS related to adverse changes to cultural resources and paleontological resources associated with impacts CULT-1 and PALEO-1 throughout southern California and northern Baja by 2020, 2035 and 2050 would be significant, the 2050 RTP/SCS contributes to a cumulatively significant impact.

Mitigation (EIR Section 4.5.5)

Implementation of mitigation measures CULT-A, CULT-B, CULT-C, CULT-D, CULT-E and CULT-F, and PALEO-A would reduce the 2050 RTP/SCS contribution to a cumulative impact though not to a less than significant level.

Findings and Rationale

For these significant cumulative impacts associated with CULT-1 and PALEO-1, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures CULT-A, CULT-B, CULT-C, CULT-D, CULT-E and CULT-F, and PALEO-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations should be adopted by those other agencies with responsibility and jurisdiction. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures CULT-A, CULT-B, CULT-C, CULT-D, CULT-E and CULT-F, and PALEO-A are applied within their jurisdictions.

The SANDAG Board of Directors finds that the contribution of the 2050 RTP/SCS to a significant cumulative cultural resources impact is cumulatively considerable. While mitigation measures CULT-A, CULT-B, CULT-C, CULT-D, CULT-E and CULT-F, and PALEO-A would reduce significant project-level cultural resources and paleontological resources impacts to less than significant, the more that land is converted to developed uses, the greater the potential for cumulative impacts to cultural resources. While these mitigation measures would reduce project level impacts associated with the implementation of the 2050 RTP/SCS, there is no assurance that they would reduce the project’s incremental contribution to significant cumulative impacts to less than cumulatively considerable levels. Therefore, the 2050 RTP/SCS incremental contribution to a significant cumulative impact to cultural and paleontological resources would remain cumulatively considerable post-mitigation.

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

MR-1 Result in the loss of availability of known mineral resources (2020, 2035, 2050)

Significant Impacts

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in land use changes and the construction of transportation network improvements, both of which would result in the loss of availability of known mineral resources.
Mitigation (EIR Section 4.7.5)

Implementation of mitigation measures MR-A and MR-B would reduce impacts, but not to a less than significant level.

**MR-A**
The 19 incorporated cities and the County of San Diego, when updating the Conservation Element of their General Plans, can and should identify locations with known mineral resources and adopt policies and objectives to conserve the land most suitable for mineral resource extraction from development of incompatible land uses. Local jurisdictions shall pay particular attention to lands with known aggregate supply sources, as identified in the 2011 San Diego Region Aggregate Supply Study, with the intention to manage the region’s aggregate resources during the lifespan of the 2050 RTP/SCS.

**MR-B**
During project-specific design and CEQA review of transportation facilities, SANDAG shall and other implementing agencies can and should minimize impacts on known mineral resources through the evaluation of alternate route alignments and transportation facilities that conserve the land most suitable for mineral resource extraction from development of transportation uses. SANDAG and other implementing agencies shall pay particular attention to lands with known aggregate supply sources, as identified in the 2011 San Diego Region Aggregate Supply Study, with the intention to manage the region’s aggregate resources during the lifespan of the 2050 RTP/SCS.

**Findings and Rationale**

For this significant impact to mineral resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures MR-A and MR-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures MR-A is applied within their jurisdictions.

Although mitigation measures MR-A and MR-B reduce the significant impact to mineral resources, it remain significant and unavoidable because there is no assurance that these mitigation measures would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, while it is possible that all direct impacts to mineral resources can be mitigated to a less than significant level, implementation of the 2050 RTP/SCS would decrease the availability of MRZ-2 lands, which are lands with known mineral resources. Mitigation measure MR-A would require local jurisdictions to identify policies and objectives in their General Plan updates to conserve the most suitable lands in MRZ-2 locations for mineral resource extraction. Mitigation measure MR-B would require SANDAG and implementing agencies to conserve the most suitable lands in MRZ-2 locations by evaluating alternative route alignments and locations for transportation facilities. However, not all of MRZ-2 lands would be conserved under mitigation measures MR-A and MR-B. Jurisdictions update their General Plans during the most suitable time for them to do so, which may be after some regional growth and land use change has already been implemented in MRZ-2 locations. Additionally,
alternative route alignments for transportation projects that best conserve lands in MRZ-2 locations may not be technically or financially feasible.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following additional mitigation measures and has determined that they are infeasible for the reasons described below:

The following mitigation measure to avoid or reduce impacts to the availability of mineral resources is considered infeasible:

• Local jurisdictions shall conserve all vacant or undeveloped lands with known mineral resources from the development of incompatible uses. These lands include all vacant or undeveloped lands designated as MRZ-2 locations or lands with potential aggregate supply sites.

This mitigation measure is considered infeasible because it would restrict future development in areas identified for increased growth under jurisdictions’ land use plans. Doing so would cause conflicts with existing land use plans and conflict with the region’s ability to manage growth in a sustainable manner, which is a project objective of the 2050 RTP/SCS. Restricting development of residential units or increasing density of residential development may cause the 2050 RTP/SCS to be out of compliance with implementing the RHNA allocation, a requirement mandated by state law, or impede implementation of a jurisdiction’s Housing Element. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Geology, Soils and Mineral Resources (EIR Section 5.2.7) – MR-1**

**Significant Impacts**

Because cumulative impacts associated with MR-1, loss of mineral resources, throughout the southern California and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts to geology, soils, and mineral resources are cumulatively considerable.

**Mitigation (EIR Section 4.7.5)**

Implementation of mitigation measures MR-A and MR-B above would reduce these impacts though not to less than significant levels.

**Findings**

For the significant cumulative impact associated with MR-1, loss of mineral resources, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures MR-A and MR-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. As described in these mitigation measures, some changes or alterations are within the responsibility of SANDAG and other changes or alterations are within the responsibility and jurisdiction of other public agencies and not SANDAG and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the
County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures MR-A and MR-B are applied within their jurisdictions.

Although mitigation measures MR-A and MR-B reduce the significant loss of mineral resources impact associated with impact MR-1, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that these mitigation measures would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

G. GREENHOUSE GAS EMISSIONS (EIR SECTION 4.8)

GHG-1 Increase GHG emissions. (2035 and 2050)

Significant Impacts

Regional growth/land use change GHG emissions in 2035 are expected to be greater than in 2010, while transportation-related GHG emissions are expected to be lower than in 2010. The total emissions expected in 2035 for both regional growth/land use change and transportation network improvements would be 30.18 MMT CO₂e, accounting for state measures and including construction-related emissions. Compared with the estimated 2010 emissions of 28.85 MMT CO₂e, this represents an increase over baseline conditions.

Regional growth/land use change and transportation-related GHG emissions in 2050 are expected to be greater than in 2010. The total emissions expected in 2050 would be 33.65 MMT CO₂e, accounting for state measures. Compared with the estimated 2010 emissions of 28.85 MMT CO₂e, this represents an increase over baseline conditions.

Mitigation (EIR Section 4.8.5)

Implementation of mitigation measures GHG-A, GHG-B and GHG-C would reduce impacts, but not to a less than significant level.

GHG-A  SANDAG shall update future Regional Comprehensive Plans and Regional Transportation Plans/Sustainable Community Plans to incorporate policies and measures that lead to reduced GHG emissions. Such policies and measures may be derived from the General Plans, local jurisdictions’ Climate Action Plans, and other adopted policies and plans of its member agencies that include GHG mitigation and adaptation measures or other sources.

GHG-B  San Diego region cities and the County government can and should adopt and implement Climate Actions Plans (also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions) that contain the following information:
a) Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within their respective jurisdictions;

b) Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;

c) Identify and analyze the GHG emissions resulting for specific actions or categories of actions anticipated within their respective jurisdictions;

d) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

e) Establish a mechanism to monitor the plan’s progress toward achieving that level and to require amendment if the plan is not achieving specified levels; and

f) Be adopted in a public process following environmental review.

CAPs should, when appropriate, incorporate planning and land use measures from the California Attorney General’s latest list of example policies to address climate change at both the plan and project level.

Specifically, at the plan level, land use plans should, when appropriate, incorporate planning and land use measures from the California Attorney General’s latest list of example policies to address climate change (http://ag.ca.gov/globalwarming/pdf/GP_policies.pdf), including, but not limited to policies from that web page such as:

- Smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, incentives and fees, zoning, and public-private partnerships
- Create transit, bicycle, and pedestrian connections through planning, funding, development requirements, incentives and regional cooperation, and create disincentives for auto use
- Energy and water-efficient buildings and landscaping through ordinances, development fees, incentives, project timing, prioritization, and other implementing tools

In addition, they should also incorporate, when appropriate, policies to encourage implementation of the Attorney General’s list of project specific mitigation measures available at the following web site: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf, including, but not limited to measures from the web page such as:

- Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation
- Build or fund a major transit stop within or near development
- Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers
• Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments

• Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.

They should also incorporate, when appropriate, planning and land use measures from additional resources listed by the California Attorney General at the following web page: http://ag.ca.gov/globalwarming/ceqa/resources.php.

SANDAG will assist local governments in preparing CAPs and other climate strategies through continued implementation of the SANDAG Climate Action Strategy and Energy Roadmap Program. The Climate Action Strategy provides a toolbox of land use, transportation, and related policy measures and investments that help implement the 2050 RTP/SCS through reducing GHG emissions. Policy measures also are identified for buildings and energy use, protecting transportation and energy infrastructure from climate impacts, and to help SANDAG and local jurisdictions reduce GHGs from their operations. Through the Energy Roadmap Program, SANDAG will continue to provide energy planning assistance to local governments to reduce local energy-related GHG emissions. SANDAG’s Climate Action Strategy can be found at: http://www.sandag.org/uploads/publicationid/publicationid_1481_10940.pdf.

In addition, CAPs should also incorporate analysis of climate change adaptation, in recognition of the likely and potential effects of climate change in the future regardless of the level of mitigation (San Diego Foundation Focus 2050 report) and in conjunction with Executive Order S-13-08, which seeks to enhance the State’s management of climate impacts including sea level rise, increased temperatures, shifting precipitation, and extreme weather events by facilitating the development of State’s first climate adaptation strategy.

GHG-C

SANDAG shall and implementing agencies can and should require Best Available Control Technology (BACT) during construction and operation of projects, including:

a) Solicit bids that include use of energy and fuel efficient fleets;
b) Solicit preference construction bids that use BACT;
c) Employ use of alternative fueled vehicles;
d) Use lighting systems that are energy efficient, such as LED technology;
e) Use CEQA Guidelines Appendix F, Energy Conservation, to create an energy conservation plan;
f) Streamline permitting process to infill, redevelopment, and energy-efficient projects;
g) Use an adopted emissions calculator to estimate construction-related emissions;
h) Use the minimum feasible amount of GHG-emitting construction materials that is feasible;
i) Use of cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;

j) Use of lighter-colored pavement where feasible;

k) Recycle construction debris to maximum extent feasible; and

l) Plant shade trees in or near construction projects where feasible.

Findings and Rationale

For the significant impact from increased GHG emissions, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures GHG-A, GHG-B and GHG-C have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure GHG-B is applied within their jurisdictions.

Although mitigation measures GHG-A, GHG-B and GHG-C reduce the significant impact from increased GHG emissions, the impact will remain significant and unavoidable because there is no assurance that these mitigation measures would reduce the impacts of all development and transportation network improvement projects to a less than significant level. For example, the projected increase in GHG emissions from baseline levels in 2035 and 2050 would primarily be due to changes in regional growth/land use. While the mitigation measures listed would encourage reduction in GHG emissions, they do not provide a mechanism that guarantees GHG emission reductions.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following additional mitigation measures and has determined they are infeasible for the reasons described below:

- Requiring all vehicles driven within the San Diego region to be zero-emission vehicles (ZEVs) or requiring all vehicles driven within the region to be powered by renewable energy was found to be infeasible due to the rate of turnover of vehicles on the roadway and limited number of ZEVs available. ARB has estimated that 50 percent of passenger cars are retired from service in 16.09 years and 18.63 years for light-duty trucks (ARB 2004). As of 2010, there were an estimated 26,905,700 vehicles in California (EMFAC 2007), with only 1.7 million ZEVs or low-emission vehicles (CPUC 2011). Similarly, conversion of existing vehicles to renewable energy fuel sources would likely result in greater demand than supply of renewable energy fuels.

- Requiring all future construction be net-zero energy use. While renewable energy is available and a feasible option for obtaining a portion of a project’s energy needs, it is infeasible for all projects to have net-zero emissions. For projects with consistent-energy requirements, such as hospitals or manufacturing centers, renewable energy may not fulfill operational standards. In addition, some energy-consuming services that are part of new
projects may not be feasible to change to renewable sources at the project level. For example, water is transported from long distances and a project may not be able to affect the power source for water transport. Similarly, wastewater is generally treated at a central location and operated independently from a project. For each project to treat its own wastewater with renewable energy sources may cause other environmental impacts.

- Requiring all future construction activity to include only retrofitted equipment. Some construction equipment may be retrofitted to significantly reduce the GHG emissions associated with construction activities; however, not all equipment has retrofit components and is therefore technologically infeasible at this time.

Implementation of the 2050 RTP/SCS would result in an increase in GHG emissions as a result of the growth in population, housing, and employment. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

Cumulative Greenhouse Gas Emissions (EIR Section 5.2.8)

Significant Impacts

Because cumulative impacts associated with GHG-1, an increase in GHG emissions throughout California by 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with an increase in greenhouse gas emissions are cumulatively considerable.

Mitigation (EIR Section 4.8.5)

Implementation of mitigation measures GHG-A, GHG-B and GHG-C above would reduce project-level impacts, though not to less than significant levels.

Findings

For the significant cumulative impact associated with GHG-1 from increased GHG emissions, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures GHG-A, GHG-B and GHG-C have been required in, or incorporated into the 2050 RTP/SCS to lessen this significant impact. As described in these mitigation measures, some changes or alterations are within the responsibility of SANDAG and other changes or alterations are within the responsibility and jurisdiction of other public agencies and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures GHG-A, GHG-B and GHG-C are applied within their jurisdictions.

Although mitigation measures GHG-A, GHG-B and GHG-C reduce the significant impact from increased GHG emissions associated with impact GHG-1, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that these mitigation measures would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR,
infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2035 and 2050.

H. HAZARDS AND HAZARDOUS MATERIALS (EIR SECTION 4.9)

HM8 - Expose people or structures to a significant risk of loss, injury, or death involving wildland fires (2020, 2035, 2050)

Significant Impacts

Given the relatively large amount of area within the San Diego region that is considered to be at high risk for wildland fires, additional growth and development forecasted in the 2050 RTP/SCS by 2020, 2035 and 2050 would expose additional people and structures to a significant risk of loss, injury, or death involving wildland fires; development would occur closer to WUI and Fire Hazard Severity zones. Adherence to the regulations described in Section 4.9.2 of the EIR would reduce impacts associated with an increase the exposure of additional people and structures to a significant risk of loss, injury, or death involving wildland fires, but not to a less than significant level.

Mitigation (EIR Section 4.9.5)

Implementation of mitigation measures HM-A and HM-B would reduce impacts, though not to a less than significant level.

HM-A  SANDAG shall and other implementing agencies can and should require the implementation of bank stabilization improvements and erosion control measures near transportation infrastructure, such as major highways and transit centers, after wildfires.

HM-B  SANDAG shall and other implementing agencies can and should consider additional wildfire risks caused by climate change in the design and environmental review of development projects and transportation network improvements implemented as part of the 2050 RTP/SCS. SANDAG shall and other implementing agencies can and should incorporate climate change adaptation measures into the project design, where feasible. Example adaptation measures could include, but are not limited to, such as designing buffer zones in areas within the WUI to reduce fuel adjacent to high population centers; ensuring sufficient emergency water supply for existing and new projects by working with water management agencies and plans; building and remodeling existing structures to be more fire resistant; minimizing exposure to and loss from fire hazards by avoiding, where feasible, development in high risk areas or designing developments in high-risk areas with ignition-resistant construction; and establishing fuel management strategies in high risk areas.

Findings and Rationale

For the significant impact associated with risk of wildland fires, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures HM-A and HM-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these
mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures HM-A and HM-B are applied within their jurisdictions.

Although mitigation measures HM-A and HM-B reduce the significant impact resulting from risk of wildland fires, the impact will remain significant and unavoidable because there is no assurance that these mitigation measures would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, vulnerability of the region to fire hazards and the indirect impacts fire events have on other environmental resource areas, such as infrastructure and sensitive biological resources, result in an impact than cannot be reduced to a less than significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following additional mitigation measures and has determined they are infeasible for the reasons described below:

- Local governments that have areas within the WUI could implement policies that would further limit the amount of future development or reduce densities of development in the areas of concern in order to reduce hazards associated with wildland fires.

This action would conflict with areas identified for increased growth under the current 2050 RTP/SCS growth forecast and with land use plans governing the area. The measure would also conflict with goals of providing sufficient housing stock and would not achieve one of the primary objectives of the 2050 RTP/SCS, which is to accommodate growth within the region over the next 40 years. Therefore, this measure is considered infeasible.

- Local governments that have areas within the WUI could require extensive fuel modification around existing and future development in wildland areas beyond the standards already set forth in plans or ordinances of local jurisdictions and other agencies.

This measure would substantially impact the environment by damaging biological resources, altering drainage patterns, causing erosion, and modifying the visual landscape. This would conflict with every jurisdiction’s local objectives to protect natural resources and habitat that uniquely define the character and ecological importance of an area. Therefore, this measure is considered infeasible.

- Local governments that have areas within the WUI could require the construction of a 30-foot-high fire-resistant barrier along WUI edges to act as a fire break.

This measure would result in substantial impacts to the existing aesthetic quality of natural open space areas character and division of existing communities, and it would impair wildlife movement. In addition, this action would require extensive acquisition of private property. Therefore, this measure is considered infeasible.
In the event of a wildland fire, damage would occur regardless of growth forecasted as part of the 2050 RTP/SCS. However, additional growth near and within WUI areas forecasted to occur by 2020, 2035, and 2050 as part of the 2050 RTP/SCS would place additional people and structures in areas at a significant risk. Because there are no feasible mitigation measures or alternatives to reduce impacts to less than significant levels, impacts associated with wildland fires remain significant and unavoidable.

Cumulative Hazards and Hazardous Materials (EIR Section 5.2.9) – HM-8

Significant Impacts

Because cumulative impacts associated with impact HM-8, wildland fires throughout California, by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with wildland fires are cumulatively considerable.

Mitigation (EIR Section 4.9.5)

Implementation of mitigation measures HM-B above would reduce project-level impacts, though not to less than significant levels.

Findings

For the cumulative impacts associated with impact HM-8, wildland fires, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure HM-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. As described in this mitigation measure, some changes or alterations are within the responsibility of SANDAG and other changes or alterations are within the responsibility and jurisdiction of other public agencies and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure HM-B is applied within their jurisdictions.

Although mitigation measure HM-B reduces the significant impact resulting from wildland fires associated with impact HM-8, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measure would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

I. LAND USE (EIR SECTION 4.11)

LU-1 (Impacts associated with regional growth/land use change) Regional growth/land use change associated with the 2050 RTP/SCS would directly or indirectly cause substantial
**deterioration of community cohesion or character, including substantial residential or business displacement (2050)**

**Significant Impacts**

By 2050, implementation of the 2050 RTP/SCS would result in significant impacts to community character due to urban and rural growth. Increased compact and sustainable development in existing cities may be beyond that anticipated and planned for within local plans and policies. The growth and expansion of rural residential uses into locations of undeveloped land may have substantial incompatibilities and conflicts with existing land use plans and policies. Therefore, impacts related to substantial conflicts with land use plans and policies due to high urban densities beyond that planned for by local jurisdictions and substantial expansion of rural development would be significant in 2050.

**Mitigation (EIR Section 4.11.5)**

Implementation of Mitigation Measure LU-B would reduce these impacts.

**LU-B**

SANDAG shall, and San Diego region cities and the County of San Diego can and should, review and reevaluate the SCS land use pattern in future years as growth occurs to consider whether continued increased density in urban areas or continued expansion of spaced rural residential use into existing undeveloped lands would be necessary. SANDAG shall revise the SCS land use pattern in future RTP updates to be consistent with the latest updates to local general plans, and to reduce the potential for long-term impacts on community character. In addition, in future updates of the Regional Comprehensive Plan (RCP), SANDAG will continue to coordinate with the local cities and the County of San Diego to update the Smart Growth Concept Map and identify areas of the region where additional growth could be accommodated to coincide with the increased investment in transit.

**Findings and Rationale**

For the significant impact associated with substantial deterioration of community cohesion or character, including substantial residential or business displacement, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure LU-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure LU-B is applied within their jurisdictions.

Although mitigation measure LU-B reduces the significant impact associated with deterioration of community cohesion and character, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of regional growth/land use change to a less than significant level. For example, due to variables such as changes in actual growth occurring in the region compared to the forecasted growth, potential changes made
in local plans, or other factors that may change in the next 40 years, there is no assurance that impacts will be reduced to less than significant.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following additional mitigation measures and has determined they are infeasible for the reasons described below:

- Implement economic disincentives such as increased taxes, development fees, and similar types of economically based actions to slow growth of both regional population and employment. The resulting slower growth would serve to reduce the need for increased urban densities, expansion into currently undeveloped areas, and the need for transportation network improvements and would reduce the associated land use impacts.

This measure was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. It would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as increased taxes and other economic disincentives would elevate costs associated with travel such as increased gas prices or higher transit fees. This measure would also be in direct opposition of the project objective to provide a transportation system that supports improvement of the region’s standard of living as it would place an added economic burden on residents and businesses in the San Diego region in addition to the already difficult economic situation. It would have a negative impact on the economic prosperity and viability of the region as a center for regional distribution and the goods movement industry.

Moreover, provisions in SB 375 require that each region plan for its anticipated population growth and that the level of growth be consistent with projections produced by the California Department of Finance (DOF), with no more than +/- 3 percent deviation of the local projection from the DOF projection. For the San Diego region, SANDAG and DOF projections are shown in Table 4.11-5.

<table>
<thead>
<tr>
<th>Year</th>
<th>SANDAG Projections</th>
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<td>2020</td>
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<td>2035</td>
<td>4,026,131</td>
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<tr>
<td>2050</td>
<td>4,384,867</td>
<td>4,508,728</td>
<td>-123,861</td>
<td>-2.7</td>
</tr>
</tbody>
</table>

The SANDAG projections are lower than those from DOF, but if the projections were to be any lower, the region would be outside the bounds of the +/- 3 percent deviation allowed. Additionally, SB 375 requires that the Regional Housing Need Assessment (RHNA) and SCS be consistent, meaning that the SCS land use pattern can accommodate the 8-year RHNA Determination. A slow growth strategy would likely not accommodate the RHNA, creating another inconsistency with the requirements of SB 375. Thus, even if growth-slowing policies would be feasible for the San Diego region, such policies would render the SCS out of compliance with SB 375.
Implement a regional growth strategy that promotes very restrictive zoning policies and land use regulations intended to limit future residential and economic growth within the San Diego Region. Limiting new residential growth would minimize potential land use conflicts resulting from high densities and expanded development areas as well as reduce the need for transportation network improvements.

Implementation of a highly restrictive regional growth strategy was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. Consideration of this measure found that these types of restrictions on future residential growth could result in increased interregional commuting, higher housing costs, and reduced economic success. It would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs, as the need for increased interregional travel would not be convenient for San Diego residents and would increase their commute costs. This measure would not achieve the objective to provide a transportation system that supports improvement of the region’s standard of living as more residents would have to commute out of the region for employment and reduced economic success would negatively impact the overall standard of living. Increasing the need to commute out of the region would not achieve the objective to provide an environmentally sustainable transportation system, as longer commutes require additional resources compared to short local commutes. As detailed in the discussion above and shown in Table 4.11-5, restricting and limiting growth as proposed by this measure would result in noncompliance with SB 375.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**LU-1 (Impacts associated with transportation network improvements) Directly or indirectly cause substantial deterioration of community cohesion or character, including substantial residential or business displacement (2020, 2035, 2050)**

**Significant Impacts**

In 2020, 2035 and 2050, transportation network improvements including roadway widening projects and Trolley line extensions have the potential to cause substantial deterioration of community cohesion or character, including substantial residential or business displacement.

**Mitigation (EIR Section 4.11.5)**

Implementation of Mitigation Measure LU-A would reduce these impacts.

**LU-A**

For transportation facility widening projects, Trolley line extensions, and double-tracking of the LOSSAN and SPRINTER corridors, SANDAG shall and other implementing agencies can and should implement feasible alignments, design options, and other design features that avoid or substantially reduce impacts on community character and cohesion, and avoid or substantially reduce conflicts with land use plans. To achieve this objective, SANDAG shall and implementing agencies should coordinate with cities and San Diego County early in the planning process for these facilities to identify potentially significant land use impacts and address them through the facility planning and design process.
Findings and Rationale

For the significant impact associated with substantial deterioration of community cohesion or character, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure LU-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure LU-A is applied within their jurisdictions.

Although mitigation measure LU-A reduces the significant impact associated with deterioration of community cohesion and character, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, due to variables such as changes in actual growth occurring in the region compared to the forecasted growth, potential changes made in local plans, or other factors that may change in the next 40 years, there is no assurance that impacts will be reduced to less than significant.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following additional mitigation measures and has determined they are infeasible for the reasons described below:

- Remove road widening, Trolley line extension, and rail double-tracking projects from the 2050 RTP/SCS. This would eliminate the significant land use compatibility impacts that were identified for these types of project in the above analysis.

This measure was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. Without these transportation network improvements as forecasted in the 2050 RTP/SCS, traffic operations would decrease and have negative regional implications on the ability of workers to efficiently commute, would burden the goods movement industry, and would limit efficient and reliable transit options. This result would be in direct conflict with the 2050 RTP/SCS objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs. Removal of these transportation improvements from the 2050 RTP/SCS would also hinder the ability of the project to meet the objective to provide a transportation system that supports improvement of the region’s standard of living as traffic conditions would worsen and transit options would not be expanded. In addition, regional economic prosperity would be limited as the goods movement industry would be negatively impacted by poor traffic conditions. The widespread negative traffic impacts that would result from lack of these necessary transportation improvements would also not meet the objective to provide a reliable transportation system that offers relatively consistent travel times by mode from day to day as transit service could not be increased and traffic operating conditions would worsen.
Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**LU-2 (Impacts associated with regional growth/land use changes) Conflict with or impede the implementation of existing land use plans, including general plans, specific plans, and applicable regional plans (2050)**

**Significant Impacts**

By 2050, implementation of the 2050 RTP/SCS would result in significant impacts associated with substantial conflict with or impediments to the implementation of existing land use plans, including general plans, specific plans, and applicable regional plans. Increased compact and sustainable development in existing cities may be beyond that anticipated and planned for within local plans and policies. The growth and expansion of rural residential uses into locations of undeveloped land may have substantial incompatibilities and conflicts with existing land use plans and policies. Therefore, impacts related to substantial conflicts with land use plans and policies due to high urban densities beyond that planned for by local jurisdictions and substantial expansion of rural development would be significant in 2050.

**Mitigation (EIR Section 4.11.5)**

Implementation of Mitigation Measure LU-B would reduce these impacts.

**LU-B** SANDAG shall, and San Diego region cities and the County of San Diego can and should, review and reevaluate the SCS land use pattern in future years as growth occurs to consider whether continued increased density in urban areas or continued expansion of spaced rural residential use into existing undeveloped lands would be necessary. SANDAG shall revise the SCS land use pattern in future RTP updates to be consistent with the latest updates to local general plans, and to reduce the potential for long-term impacts on community character. In addition, in future updates of the Regional Comprehensive Plan (RCP), SANDAG will continue to coordinate with the local cities and the County of San Diego to update the Smart Growth Concept Map and identify areas of the region where additional growth could be accommodated to coincide with the increased investment in transit.

**Findings and Rationale**

For the significant impact associated with substantial conflict with or impediments to the implementation of existing land use plans, including general plans, specific plans, and applicable regional plans, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure LU-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure LU-B is applied within their jurisdictions.

Although mitigation measure LU-B reduces the significant impact associated with substantial
conflict with or impediments to the implementation of existing land use plans, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of regional growth/land use change to a less than significant level. For example, due to variables such as changes in actual growth occurring in the region compared to the forecasted growth, potential changes made in local plans, or other factors that may change in the next 40 years, there is no assurance that impacts will be reduced to less than significant.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following additional mitigation measures and has determined they are infeasible for the reasons described below:

- Implement economic disincentives such as increased taxes, development fees, and similar types of economically based actions to slow growth of both regional population and employment. The resulting slower growth would serve to reduce the need for increased urban densities, expansion into currently undeveloped areas, and the need for transportation network improvements and would reduce the associated land use impacts.

This measure was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. It would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as increased taxes and other economic disincentives would elevate costs associated with travel such as increased gas prices or higher transit fees. This measure would also be in direct opposition of the project objective to provide a transportation system that supports improvement of the region’s standard of living as it would place an added economic burden on residents and businesses in the San Diego region in addition to the already difficult economic situation. It would have a negative impact on the economic prosperity and viability of the region as a center for regional distribution and the goods movement industry.

Moreover, provisions in SB 375 require that each region plan for its anticipated population growth and that the level of growth be consistent with projections produced by the California Department of Finance (DOF), with no more than +/- 3 percent deviation of the local projection from the DOF projection. For the San Diego region, SANDAG and DOF projections are shown in Table 4.11-5.

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The SANDAG projections are lower than those from DOF, but if the projections were to be any lower, the region would be outside the bounds of the +/- 3 percent deviation allowed. Additionally, SB 375 requires that the Regional Housing Need Assessment (RHNA) and SCS be consistent, meaning that the SCS land use pattern can accommodate the 8-year RHNA Determination. A slow growth strategy would likely not accommodate the RHNA,
creating another inconsistency with the requirements of SB 375. Thus, even if growthslowing policies would be feasible for the San Diego region, such policies would render the SCS out of compliance with SB 375.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**LU-2 (Impacts associated with transportation network improvements) Substantially conflict with or impede the implementation of existing land use plans, including general plans, specific plans, and applicable regional plans (2020, 2035, 2050)**

**Significant Impacts**

In 2020, 2035 and 2050, transportation network improvements including roadway widening projects and Trolley line extensions have the potential to be inconsistent with existing land use plans and policies.

**Mitigation (EIR Section 4.11.5)**

Implementation of Mitigation Measure LU-A would reduce these impacts.

**LU-A**

For transportation facility widening projects, Trolley line extensions, and double-tracking of the LOSSAN and SPRINTER corridors, SANDAG shall and other implementing agencies can and should implement feasible alignments, design options, and other design features that avoid or substantially reduce impacts on community character and cohesion, and avoid or substantially reduce conflicts with land use plans. To achieve this objective, SANDAG shall and implementing agencies should coordinate with cities and San Diego County early in the planning process for these facilities to identify potentially significant land use impacts and address them through the facility planning and design process.

**Findings and Rationale**

For the significant impact associated with conflicting with or impeding the implementation of plans, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure LU-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure LU-A is applied within their jurisdictions.

Although mitigation measure LU-A reduces the significant impact associated with conflicting with or impeding the implementation of plans, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all transportation network improvement projects to a less than significant level. For example, even though SANDAG and other implementing agencies attempt to apply feasible alignments, design options, and other design features associated with transportation network improvements that
avoid or substantially reduce impacts on community character and cohesion, project-specific conditions may still result in significant impacts and there is no assurance that such impacts will be reduced to less than significant.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:

- Remove road widening, Trolley line extension, and rail double-tracking projects from the 2050 RTP/SCS. This would eliminate the significant land use plan compatibility impacts that were identified for these types of project in the above analysis.

This measure was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. Without these transportation network improvements as forecasted in the 2050 RTP/SCS, traffic operations would decrease and have negative regional implications on the ability of workers to efficiently commute, would burden the goods movement industry, and would limit efficient and reliable transit options. This result would be in direct conflict with the 2050 RTP/SCS objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs. Removal of these transportation improvements from the 2050 RTP/SCS would also hinder the ability of the project to meet the objective to provide a transportation system that supports improvement of the region’s standard of living as traffic conditions would worsen and transit options would not be expanded. In addition, regional economic prosperity would be limited as the goods movement industry would be negatively impacted by poor traffic conditions. The widespread negative traffic impacts that would result from lack of these necessary transportation improvements would also not meet the objective to provide a reliable transportation system that offers relatively consistent travel times by mode from day to day as transit service could not be increased and traffic operating conditions would worsen.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Land Use (EIR Section 5.2.12)**

**Significant Impacts**

Because cumulative impacts associated with deterioration of community cohesion or character and conflicts or impediments to implementation of existing land use plans throughout the southern California and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with these issues are cumulatively considerable.

**Mitigation (EIR Section 4.11.5)**

Implementation of mitigation measures LU-A and LU-B above would reduce project impacts, though not to less than significant levels.
Findings and Rationale

For the significant cumulative impact associated with deterioration of community cohesion or character and conflicts or impediments to implementation of existing land use plans, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures LU-A and LU-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. As described in these mitigation measures, some changes or alterations are within the responsibility of SANDAG and other changes or alterations are within the responsibility and jurisdiction of other public agencies and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures LU-A and LU-B are applied within their jurisdictions.

Although mitigation measure LU-A and LU-B reduce the significant impact resulting from impacts to community cohesion or character and conflicts or impediments to implementation of existing land use plans associated with impacts LU-1 and LU-2, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measures would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

J. NOISE (EIR SECTION 4.12)

N-1 Expose persons to or generate noise levels in excess of standards established in local general plans or noise ordinances or applicable standards of other agencies (2020, 2035, 2050)

Significant Impacts

By 2020, 2035 and 2050, land use changes and transportation network improvements associated with growth forecasted in the 2050 RTP/SCS could locate noise-sensitive land uses in areas with noise levels in excess of local standards.

Mitigation (EIR Section 4.12.5)

Implementation of Mitigation Measures NOI-A, NOI-B and NOI-C would reduce impacts, although not to a less than significant level.

NOI-A SANDAG shall and other implementing agencies responsible for design and operation of individual projects that would generate operational source noise from infrastructure changes (such as transit stations, electrical substations, etc.) can and should implement the following design features, in locations that are near noise-sensitive receptors:
• New and expanded permanent noise sources, such as transit stations, will receive a full project-level environmental acoustical analysis to ensure that noise level increases are within acceptable limits.

• Noise reduction components such as buffer zones, barriers, site design, and grade separation will be implemented as determined by project-level analysis to ensure that noise level increases are within acceptable limits.

Local governments can and should use any land use design practices such as buffer zones, barriers, site design, and grade separation techniques to ensure that noise levels are reduced to the extent feasible.

NOI-B SANDAG shall and other implementing agencies responsible for design and operation of individual projects that would generate transportation noise (i.e., transportation network improvements and other changes in service or changes to routes or infrastructure related to rail or motor vehicles) can and should implement the following design features, in locations that are near noise-sensitive receptors:

• New and expanded transit corridors and features such as new rail tracks, double-tracking, interstate ramps, transit stations, and transit-only lanes will receive a full project-level environmental acoustical analysis to ensure that noise level increases are within acceptable limits.

• Noise reduction components such as buffer zones, barriers, corridor routing, site design, grade separation, and electric-powered vehicles will be implemented as determined by project-level analysis to ensure that noise level increases are within acceptable limits. An analysis of alternative designs for noise reduction components is also recommended.

• For all new at-grade rail crossings, Federal Rail Administration Quiet Zones requirements will be met and approved by both the FRA and the local government, as funding is available. Quiet Zones are at grade rail crossings that have met specific FRA safety criteria for reducing or eliminating the requirement for locomotives to blast their horns.

NOI-C SANDAG shall and other implementing agencies responsible for approval of or construction individual projects (both development projects and transportation network improvements) should implement the following mitigation measures to reduce noise levels generated by on-site construction-equipment:

• Where feasible, project construction and related activities shall occur during permitted hours in accordance with local jurisdiction regulations.

• Construction equipment will be properly maintained per manufacturers’ specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All impact tools will be shrouded or shielded and all intake and exhaust ports on power equipment will be muffled or shielded.

• Construction equipment will not be idled for extended periods of time in the vicinity of noise-sensitive receptors.

• Fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) will be located as far as possible from noise-sensitive receptors.
Provided that pile driving would be necessary for construction due to geological conditions, pile holes will be predrilled to the maximum feasible depth. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

Findings and Rationale

For the significant impact associated with noise levels in excess of standards, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures NOI-A, NOI-B and NOI-C have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures NOI-A, NOI-B and NOI-C are applied within their jurisdictions.

Although mitigation measures NOI-A, NOI-B and NOI-C reduce the significant impact associated with noise levels in excess of standards, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, the mitigation outlined provides a framework for future project design to ensure that the maximum noise abatement can be implemented at the project level. However, because of the variability of transportation noise sources and the high population density and proximity to major proposed noise sources in San Diego County, mitigation measures NOI-A, NOI-B, and NOI-C still cannot guarantee that all new and expanded routes, services, and roadways would meet varying local noise standards.

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

N-2 Expose persons to or generate vibration levels in excess of applicable standards (2020, 2035, 2050)

Significant Impacts

By 2020, construction and operation of development projects implementing 2050 RTP/SCS growth/land use changes would expose existing and new development to groundborne vibration impacts. Of the various potential impacts, only groundborne vibration levels associated with pile driving are considered significant. Similarly, pile driving or other foundation work associated with transportation network improvements would represent a significant impact on local vibration sensitive receivers. Also, vibrations from increased train activity would be significant at distances less than 250 feet.
By 2035 and 2050, construction and operation of development projects implementing 2050 RTP/SCS growth/land use changes would expose existing and new development to groundborne vibration impacts. Of the various potential impacts, only groundborne vibration levels associated with pile driving and foundation work are considered significant. Similarly, pile driving or other foundation work associated with transportation network improvements would represent a significant impact on local vibration sensitive receivers. Also, vibrations from increased train activity would be significant at distances less than 250 feet.

Mitigation (EIR Section 4.12.5)

In addition to implementation of mitigation measures NOI-A and NOI-B above, mitigation measure NOI-D would be required to reduce impacts, but not to a less than significant level.

NOI-D SANDAG shall and other implementing agencies can and should implement the following mitigation measures to reduce groundborne vibration and noise levels generated by on-site construction-equipment:

- When construction activity must take place within 45 feet of a sensitive receptor, smaller rubber-tired equipment will be used.
- If pile driving would be necessary for construction due to geological conditions within 290 feet of any sensitive receptor, pile holes will be predrilled to the maximum feasible depth. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground reducing pile diving vibration to a smaller area.

Findings and Rationale

For the significant impact associated with vibration levels in excess of applicable standards, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures NOI-A, NOI-B and NOI-D have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, transportation agencies other than SANDAG are responsible for implementing many local transportation network improvements and for ensuring mitigation measures NOI-A, NOI-B and NOI-D are applied to their projects.

Although mitigation measures NOI-A, NOI-B and NOI-D reduce the significant impact associated with noise levels in excess of standards, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, without detailed construction and operations data it cannot be ensured that the proposed mitigation would reduce all vibration impacts to a less than significant level. The mitigation outlined provides a framework for future construction activities to ensure that the maximum noise abatement can be implemented at the project level. However, because of the variability of vibration sources and the high population density and proximity to major proposed construction areas in San Diego County, mitigation measures NOI-A, NOI-B, and NOI-D still cannot guarantee that all construction and operation activities would meet applicable vibration standards.
The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**N-3 Cause a permanent substantial increase in ambient noise levels (2020, 2035, 2050)**

**Significant Impacts**

By 2020, land use changes associated with growth forecasted in the 2050 RTP/SCS could locate noise-sensitive land uses in areas where noise levels could increase substantial amounts above existing conditions. Transportation network improvements would generally not substantially increase noise levels over the existing condition, but some improvements could increase ambient noise levels by 5 or more dBA from the movement of traffic closer to receivers or development of new facilities where none currently exist.

By 2035 and 2050, the increase in population, housing, and employment development would result in substantial noise level increases of 5 dBA or more for both land use changes and transportation network improvements. While compliance with existing policies and regulations would limit noise levels between land uses in the SANDAG region, such compliance cannot guarantee that all future project-level impacts would be avoided or reduced below a significant level. At the regional scale, the noise impacts of new highways, highway widening, new HOV/managed lanes, new transit corridors, and increased activity along existing transit corridors are generally expected to result in a significant permanent increase in noise levels at noise-sensitive receptors in proximity to major transportation corridors.

**Mitigation (EIR Section 4.12.5)**

Implementation of Mitigation Measures NOI-A NOI-B, and NOI-C above would be required to reduce these impacts, but not to a less than significant level.

**Findings and Rationale**

For the significant impact associated with increase in ambient noise levels, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures NOI-A, NOI-B and NOI-C have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures NOI-A, NOI-B and NOI-C are applied within their jurisdictions.

Although mitigation measures NOI-A, NOI-B and NOI-C reduce the significant impact associated with increase in noise levels, the impact will remain significant and unavoidable because there is no assurance that these mitigation measures would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, without detailed operational data it cannot be ensured that the proposed mitigation would reduce all
impacts to a less than significant level. The mitigation outlined provides a framework for future project design to ensure that the maximum noise abatement can be implemented at the project level. However, because of the variability of transportation noise sources and the high population density and proximity to major proposed noise sources in San Diego County, Mitigation Measures NOI-A, NOI-B, and NOI-C still cannot guarantee that all new and expanded routes, services, and roadways would meet varying local noise standards.

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

**N-4 Cause a substantial temporary or periodic increase in ambient noise levels (2020, 2035, 2050)**

**Significant Impacts**

By 2020, 2035 and 2050, construction of development projects implementing 2050 RTP/SCS growth/land use changes, and construction of transportation network improvements, would likely expose sensitive receptors to temporary increases in ambient noise levels exceeding 10 dBA above ambient noise levels.

**Mitigation (EIR Section 4.12.5)**

Implementation of Mitigation NOI-C above would be required to reduce these impacts but not to less than significant levels.

**Findings and Rationale**

For the significant impact associated with a temporary or periodic increase in ambient noise levels, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure NOI-C have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in these mitigation measures are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure NOI-C is applied within their jurisdictions.

Although mitigation measure NOI-C reduces the significant impact associated with noise levels in excess of standards, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level. For example, without detailed construction data it cannot be ensured that the proposed mitigation would reduce all impacts to a less than significant level. The mitigation outlined provides a framework for future construction activities to ensure that the maximum noise abatement can be implemented at the project level. However, because of the variability of construction noise sources and the high population density and proximity to major proposed construction areas in San Diego County,
Mitigation Measure NOI-C still cannot guarantee that all construction actions would meet varying local noise standards.

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

**Cumulative Noise (EIR Section 5.2.12)**

**Significant Impacts**

Because cumulative impacts associated with increasing noise throughout the San Diego region and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with increasing noise are cumulatively considerable.

**Mitigation (EIR Section 4.12.5)**

Implementation of mitigation measures NOI-A NOI-B, NOI-C and NOI-D above would reduce project impacts though not to less than significant levels.

**Findings**

For the significant cumulative impact associated with increasing noise, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures NOI-A, NOI-B, NOI-C, and NOI-D have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. As described in these mitigation measures, some changes or alterations are within the responsibility of SANDAG and other changes or alterations are within the responsibility and jurisdiction of other public agencies and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures NOI-A, NOI-B, and NOI-C are applied within their jurisdictions.

Although mitigation measure NOI-A, NOI-B, NOI-C, and NOI-D reduce the significant impact resulting from increasing noise associated with impacts NOI-1, NOI-2, NOI-3 and NOI-4, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that these mitigation measures would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.
K. POPULATION AND HOUSING (EIR SECTION 4.13)

**PH-1 Induce substantial population growth**

**Significant Impacts**

In 2020, 2035 and 2050, the proposed 2050 RTP/SCS would induce substantial population growth through policies, strategies, land use changes and transportation improvements.

**Mitigation (EIR Section 4.13.5)**

No feasible mitigation has been identified for this significant impact.

**Findings and Rationale**

By 2020, 2035, and 2050, implementation of the 2050 RTP/SCS, including regional growth and land use changes and transportation network improvements, would induce substantial population growth. There are no feasible mitigation measures at the program level for this impact. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:

- A moratorium on building permits, for example, would restrict housing and business development, which would cause potential residents or companies to locate outside of the San Diego region. However, a regionwide moratorium would be difficult if not impossible to implement for economic, political, and legal reasons, especially over an extended period of time. A moratorium would also impede the ability of the region to implement the RHNA. Additionally, a moratorium would cause potential residents to reside in neighboring regions and commute into the region, which would increase GHG emissions and counter sustainability goals included in the 2050 RTP/SCS. A regionwide restriction on public services and utilities would also serve to limit population growth but would be difficult, if not completely infeasible, to implement for the reasons described above.

Additionally, failing to accommodate the forecasted population growth would be inconsistent with a fundamental objective of the 2050 RTP/SCS. As discussed in Section 4.13.2, Government Code Section 65080(b)(2)(B)(ii) requires that the RTP/SCS must house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan. A building moratorium would impede the ability of local jurisdictions to construct a sufficient housing supply for the forecasted population growth.

Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable.

**PH-2 Displace existing housing or businesses (2020, 2035, 2050)**

**Significant Impacts**

By 2020, 2035 and 2050, the 2050 RTP/SCS land use changes and transportation network improvements would displace a substantial number of residences or businesses.
Mitigation (EIR Section 4.13.5)

The following mitigation measure is intended to reduce impacts related to housing and business displacement. This mitigation measure is general and programmatic in nature, and would be refined in project-specific CEQA documents.

**PH-A**  
For transportation network improvements, SANDAG shall and other implementing agencies can and should develop design strategies for application at the project level to avoid or reduce the temporary or permanent acquisition of residential and nonresidential property. For projects with the potential to displace homes and/or businesses, SANDAG shall and other implementing agencies can and should evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. If an alternate route would use existing rights-of-way or avoid or reduce the number of homes or businesses displaced, the route should be considered as a project alternative and studied for feasibility.

Findings and Rationale

For the significant impact associated with housing and business displacement, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure PH-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, transportation agencies other than SANDAG are responsible for implementing many local transportation network improvements and for ensuring mitigation measure PH-A is applied to their projects.

Although mitigation measure PH-A reduces the significant impact associated with housing and business displacement, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level. In some cases, an alternative route that avoids or reduces displacement may be physically or economically infeasible. In other cases, the alternative route may cause a greater number of impacts in other issue areas, such as aesthetics or biological resources, or be considered unsafe due to geologic hazards. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:

- For redevelopment projects that would displace existing housing or businesses, design strategies shall be developed for application at the project level to avoid or reduce the temporary or permanent acquisition of residential and nonresidential property. For projects with the potential to displace homes and/or businesses, project implementation agencies shall conduct efforts to keep the structures and uses of existing homes or businesses whenever feasible.

This mitigation measure would be infeasible because it would restrict future development in areas identified for increased growth under jurisdictions’ land use plans. Doing so would cause conflicts with existing land use plans and conflict with the region’s ability to manage growth in a sustainable
manner, which is a project objective of the 2050 RTP/SCS. In addition, restricting development of residential units or the increase of residential density may cause the 2050 RTP/SCS to be out of compliance with implementing the RHNA allocation, a requirement mandated by state law, or impede implementation of a jurisdiction’s Housing Element.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Population and Housing (EIR Section 5.2.13)**

**Significant Impacts**

Because cumulative impacts associated with population growth and displacement of existing housing or businesses throughout the southern California region and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with population growth and displacement are cumulatively considerable.

**Mitigation (EIR Section 4.13.5)**

Implementation of mitigation measure PH-A above would reduce these project impacts, though not to less than significant levels.

**Findings**

For the cumulative impact associated with population growth and displacement of existing housing or businesses, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure PH-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. As described in these mitigation measures, some changes or alterations are within the responsibility of SANDAG and other changes or alterations are within the responsibility and jurisdiction of other public agencies and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure PH-A is applied within their jurisdictions.

Although mitigation measure PH-A reduces the significant impact resulting from population growth and displacement of existing housing or businesses associated with impacts PH-1 and PH-2, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measure would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.
L. PUBLIC SERVICES, UTILITIES AND ENERGY (EIR SECTION 4.14)

US-3 (Impact associated with regional growth/land use changes) Result in a region served by landfills with insufficient permitted capacity to accommodate the project’s solid waste disposal needs (2020, 2035, 2050)

Significant Impacts

If no new landfills are permitted by 2020, 2035 and 2050, regional growth/land use changes would result in a region that would be served by landfills with insufficient permitted capacity to meet the solid waste disposal needs of regional growth forecasted by the 2050 RTP/SCS.

Mitigation (EIR Section 4.14.5)

Implementation of Mitigation Measure US-D would reduce impacts associated with solid waste disposal.

US-D SANDAG shall and San Diego region cities, and the County of San Diego can and should support the San Diego region's implementation of (1) the IWMA through identification of the need for new landfills and possible sites through the preparation of the CIWMP, and regular updates to the Countywide Siting Element every 5 years; and (2) solid waste recycling, composting, and other waste reduction programs.

Findings and Rationale

For the significant impact associated with insufficient landfill capacity, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure US-D have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain solid waste planning is controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure US-D is applied within their jurisdictions.

Although mitigation measure US-D reduces the significant impact associated with insufficient landfill capacity, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all land use development projects to a less than significant level. The capacity of existing landfills is limited, and the 2050 RTP/SCS would increase the total amount of solid waste generated. Increasing the total amount of solid waste that requires disposal in landfills would cause landfills to reach maximum permitted capacity quicker. The capacity of existing landfills is limited, and in the years 2020, 2035, and 2050, sufficient permitted capacity to serve the region is not anticipated.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:
- Require all proposed projects to obtain written verification of sufficient landfill capacity to meet projected solid waste disposal needs of the project for the next 20 years.

This mitigation measure would be infeasible because existing landfill facilities are not projected to have sufficient capacity to meet the solid waste disposal needs in the years 2020, 2035, or 2050. New development would be unable to obtain verification of adequate landfill capacity and regional growth would be prohibited. Therefore, this mitigation measure would cause conflicts with existing land use plans and impede the region’s ability to manage growth in a sustainable manner, which is a project objective of the 2050 RTP/SCS. Restricting development of residential units or increasing density of residential development may cause the 2050 RTP/SCS to be out of compliance with implementing the RHNA allocation, a requirement mandated by state law, or impede implementation of a jurisdiction’s Housing Element.

- Require any proposed project that is expected to result in an increase in solid waste disposal demand to construct a solid waste disposal facility, concurrent with development, to meet the projected solid waste needs of the project.

This mitigation measure would be infeasible because it places the burden of developing solid waste disposal facilities on the project proponent and would require permits from local and state agencies. Furthermore, this mitigation measure would result in environmental impacts from the construction of multiple solid waste facilities throughout the region. Implementation of this mitigation measure would conflict with the project objective of the 2050 RTP/SCS to promote sustainable development patterns and reduce the need for additional regional infrastructure.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Public Services, Utilities and Energy (EIR Section 5.2.14)**

**Significant Impacts**

Because cumulative impacts associated with impact US-3, insufficient solid waste disposal capacity throughout the southern California region and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with this issue are cumulatively considerable.

**Mitigation (EIR Section 4.14.5)**

Implementation of mitigation measure US-D above would reduce these project impacts, though not to less than significant levels.

**Findings and Rationale**

For the significant cumulative impact associated with Impact US-3, insufficient solid waste disposal capacity, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure US-D have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. As described in these mitigation measures, some changes or alterations are within the responsibility of SANDAG and other changes or alterations are within the responsibility and jurisdiction of other public agencies and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the
County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure US-D is applied within their jurisdictions.

Although mitigation measure US-D reduces the significant impact resulting from insufficient solid waste disposal capacity associated with impact US-3, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measure would reduce impacts of all land use development projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

M. RECREATION (EIR SECTION 4.15)

REC-1 (Impact associated with land use changes) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated (2020, 2035, 2050)

Significant Impacts

By 2020, 2035 and 2050, implementation of the 2050 RTP/SCS would result in growth and land use changes that would cause a reduction in parkland per capita, which would cause substantial deterioration of existing parks and recreation facilities. Due to growth and land use changes, implementation of the 2050 RTP/SCS would result in substantial deterioration of existing parks and recreation facilities.

Mitigation (EIR Section 4.15.5)

Implementation of Mitigation Measure REC-A would reduce impacts, although not to a less-than-significant level. This mitigation measure is general and programmatic, and would be refined in project-specific CEQA documents.

REC-A The 19 incorporated cities, the County of San Diego, and special districts with responsibility for the construction of new recreation facilities or the expansion of existing facilities can and should acquire parkland concurrent with forecasted development through the Quimby Act and other means described in Section 4.15.2, and use local plans, ordinances, and other means to acquire parkland and recreation facilities as their populations increase to adequately meet projected needs.

Findings and Rationale

For the significant impact associated with substantial physical deterioration of recreation facilities, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure REC-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that the changes and alterations described in this mitigation measure are within responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the
2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure REC-A is applied within their jurisdictions.

Although mitigation measure REC-A reduces the significant impact associated with insufficient landfill capacity, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development projects to a less than significant level. For example, local jurisdictions with inadequate parkland per capita would use state regulations and local plans and ordinances to acquire land and funding for the provision of new parkland as population growth occurs. However, it cannot be assured that adequate resources would be available to acquire the amount of parkland needed to meet forecasted population growth.

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

**Cumulative Recreation (EIR Section 5.2.15) – REC-1**

**Significant Impacts**

Because cumulative impacts associated with use of existing parks resulting in substantial deterioration throughout the southern California region and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with this issue are cumulatively considerable.

**Mitigation (EIR Section 4.15.5)**

Implementation of mitigation measure REC-A above would reduce these project impacts, though not to less than significant levels.

**Findings and Rationale**

For the significant cumulative impact associated with use of existing parks resulting in substantial deterioration, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure REC-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. As described in these mitigation measures, changes or alterations are within the responsibility and jurisdiction of public agencies other than SANDAG and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure REC-A is applied within their jurisdictions.

Although mitigation measure REC-A reduces the significant impact resulting from use of existing parks resulting in substantial deterioration associated with impact REC-1, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measure would reduce impacts
of all land use development projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

Cumulative Recreation (EIR Section 5.2.15) – REC-2

Significant Impacts

Because cumulative impacts associated with the construction or expansion of recreational facilities (Impact REC-2) throughout the southern California region and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with this issue are cumulatively considerable.

Mitigation (EIR Section 4.15.5)

Implementation of mitigation measure REC-B above would reduce these project impacts though not to a less than significant level.

Findings and Rationale

For these significant cumulative impacts associated with the construction or expansion of recreational facilities, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures REC-B have been required in, or incorporated into, the 2050 RTP/SCS to reduce this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures REC-B are applied within their jurisdictions.

Although mitigation measure REC-B reduces construction-related impacts to the expansion or construction of new recreation facilities, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that mitigation measure REC-B would reduce the cumulative impacts of all land use development projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

N. TRANSPORTATION AND TRAFFIC (EIR SECTION 4.16)

T-3 Substantially decreases the percentage of non-work-related trips accessible within 15 minutes (2050)
**Significant Impacts**

The SANDAG Board of Directors finds that in 2050, implementation of both the regional growth/land use changes and transportation improvements results in an overall net decrease of 4 percent of non-work-related trips accessible within 15 minutes for all transportation modes (i.e., driving alone, carpooling, transit), as compared to 2010. Because the overall net change would be a 4 percent decrease, a significant impact related to accessibility of non-work-related trips in 15 minutes would result in year 2050.

**Mitigation (EIR Section 4.16.5)**

Implementation of mitigation measure T-A would reduce these impacts.

**T-A**

SANDAG, working with local jurisdictions and other transportation planning agencies, including Caltrans, shall reevaluate regional travel times, land use changes, and regional growth during the development of each RTP/SCS, occurring every four years. When feasible, SANDAG shall in future RTP/SCSs modify the timing and priority of transportation network improvements to be consistent with available funding programs to most quickly implement those improvements that would reduce impacts T-3 and T-4 to less than significant levels.

**Findings and Rationale**

For the significant impact associated with a decrease the percentage of non-work-related trips accessible within 15 minutes, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure T-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact.

Although mitigation measure T-A reduces the significant impact associated with a decrease the percentage of non-work-related trips accessible within 15 minutes, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR infeasible.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:

- **Require SANDAG’s member agencies to increase congestion pricing by elevating parking fees.** The increased parking fees would serve as an economic deterrent for commuters driving alone. This could reduce single-driver trips and help avoid substantial increases in work trip travel time and peak period congestion.

This measure was considered infeasible due to the social considerations, that is, the inability to implement this measure adequately and equally throughout all agencies and because of economic
consideration of the added economic burden that would be placed on workers in the San Diego region, in addition to the already difficult economic situation. Also, this measure would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as the increased parking fee may adversely impact the travel costs of drivers who do not have access to convenient transit options.

- Impose increased taxes on transportation fuel as an economic deterrent to auto and truck travel. This could reduce single-driver trips and avoid substantial increases in work trip travel time and peak period congestion.

This measure was considered infeasible because of the inability of SANDAG to adequately require the implementation of this measure across the region with the necessary authority to impose such taxes. In addition, this measure would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as increased transportation fuel taxes would elevate costs associated with travel, including transit. Also, the measure would not achieve the objective to provide a transportation system that supports improvement of the region’s standard of living due to the adverse impact it would have on the economic prosperity and viability of the region as a center for regional distribution and the goods movement industry due to higher transportation fuel prices.

- Implement a regional growth strategy that includes very restrictive zoning policies and land use regulations intended to limit future residential, employment, and economic growth within the San Diego Region. Limiting new residential and job growth would minimize additional traffic volumes, and slowing economic growth would reduce commuter trips as well as create less goods movement traffic throughout the region.

Implementation of a highly restrictive regional growth strategy was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. Consideration of this measure found that these types of restrictions on future residential and employment growth could result in increased interregional commuting, higher housing costs, and reduced economic success. As fully detailed in 4.11, Land Use, this measure would not achieve the fundamental objectives to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs; provide a transportation system that supports improvement of the region’s standard of living; or provide an environmentally sustainable transportation system as longer commutes require additional resources compared to short local commutes. As detailed in the Land Use section, Table 4.11-5, restricting and limiting growth as proposed by this measure would result in noncompliance with SB 375.

- Implement the unconstrained network of major capital improvements as detailed in Appendix A of the 2050 RTP/SCS. This would increase the investment in transportation infrastructure, transit services, transportation programs, and multi-modal infrastructure. The increased infrastructure and service would improve accessibility to convenient transportation options and likely reduce identified transportation impacts.

Construction of additional infrastructure and service improvements through implementation of the unconstrained transportation network was considered infeasible because it is not economically possible to fund the additional improvements. As stated in 23 USC Section 134(g)(2)(B), metropolitan area long-range transportation plans must contain a financial plan. Each transportation plan must include a financial plan that demonstrates how the adopted long-range transportation plan can be implemented, indicate reasonably expected resources from public and private sources to carry out the plan, and recommend any additional financing strategies for
needed projects and programs. Additionally, 23 CFR Section 450.322 (b)(11) requires that long-range transportation plans include a financial plan that demonstrates the consistency of proposed transportation investments with available and projected sources of revenue. Due to current fiscal constraints, it is not possible to demonstrate funding availability to implement the unconstrained transportation network. Though additional infrastructure and service improvements would likely reduce transportation impacts, this measure is economically infeasible and could not meet the requirements of the regulations cited above.

- Implement an intensified land use scenario that increases employment and residential land use densities along transportation corridors. Intensified distribution of residential use and employment centers in the immediate vicinity of transportation corridors would improve access for workers to travel to their places of work and could reduce identified transportation impacts.

The implementation of an intensive land use scenario around transportation corridors was considered infeasible for three reasons. First, SANDAG does not have the legal authority to implement this scenario. Land use inputs for the growth scenario of the 2050 RTP/SCS came directly from existing and proposed local government land use plans and policies. SANDAG does not have the legal authority to alter or modify those land use plans, which direct growth within individual jurisdictions.

Second, the intensified land use scenario conflicts with the existing and proposed local government land use plans and policies of a number of local governments. Therefore, it is unlikely that local governments would voluntarily change their land use plans and policies to implement the scenario. Additionally, any increased land use intensities would have to be countered with residential and employment reductions elsewhere and would likely involve multiple jurisdictions making simultaneous actions to accommodate this shift in growth in their individual land use plans and policies.

Third, an RTP’s forecasted growth pattern must be based on the latest available estimates and assumptions for population, land use, travel, employment, congestion, and economic activity (CFR Title 23 Section 450.322(e)). As discussed above, the intensified land use along transportation corridors scenario would conflict with that requirement and would not represent the latest available estimates and assumptions for land use and related factors.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**T-4 Substantially increase the congested vehicle miles travelled (LOS E and F) in peak periods (3 percent or greater) (2050)**

**Significant Impacts**

In 2050, implementation of both the land use changes and transportation improvements results in an increase in the percentage of VMT in congested conditions of 6.1 percent as compared to 2010. An increase of 3 percent or greater in those trips is considered substantial. Because there would be an increase of greater than 3 percent as compared to 2010, a significant impact related to total VMT in congested conditions during peak periods would result in 2050.
Mitigation (EIR Section 4.16. 5)

Implementation of mitigation measure T-A would reduce these impacts.

Findings and Rationale

For the significant impact associated with an increase the congested vehicle miles travelled (LOS E and F) in peak periods, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure T-A have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact.

Although mitigation measure T-A reduces the significant impact associated with an increase in congested vehicle miles travelled (LOS E and F) in peak periods, the impact will remain significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:

- Require SANDAG’s member agencies to increase congestion pricing by elevating parking fees. The increased parking fees would serve as an economic deterrent for commuters driving alone. This could reduce single-driver trips and help avoid substantial increases in work trip travel time and peak period congestion.

  This measure was considered infeasible due to the social considerations, that is, the inability to implement this measure adequately and equally throughout all agencies and because of economic consideration of the added economic burden that would be placed on workers in the San Diego region, in addition to the already difficult economic situation. Also, this measure would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as the increased parking fee may adversely impact the travel costs of drivers who do not have access to convenient transit options.

- Impose increased taxes on transportation fuel as an economic deterrent to auto and truck travel. This could reduce single-driver trips and avoid substantial increases in work trip travel time and peak period congestion.

  This measure was considered infeasible because of the inability of SANDAG to adequately require the implementation of this measure across the region with the necessary authority to impose such taxes. In addition, this measure would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as increased transportation fuel taxes would elevate costs associated with travel, including transit. Also, the measure would not achieve the objective to provide a transportation system that supports improvement of the region’s standard of living due to the adverse impact it would have on the economic prosperity and viability of the region as a center for regional distribution and the goods movement industry due to higher transportation fuel prices.
• Implement a regional growth strategy that includes very restrictive zoning policies and land use regulations intended to limit future residential, employment, and economic growth within the San Diego Region. Limiting new residential and job growth would minimize additional traffic volumes, and slowing economic growth would reduce commuter trips as well as create less goods movement traffic throughout the region.

Implementation of a highly restrictive regional growth strategy was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. Consideration of this measure found that these types of restrictions on future residential and employment growth could result in increased interregional commuting, higher housing costs, and reduced economic success. As fully detailed in 4.11, Land Use, this measure would not achieve the fundamental objectives to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs; provide a transportation system that supports improvement of the region’s standard of living; or provide an environmentally sustainable transportation system as longer commutes require additional resources compared to short local commutes. As detailed in the Land Use section, Table 4.11-5, restricting and limiting growth as proposed by this measure would result in noncompliance with SB 375.

• Implement the unconstrained network of major capital improvements as detailed in Appendix A of the 2050 RTP/SCS. This would increase the investment in transportation infrastructure, transit services, transportation programs, and multi-modal infrastructure. The increased infrastructure and service would improve accessibility to convenient transportation options and likely reduce identified transportation impacts.

Construction of additional infrastructure and service improvements through implementation of the unconstrained transportation network was considered infeasible because it is not economically possible to fund the additional improvements. As stated in 23 USC Section 134(g)(2)(B), metropolitan area long-range transportation plans must contain a financial plan. Each transportation plan must include a financial plan that demonstrates how the adopted long-range transportation plan can be implemented, indicate reasonably expected resources from public and private sources to carry out the plan, and recommend any additional financing strategies for needed projects and programs. Additionally, 23 CFR Section 450.322 (b)(11) requires that long-range transportation plans include a financial plan that demonstrates the consistency of proposed transportation investments with available and projected sources of revenue. Due to current fiscal constraints, it is not possible to demonstrate funding availability to implement the unconstrained transportation network. Though additional infrastructure and service improvements would likely reduce transportation impacts, this measure is economically infeasible and could not meet the requirements of the regulations cited above.

• Implement an intensified land use scenario that increases employment and residential land use densities along transportation corridors. Intensified distribution of residential use and employment centers in the immediate vicinity of transportation corridors would improve access for workers to travel to their places of work and could reduce identified transportation impacts.

The implementation of an intensive land use scenario around transportation corridors was considered infeasible for three reasons. First, SANDAG does not have the legal authority to implement this scenario. Land use inputs for the growth scenario of the 2050 RTP/SCS came directly from existing and proposed local government land use plans and policies. SANDAG does not have the legal authority to alter or modify those land use plans, which direct growth within individual jurisdictions.
Second, the intensified land use scenario conflicts with the existing and proposed local government land use plans and policies of a number of local governments. Therefore, it is unlikely that local governments would voluntarily change their land use plans and policies to implement the scenario. Additionally, any increased land use intensities would have to be countered with residential and employment reductions elsewhere and would likely involve multiple jurisdictions making simultaneous actions to accommodate this shift in growth in their individual land use plans and policies.

Third, an RTP’s forecasted growth pattern must be based on the latest available estimates and assumptions for population, land use, travel, employment, congestion, and economic activity (CFR Title 23 Section 450.322(e)). As discussed above, the intensified land use along transportation corridors scenario would conflict with that requirement and would not represent the latest available estimates and assumptions for land use and related factors.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Transportation and Traffic (EIR Section 5.2.16)**

**Significant Impacts**

Because cumulative impacts associated with non-work trip travel time (T-3) and traffic congestion (T-4), throughout the southern California region and northern Baja region by 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with this issue are cumulatively considerable.

**Mitigation (EIR Section 4.16.5)**

Implementation of mitigation measure T-A above would reduce project impacts, though not to less than significant levels.

**Findings**

For the significant cumulative impacts associated with non-work trip travel time (T-3) and traffic congestion (T-4), the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure T-A have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. As described in this mitigation measure, changes or alterations are within the responsibility and jurisdiction of public agencies other than SANDAG and can and should be adopted by those other agencies. For example, since certain growth/land use changes and transportation network improvements identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure T-A is applied within their jurisdictions.

Although mitigation measure T-A reduces the significant impact resulting associated with work trip and non-work trip travel time and traffic congestion, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measure would reduce impacts of all land use development and transportation network improvement projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make
additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2050.

O. WATER SUPPLY (EIR SECTION 4.17)

**WS-1 (Impact associated with regional growth/land use change) Increase the use of existing available water supplies or water treatment and other facilities such that water supplies or facilities would be inadequate to serve existing and projected future demand (2020, 2035, 2050)**

**Significant Impacts**

Implementation of the 2050 RTP/SCS would result in significant regional growth/land use change impacts associated with impact WS-1, the provision of regional water supplies and availability of water treatment facilities in 2035 and 2050, and localized significant impacts in 2020 in the Borrego Valley.

**Mitigation (EIR Section 4.17.5)**

Implementation of mitigation measures WS-A and WS-B would reduce these impacts, though not to a less than significant level.

**WS-A:** Local governments can and should implement all feasible water conservation measures, including, but not limited to, those measures and policies regarding water efficiency, conservation, capture, and reuse identified by water suppliers and in local government general plans during the CEQA review process for individual development projects. For example, water conservation measures could include:

- Educating the public regarding water conservation, greywater use, and water storage and capture strategies.
- Requiring new construction and major renovations of all residential and nonresidential developments to meet the following standards:
  - Achieve a reduction of water use to be 40 percent less than baseline for buildings as calculated by the Energy Policy Act of 1992.
  - Reduce water consumption for outdoor landscape irrigation, consistent with the most recent local government policies.
- Comply with all prevailing state laws and local government regulations regarding indoor and outdoor water conservation and efficiency in new construction.
  - Installation of drought-tolerant landscaping, drip irrigation systems for landscaping where appropriate, and low-flow fixtures in bathrooms and kitchens.
  - Require efficient irrigation systems and encourage the use of native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping.
Maximize stormwater filtration and/or infiltration in areas that are not subject
to high groundwater by maximizing the natural drainage patterns and the
retention of natural vegetation and other pervious surfaces.

Require development to minimize the use of directly connected impervious
surfaces and to retain stormwater runoff caused from the development
footprint at or near the site of generation.

WS-B: SANDAG shall and other implementing agencies can and should utilize reclaimed
water (also known as recycled water) to the greatest extent feasible during design
and construction of the projects implementing the 2050 RTP/SCS, to minimize
potential impacts to the San Diego regional water supply. Recycled water can be
used to fill lakes, ponds, and ornamental fountains; to irrigate parks, campgrounds,
golf courses, freeway medians, community greenbelts, and school athletic fields;
and to control dust at construction sites. Recycled water can also be used in certain
industrial processes and for flushing toilets and urinals in nonresidential buildings.
For example, local firms have dual-plumbed buildings to allow the use of recycled
water for toilet and urinal flushing and for use in cooling towers. Recycled water
could also be used for street sweeping purposes.

Findings and Rationale

For the significant impact associated with an inadequate water supply, the SANDAG Board of
Directors finds that changes or alterations as set forth in mitigation measures WS-A and WS-B
have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact.
The SANDAG Board of Directors finds that some of the changes and alterations described in this
mitigation measure are within the responsibility of SANDAG, while others are within the
responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes
and alterations can and should be adopted by those other agencies. For example, since certain
growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies,
such as cities in the San Diego region and the County of San Diego rather than SANDAG, these
local agencies are responsible for ensuring mitigation measures WS-A and WS-B are applied
within their jurisdictions.

Although mitigation measures WS-A and WS-B would reduce the significant impact associated
with an inadequate water supply, the impact remains significant and unavoidable because there is
no assurance that this mitigation measure would reduce impacts of all development and
transportation network improvement projects to a less than significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other
considerations, including provision of employment opportunities for highly trained workers, make
additional mitigation measures or project alternatives identified in the EIR infeasible. Specifically,
SANDAG has considered the following mitigation measures and has determined they are
infeasible for the reasons described below:

For impact WS-1, measures could be taken to curtail growth in the San Diego region until water
supplies and facilities are sufficient. As described in Section 4.11, Land Use, these additional
measures have a number of disadvantages and were found to be infeasible.

- Implement economic disincentives such as increased taxes, development fees, and similar
types of economically based actions to slow growth of both regional population and
employment. The resulting slower growth would serve to reduce the need for expanded or new water supplies and facilities.

This measure was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. It would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs, as increased taxes and other economic disincentives would elevate costs associated with travel such as increased gas prices or higher transit fees. This measure would also be in direct opposition of the project objection to provide a transportation system that supports improvement of the region’s standard of living as it would place an added economic burden on residents and businesses in the San Diego region in addition to the already difficult economic situation. It would have a negative impact on the economic prosperity and viability of the region as a center for regional distribution and the goods movement industry. Please see Section 4.11, Land Use, for additional information.

- Implement a regional growth strategy that promotes very restrictive zoning policies and land use regulations intended to limit future residential and economic growth within the San Diego region. Limiting growth would serve to reduce the need for expanded or new water supplies and facilities.

Implementation of a highly restrictive regional growth strategy was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. Consideration of this measure found that these types of restrictions on future residential growth could result in increased interregional commuting, higher housing costs, and reduced economic success. It would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as the need for increased interregional travel would not be convenient for San Diego residents and would increase their commute costs. This measure would not achieve the objective to provide a transportation system that supports improvement of the region’s standard of living as more residents would have to commute out of the region for employment and reduced economic success would negatively impact the overall standard of living. Increasing the need to commute out of the region would not achieve the objective to provide an environmentally sustainable transportation system as longer commutes require additional resources compared to short local commutes. As detailed in the discussion above and shown in Table 4.11-5, restricting and limiting growth as proposed by this measure would result in noncompliance with SB 375.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**WS-1 (Impact associated with transportation network improvements) Increase the use of existing available water supplies or water treatment and other facilities such that water supplies or facilities would be inadequate to serve existing and projected future demand (2050)**

**Significant Impacts**

Implementation of the 2050 RTP/SCS would result in significant transportation network improvement impacts associated with impact WS-1, the provision of regional water supplies and availability of water treatment facilities in 2050.
Mitigation (EIR Section 4.17.5)

Implementation of mitigation measures WS-A and WS-B would reduce these impacts, though not to a less than significant level.

Findings and Rationale

For the significant impact associated with an inadequate water supply, the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures WS-A and WS-B have been required in, or incorporated into, the 2050 RTP/SCS to lessen this significant impact. The SANDAG Board of Directors finds that some of the changes and alterations described in this mitigation measure are within the responsibility of SANDAG, while others are within the responsibility and jurisdiction of other public agencies and not SANDAG, and that those changes and alterations can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measures WS-A and WS-B are applied within their jurisdictions.

Although mitigation measures WS-A and WS-B would reduce the significant impact associated with an inadequate water supply, the impact remains significant and unavoidable because there is no assurance that this mitigation measure would reduce impacts of all development and transportation network improvement projects to a less than significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR infeasible. Specifically, SANDAG has considered the following mitigation measures and has determined they are infeasible for the reasons described below:

For impact WS-1, measures could be taken to curtail growth in the San Diego region until water supplies and facilities are sufficient. As described in Section 4.11, Land Use, these additional measures have a number of disadvantages and were found to be infeasible.

- Implement economic disincentives such as increased taxes, development fees, and similar types of economically based actions to slow growth of both regional population and employment. The resulting slower growth would serve to reduce the need for expanded or new water supplies and facilities.

This measure was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. It would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs, as increased taxes and other economic disincentives would elevate costs associated with travel such as increased gas prices or higher transit fees. This measure would also be in direct opposition of the project objection to provide a transportation system that supports improvement of the region’s standard of living as it would place an added economic burden on residents and businesses in the San Diego region in addition to the already difficult economic situation. It would have a negative impact on the economic prosperity and viability of the region as a center for regional distribution and the goods movement industry. Please see Section 4.11, Land Use, for additional information.
• Implement a regional growth strategy that promotes very restrictive zoning policies and land use regulations intended to limit future residential and economic growth within the San Diego region. Limiting growth would serve to reduce the need for expanded or new water supplies and facilities.

Implementation of a highly restrictive regional growth strategy was considered infeasible because it would not achieve the 2050 RTP/SCS fundamental objectives. Consideration of this measure found that these types of restrictions on future residential growth could result in increased interregional commuting, higher housing costs, and reduced economic success. It would not achieve the objective to provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs as the need for increased interregional travel would not be convenient for San Diego residents and would increase their commute costs. This measure would not achieve the objective to provide a transportation system that supports improvement of the region’s standard of living as more residents would have to commute out of the region for employment and reduced economic success would negatively impact the overall standard of living. Increasing the need to commute out of the region for employment and reduced economic success would negatively impact the overall standard of living. Increasing the need to commute out of the region would not achieve the objective to provide an environmentally sustainable transportation system as longer commutes require additional resources compared to short local commutes. As detailed in the discussion above and shown in Table 4.11-5, restricting and limiting growth as proposed by this measure would result in noncompliance with SB 375.

Since no feasible mitigation measures or project alternatives have been found to reduce the impact to a less than significant level, this impact remains significant and unavoidable.

**Cumulative Water Supply (EIR 5.2.17) – WS-1**

**Significant Impacts**

Because cumulative impacts associated with impact WS-1, increased use of water supply or water treatment facilities throughout the Lower Colorado River basin and northern Baja region by 2020, 2035 and 2050 would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with this issue are cumulatively considerable.

**Mitigation (EIR Section 4.17.5)**

Implementation of mitigation measures WS-A and WS-B above would reduce project impacts, though not to less than significant levels.

**Findings and Rationale**

For the significant cumulative impacts associated with increased use of water supply or water treatment facilities (Impact WS-1), the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measures WS-A and WS-B have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. As described in this mitigation measure, changes or alterations are within the responsibility and jurisdiction of public agencies other than SANDAG and can and should be adopted by those other agencies. For example, since certain growth/land use changes and transportation network improvements identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local
agencies are responsible for ensuring mitigation measures WS-A and WS-B are applied within their jurisdictions.

Although mitigation measures WS-A and WS-B reduce the significant impact resulting associated with the increased use of water supply or water treatment facilities, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measure would reduce impacts of all land use development projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

**Cumulative Water Supply (EIR Section 5.2.17) – WS-2**

**Significant Impacts**

Because cumulative impacts related to the need for construction of new or expanded water treatment facilities (Impact WS-2) and other projects throughout the Lower Colorado River Basin and northern Baja California that would influence water demand and supply would be significant, and because the 2050 RTP/SCS incremental impacts are significant, the 2050 RTP/SCS incremental impacts associated with this issue are cumulatively considerable.

**Mitigation (EIR Section 4.17.5)**

Implementation of mitigation measure WS-C would reduce project impacts, but not to a less than significant level.

**Findings and Rationale**

For the significant cumulative impacts associated with the need for construction of new or expanded water treatment facilities and conveyance facilities (Impact WS-2), the SANDAG Board of Directors finds that changes or alterations as set forth in mitigation measure WS-C have been required in, or incorporated into, the 2050 RTP/SCS to avoid or substantially lessen this significant impact. As described in this mitigation measure, changes or alterations are within the responsibility and jurisdiction of public agencies other than SANDAG and can and should be adopted by those other agencies. For example, since certain growth/land use changes identified in the 2050 RTP/SCS are controlled by other public agencies, such as cities in the San Diego region and the County of San Diego rather than SANDAG, these local agencies are responsible for ensuring mitigation measure WS-C is applied within their jurisdictions.

Although mitigation measure WS-C reduces the significant impact resulting associated with the construction of new or expanded water treatment and conveyance facilities, the 2050 RTP/SCS incremental contributions to significant cumulative impacts will remain cumulatively considerable post-mitigation because there is no assurance that this mitigation measure would reduce impacts of all land use development projects to a less than significant level. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives identified in the EIR, infeasible. Since no feasible
mitigation measures or project alternatives have been found to reduce the cumulative impact to a less than significant level, this impact remains significant and unavoidable for 2020, 2035 and 2050.

VI. FINDING REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

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

Implementation of the 2050 RTP/SCS would result in permanent changes to the existing environment, which have been described throughout this EIR. While the 2050 RTP/SCS focuses development into existing urban areas and along existing or future transportation corridors, there will still be some conversion of undeveloped land to urbanized uses. These conversions are considered to be a permanent change and would occur directly through construction of development on undeveloped land. Land use changes and transportation network improvements would result in significant irreversible impacts to aesthetics and visual resources, including changes to existing community character and views. Future development projects associated with the 2050 RTP/SCS would result in a direct irreversible loss of native habitat that supports rare, threatened, or endangered species, and impacts to these resources would represent a significant and irreversible environmental change.

The development of currently undeveloped land and other land use changes would result in significant irreversible impacts to agricultural resources and forest lands, and the availability of known mineral resources. The 2050 RTP/SCS would substantially induce irreversible population growth. This growth would displace existing houses and businesses, and result in additional people that would be susceptible to noise impacts. As development occurs at urban edges, additional people and structures would be at risk from wildland fires. GHG emissions would substantially increase.

Development pursuant to 2050 RTP/SCS land use policies would result in the irreversible consumption of nonrenewable resources. Resources anticipated to be irreversibly consumed over the 40-year timespan of the 2050 RTP/SCS include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water. Development associated with the 2050 RTP/SCS represents a long-term commitment to the consumption of fossil fuel oil and natural gas. These increased energy demands relate to construction, lighting, heating, and cooling of residences and buildings, and construction and operation of transit systems.

VII. FINDING REGARDING GROWTH-INDUCING IMPACTS

The SANDAG Board of Directors has reviewed and considered the information on growth-inducing impacts, including the information provided in comments on the Draft EIR and the responses to those comments in the Final EIR. CEQA guidelines (§15126.2(d)) require a discussion of growth-inducing impacts of the proposed Project. A project may be considered growth inducing when it:
• Fosters economic growth, population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment;
• Removes obstacles to population growth or additional housing;
• Burdens existing community service facilities beyond current/projected capacities; or
• Encourages or facilitates other activities that could significantly affect the environment.

Growth is generally dependent on the availability of existing utilities and public services in an area. The provision of new utilities and services in an undeveloped area can induce growth in that area. Such growth may or may not be anticipated in local land use planning documents. If a project stimulates development of urban uses, it would have a significant growth-inducing effect. Growth inducement can also occur if the proposed project makes it more feasible to increase the density of development in surrounding areas. Growth may be considered beneficial, detrimental, or of little significance to the environment, depending on its actual impacts to the environmental resources present and the secondary effects growth may have on the resources.

Although the San Diego region is projected to grow with or without implementation of the 2050 RTP/SCS, the 2050 RTP/SCS focuses population and economic growth in strategic areas near transit and transportation services and in areas with existing utilities and municipal or public services. The long-term growth pattern included in the 2050 RTP/SCS would decrease environmental impacts in vacant or undisturbed lands or open space.

The proposed project features included in the 2050 RTP/SCS are intended to expand upon the current transportation network and enhance the transit-oriented transportation opportunities to improve the mobility of people and goods in and around the region, while reducing GHG emissions and other environmental impacts. The 2050 RTP/SCS includes the expansion of existing transportation and transit routes, which would remove obstacles to growth in some areas of the region and support additional housing, population, and economic growth. Section 4.13, Population and Housing, discusses projected regional population and employment growth associated with the 2050 RTP/SCS.

One of the primary objectives of the 2050 RTP/SCS is to provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns, thereby increasing the number of housing units within specific areas identified in the land use plans of local jurisdictions. Therefore, by its very nature (increasing the density of development), the 2050 RTP/SCS is growth inducing. However, the area the 2050 RTP/SCS targets for construction of these additional housing units is within existing developed areas. Therefore, it is likely that many of these areas have already established roadways and utilities, as well as water and sewer services. The placement of additional housing units in established areas may require upgrading and resizing of existing infrastructure, including water facilities. Therefore, implementation of the 2050 RTP/SCS would cause significant construction of additional housing.

VIII. FINDINGS REGARDING ALTERNATIVES EVALUATED IN EIR

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

A. LEGAL REQUIREMENTS FOR ALTERNATIVES

Public Resources Code § 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives...which would substantially lessen the significant environmental effects of such projects.” “Feasible” means “capable of being accomplished in a reasonable period of time taking into account economic, environmental, legal, social, and technological factors” (CEQA Guidelines § 15364). The concept of feasibility also encompasses whether a particular alternative promotes the Project’s underlying goals and objectives, and whether an alternative is impractical or undesirable from a policy standpoint. (See City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 410; California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957.)

The issue of alternatives feasibility arises twice in the CEQA process, once when the EIR is prepared, and again when CEQA findings are adopted. When assessing feasibility in an EIR, the EIR preparer evaluates whether an alternative is “potentially” feasible. Potentially feasible alternatives are suggestions by the EIR preparers which may or may not be adopted by lead agency decisionmakers. When CEQA findings are made after EIR certification, the lead agency decisionmaking body independently evaluates whether the alternatives are actually feasible, including whether an alternative is impractical or undesirable from a policy standpoint. (See California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957.)

If a significant impact can be substantially lessened (i.e., mitigated to a less than significant level) by adoption of mitigation measures, lead agency findings need not consider the feasibility of alternatives to reduce that impact. (See Laurel Hills Homeowners Association v. City Council (1978) 83 Cal.App.3d 515.) Nevertheless, Chapter 6 of the Project EIR and these Findings of Fact do consider the ability of potentially feasible alternatives to substantially reduce all of the Project’s significant impacts, even those impacts reduced to less-than-significant levels through adoption of mitigation measures.

An EIR must only evaluate reasonable alternatives to a project that could feasibly attain most of the project objectives and evaluate the comparative merits of the alternatives (CEQA Guidelines § 15126.6(a)). In all cases, the consideration of alternatives is to be judged against a rule of reason. The lead agency is not required to choose the environmentally superior alternative identified in the EIR if the alternative does not provide substantial advantages over the proposed Project; and (1) through the imposition of mitigation measures the environmental effects of a project can be reduced to an acceptable level, or (2) there are social, economic, technological, or other considerations that make the alternative infeasible. (Pub. Res. Code §§21002, 21002.1; CEQA Guidelines §15092.)

B. PROJECT OBJECTIVES

Project alternatives, as described in Chapter 6.0 Alternatives Analysis of the EIR, were intended to achieve the following fundamental objectives of the 2050 RTP/SCS:

1. Provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns that:
- Accommodate the region’s future employment and housing needs, and protect sensitive habitat and resource areas
- Manage transportation system demands and transportation system efficiency in innovative ways
- Meet GHG emissions targets for passenger cars and light-duty trucks: per capita CO₂ reductions of 7 percent by 2020 and 13 percent by 2035 (compared to a 2005 baseline) levels
- Improve air quality in the region
- Make transportation investments that result in healthy and sustainable communities

2. Provide a safe regional transportation system by:
   - Improving operations to increase safety
   - Maintaining the system in a good state of repair
   - Improving emergency preparedness

3. Provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs by:
   - Making system improvements to better connect people with jobs and other activities
   - Offering convenient travel choices, including transit, intercity and high-speed trains, driving, ridesharing, walking, and biking
   - Preserving and expanding options for regional freight movement
   - Increasing the use of transit, ridesharing, walking, and biking
   - Offering transportation choices to better connect the San Diego region with Mexico, neighboring counties, and tribal nations

4. Provide a transportation system that supports improvement of the region’s standard of living by:
   - Using transportation investments to create economic benefits
   - Enhancing the goods movement system to support economic prosperity

5. Provide a reliable transportation system that offers relatively consistent travel times by mode from day to day by:
   - Employing new technologies to make travel more reliable and convenient
   - Managing the efficiency of the transportation system to improve traffic flow

6. Provide a transportation system that offers an equitable level of service for all populations by:
   - Creating equitable transportation opportunities for all communities of concern
   - Ensuring access to jobs, services, and recreation for populations with fewer transportation choices
C. ALTERNATIVES ANALYZED IN THE EIR

The EIR considered the following seven alternatives to the proposed 2050 RTP/SCS: (1) No Project; (2) Modified Funding Strategy/2050 Growth Forecast Land Use; (3) Modified Funding Strategy/Modified Land Use; (4) Transit Emphasis/Modified Phasing/2050 Growth Forecast Land Use; (5) Transit Emphasis/Modified Phasing/Modified Land Use; (6) 2050 RTP/SCS Transportation Network/Modified Land Use; and (7) Slow Growth. These seven alternatives are summarized below and described in more detail in Chapter 6.0 of the EIR.

Alternative 1: No Project

Description

As described in detail in Section 6.2 of the EIR, the No Project Alternative assumes no adoption of the 2050 RTP/SCS.

Alternative 1 would assume the 2050 Regional Growth Forecast land use (the same as that included in the 2050 RTP/SCS) and would include transportation projects currently under construction or development, as listed in Tables 6.2-1 and 6.2-2 and shown in Figures 6.0-1 and 6.0-2 of the Final EIR. It would not include any proposed federally-funded transportation improvements. (Final EIR pp. 6-7–6-10.)

Findings and Rationale

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

As set forth in detail in Section 6.3 of the EIR, Alternative 1 (No Project) has greater environmental impacts than the proposed Project in the following resource areas: (1) Agriculture and Forest Resources; (2) Air Quality; (3) Biological Resources; (4) Cultural Resources and Paleontology; (5) Geology, Soils and Mineral Resources; (6) Greenhouse Gas Emissions; (7) Hazards and Hazardous Materials; (8) Hydrology and Water Quality; (9) Land Use; (10) Transportation; and (11) Water Supply. Alternative 1 has lesser environmental impacts than the proposed Project in the following resource areas: (1) Aesthetics and Visual Resources; and (2) Noise. The impacts of Alternative 1 are generally the same for the resource areas of (1) Environmental Justice; (2) Population and Housing; and (3) Recreation. The No Project Alternative does not reduce any of the 2050 RTP/SCS significant impacts to less than significant levels.

On balance, the environmental benefits of Alternative 1 do not outweigh its environmental disadvantages when compared to the Project.

In addition, Alternative 1 would fail to meet any of the fundamental project objectives described in the Final EIR (Chapter 6.0 Alternatives Analysis). First, Alternative 1 would not provide an environmentally sustainable transportation system and Sustainable Communities Strategy, fostering efficient concentrated land development patterns. This alternative would not meet this fundamental objective because it would not accommodate the region’s future employment and housing needs, all transit improvements associated with the 2050 RTP/SCS would not be available, and efficient management of the transportation system and demands on the system would not be provided to the same degree as with the 2050 RTP/SCS. GHG emissions targets for passenger cars and light-trucks would also not be met by Alternative 1 and air quality in the region...
would not be improved to the degree offered by the 2050 RTP/SCS. Also, needed transportation investments resulting in healthy and sustainable communities would not be made.

Second, Alternative 1 would not provide a safe regional transportation system, in that it would not improve operations to increase safety to the same degree as the 2050 RTP/SCS. Nor would it maintain the system in a good state of repair or improve emergency preparedness as would the 2050 RTP/SCS.

Third, Alternative 1 would not provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs. It would not make system improvements to better connect people with jobs and other activities, as would the 2050 RTP/SCS, nor would it offer convenient travel choices, including transit, intercity and high-speed rail, driving, ridesharing, walking, and biking. Alternative 1 would not preserve and expand options for regional freight movement or increase the use of transit, ridesharing, walking and biking in the way the 2050 RTP would. Finally, transportation choices to better connect the San Diego region with Mexico, neighboring counties, and tribal nations would not be offered at the same level as with the 2050 RTP/SCS.

Fourth, Alternative 1 would not provide a transportation system that supports improvement of the region’s standard of living to the same degree as the 2050 RTP/SCS. It would not use transportation investments to create economic benefits, nor would it enhance the goods movement system to support economic prosperity as would the 2050 RTP/SCS.

Fifth, Alternative 1 would not provide a reliable transportation system that offers relatively consistent travel times by mode from day to day as would the 2050 RTP/SCS. New technologies to make travel more reliable and convenient would not be employed, nor would the efficiency of the transportation system be managed to improve traffic flow to the same degree offered by the 2050 RTP/SCS.

Sixth, Alternative 1 would not provide a transportation system that offers an equitable level of service for all populations to the same degree as the 2050 RTP/SCS. It would not create equitable transportation opportunities for all communities of concern, nor would it ensure access to jobs, services, and recreation for populations with fewer transportation choices as would the 2050 RTP/SCS.

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

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

For the reasons described above, Alternative 1 is not feasible.

**Alternative 2a: Modified Funding Strategy/2050 Growth Forecast Land Use**

**Description**

As described in detail in Section 6.2 of the EIR, this alternative implements a modified funding strategy based on a modification of the *TransNet* allocation.

**Regional Growth/Land Use Change**

This alternative assumes the 2050 Regional Growth Forecast would be implemented (same as included in the 2050 RTP/SCS).

**Transportation Network Improvements**

For transportation network improvements, the modified funding strategy would reduce the number of highway improvements overall and change their phasing. It would also add transit projects, increase service frequencies, and alter project phasing to increase the number of transit projects that are implemented earlier than under the 2050 RTP/SCS. (See Final EIR Tables 6.2.3, 6.2.4 and 6.2.5 for descriptions of the individual improvements and Figures 6.0-3 and 6.0-4; see also Final EIR pp. 6-10–6-20.)

**Findings and Rationale**

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

As set forth in detail in Section 6.3 of the EIR, Alternative 2a (Modified Funding Strategy/2050 Growth Forecast Land Use) would have greater impacts than the proposed Project in the following resource area: (1) land use. Alternative 2a would have lesser impacts than the proposed Project in the following resource areas: (1) aesthetics and visual resources; (2) agriculture and forest resources; (3) air quality; (4) biological resources; (5) cultural resources and paleontology; (6) geology, soils and mineral resources; (7) hydrology and water quality; and (8) noise.

The impacts of Alternative 2a are generally the same in the following resource areas: (1) environmental justice; (2) greenhouse gas emissions; (3) hazards and hazardous materials; (4) population and housing; (5) public services, utilities and energy; (6) recreation; and (7) water supply.

The transportation impact of Alternative 2a is complex and described in more detail below.
Regional Growth/Land Use Change

Alternative 2a would have the same land use pattern as the 2050 RTP/SCS.

Transportation Network Improvements

Compared to the 2050 RTP/SCS, Alternative 2a would place greater priority on transit improvements and less priority on highway improvements.

As shown in Table 6.1-1 of the Final EIR, Alternative 2a meets all of the fundamental project objectives. However, it achieves some important project objectives to a lesser extent than the Project. These are described in Fundamental Objectives 2, 3 and 5 (above), and analyzed through Impacts T-1, T-2, T-4 and T-5. Fundamental Objective 2 states, in part “Provide a safe regional transportation system by: ... Improving emergency preparedness.” Fundamental Objective 3 states, in part: “Provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs by: making system improvement to better connect people with jobs and activities.” Fundamental Objective 5 states, in part, “Provide a reliable transportation system that offers relatively consistent travel times by mode from day to day by: ... managing the efficiency of the transportation system to improve traffic flow.” These differences are most apparent for years 2035 and 2050 and are show in EIR Table 6.4-1: Impacts Comparison.

In general for the years 2020 and 2035, Alternative 2a reduces or maintains several 2050 RTP/SCS less than significant impacts related to travel times, and in 2050 increases 2050 RTP/SCS impacts related to travel times. In 2035 and 2050 this shift in priority also causes some congestion-related 2050 RTP/SCS impacts that are less than significant to become significant, and in 2050 worsens other 2050 RTP/SCS congestion-related impacts that are already significant. These differences are shown in EIR Tables 6.3-1 through 6.3-7, Comparison of Alternatives (1, 2a, 2b, 3a, 3b, 4 and 5) to 2050 RTP/SCS and Table 6.4-1 Impacts Comparison: 2050 RTP/SCS and Alternatives Considered and are most apparent for years 2035 and 2050.

Conclusion

The environmental factors of highest priority to the Board that provide the greatest distinction between the Project and Alternative 2a relate to transportation. Alternative 2a would substantially increase travel time for work and higher education trips (Impact T-2) in 2050, compared to the 2050 RTP/SCS. With Alternative 2a, there would be a substantial worsening of congestion related impacts (Impact T-4 ) that would occur in 2035 and a worsening of the impact that would already be significant in 2050 under the proposed 2050 RTP/SCS. For other congestion related impacts (Impact T-5), there would be a substantial worsening in 2035 and 2050 under Alternative 2a. Alternative 2a does not reduce any of the Project’s significant transportation impacts to less-than-significant levels, and it causes several of the Project’s less-than-significant transportation impacts to become significant: Impacts T-4 and T-5 in 2035, and Impacts T-2 and T-5 in 2050. Therefore, the transportation impacts attributable to Alternative 2a, on the whole, are greater than those of the 2050 RTP/SCS.

Additionally, Alternative 2a is financially infeasible. The 2050 RTP/SCS maximizes the investment in transit services based on projected funding that is eligible for transit projects for each of the phasing periods. More than half (56%) of the TransNet Early Action Program through 2015 (along with other local, state, and federal revenues it leverages) funds transit projects included in the 2050 RTP/SCS. For projects to move up in priority, other transit projects would have to be shifted to a later phasing period. This limited flexibility is further constrained by the annual allocation of
most funds, which cannot be advanced. Regarding project priority, deferring a highway project in favor of a transit project is not always feasible given restrictions on how funds can be used. In situations where funds are flexible, funding could be spent on highway or transit projects. The proposed implementation priorities in the 2050 RTP/SCS reflect the goal to have a mixture of rail and bus transit improvements in each phasing period. Most of the highway expenditures included in the 2050 RTP/SCS are for managed lanes that will accommodate transit and carpoolers. Many of the highway facilities to be constructed in the next 10 years will serve transit routes. Additionally, SANDAG is limited by revenues restrictions for most funding sources. To the extent SANDAG could advance transit capital projects with flexible funds, additional operating dollars would be needed which are not contemplated as reasonably available funding in the revenue constrained plan.

For the reasons described above, Alternative 2a is infeasible.

**Alternative 2b: Modified Funding Strategy/Modified Land Use**

**Description**

As described in detail in Section 6.2 of the EIR, this alternative includes a modified funding strategy together with a modified land use pattern.

**Regional Growth/Land Use Change**

The modified land use pattern is based on the Smart Growth Concept Map (SANDAG 2008). Compared to the 2050 RTP/SCS, this modified pattern would add infill and redevelopment to increase residential development density within the Urban and Town Center designations and increase employment within the Job Centers (see Figures 6.0-5 and 6.0-6; see also Final EIR pp. 6-20–6-23).

**Transportation Network Improvements**

The transportation network would be the same as in Alternative 2a.

**Findings and Rationale**

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

As set forth in detail in Section 6.3 of the EIR, Alternative 2b (Modified Funding Strategy/Modified Land Use) has greater environmental impacts than the proposed Project in the following resource areas: (1) land use; and (2) population and housing. Alternative 2b has lesser environmental impacts than the proposed Project in the following resource areas: (1) aesthetics and visual resources; (2) agriculture and forest resources; (3) air quality; (4) biological resources; (5) cultural resources and paleontology; (6) geology, soils and mineral resources; (7) hazards and hazardous materials; (8) hydrology and water quality; (9) public services, utilities and energy; and (10) water supply.

The impacts of Alternative 2b are generally the same for the resource areas of (1) environmental justice; (2) greenhouse gas emissions; (3) noise; and (4) recreation.
The transportation impact of this alternative is complex and described in more detail below.

Regional Growth/Land Use Change

Alternative 2b calls for a modified, more compact land use pattern. This modified land use alternative would substantially lessen the significant impacts of the 2050 RTP/SCS caused by development related ground disturbance in the eastern two thirds of the County, while somewhat increasing these impacts in the more urban western third of the County. Alternative 2b would not reduce the significant subregional impacts caused by development-related ground disturbance to less than significant levels, but it would substantially lessen these impacts subregionally in the eastern two-thirds of the County. Compared to the 2050 RTP/SCS, Alternative 2b would result in substantially less vacant land being developed in the region: 10,884 less acres by 2020, 79,739 less acres by 2035, and 86,156 acres by 2050.

Alternative 2b would substantially lessen the significant impacts of the 2050 RTP/SCS on wastewater facilities, storm water facilities, energy resources, and water supplies. Compact land use patterns have been shown both to decrease the demands for these public utilities, energy resources, and water supplies, and reduce or delay the need for construction of new or expanded facilities to meet these demands.

Transportation Network Improvements

Compared to the 2050 RTP/SCS, Alternative 2b would place greater priority on transit improvements and less priority on highway improvements.

As shown in Table 6.1-1 of the Final EIR, Alternative 2b meets all of the fundamental project objectives. However, it achieves some important project objectives to a lesser extent than the Project. These are described in Fundamental Objectives 2, 3 and 5 (above), and analyzed through Impacts T-1, T-2, T-4 and T-5. Fundamental Object 2 states, in part “Provide a safe regional transportation system by: … Improving emergency preparedness.” Fundamental Objective 3 states, in part: “Provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs by: making system improvement to better connect people with jobs and activities.” Fundamental Objective 5 states, in part, “Provide a reliable transportation system that offers relatively consistent travel times by mode from day to day by: … managing the efficiency of the transportation system to improve traffic flow.” These differences are most apparent for years 2035 and 2050 and are show in EIR Table 6.4-1: Impacts Comparison.

In general for the years 2020 and 2035, Alternative 2b increases or maintains several 2050 RTP/SCS less than significant impacts related to travel times, and in 2050 increases 2050 RTP/SCS impacts related to travel times. In 2035 and 2050 this shift in priority also causes some congestion-related 2050 RTP/SCS impacts that are less than significant to become significant, and in 2050 worsens other 2050 RTP/SCS congestion-related impacts that are already significant. These differences are shown in EIR Tables 6.3-1 through 6.3-7, Comparison of Alternatives (1, 2a, 2b, 3a, 3b, 4 and 5) to 2050 RTP/SCS and Table 6.4-1 Impacts Comparison: 2050 RTP/SCS and Alternatives Considered and are most apparent for years 2035 and 2050

Conclusion

The environmental factors of highest priority to the Board that provide the greatest distinction between the Project and Alternative 2b relate to transportation. With Alternative 2b, there would be a substantial increase in work and higher education trip travel time in 2050 compared to the 2050
RTP/SCS. (Impact T-2) Also with Alternative 2b, there would be a substantial worsening of congestion related impacts (Impact T-4) that would occur in 2035 and a worsening of congestion-related impacts that would already be significant in 2050 under the proposed 2050 RTP/SCS. For other congestion related impacts (Impact T-5), there would be a substantial worsening in 2035 and 2050 under Alternative 2b. Alternative 2b does not reduce any of the Project’s significant transportation impacts to less-than-significant levels, and it causes several of the Project’s less-than-significant transportation impacts to become significant: Impacts T-4 and T-5 in 2035, and Impacts T-2 and T-5 in 2050. Therefore, the transportation impacts attributable to Alternative 2b, on the whole, represent a greater impact than the 2050 RTP/SCS.

Also, Alternative 2b is financially infeasible. The 2050 RTP/SCS maximizes the investment in transit services based on projected funding that is eligible for transit projects for each of the phasing periods. More than half (56%) of the TransNet Early Action Program through 2015 (along with other local, state, and federal revenues it leverages) funds transit projects included in the 2050 RTP/SCS. For projects to move up in priority, other transit projects would have to be shifted to a later phasing period. This limited flexibility is further constrained by the annual allocation of most funds, which cannot be advanced. Regarding project priority, deferring a highway project in favor of a transit project is not always feasible given restrictions on how funds can be used. In situations where funds are flexible, funding could be spent on highway or transit projects. The proposed implementation priorities in the 2050 RTP/SCS reflect the goal to have a mixture of rail and bus transit improvements in each phasing period. Most of the highway expenditures included in the 2050 RTP/SCS are for managed lanes that will accommodate transit and carpools. Many of the highway facilities to be constructed in the next 10 years will serve transit routes. Additionally, SANDAG is limited by revenues restrictions for most funding sources. To the extent SANDAG could advance transit capital projects with flexible funds, additional operating dollars would be needed which are not contemplated as reasonably available funding in the revenue constrained plan.

In addition, Alternative 2b is legally infeasible. The 2050 RTP/SCS land use pattern is based on existing local jurisdictions’ land use plans. For land use scenarios beyond the 20-25 year horizon of most general plans, each jurisdiction provided information for the forecast. Federal air quality conformity law requires RTPs to be based on the “most recent planning assumptions” at the time the conformity analysis begins. (40 CFR 93.110(a).) If the 2050 RTP/SCS provided a land use pattern that was substantially different from local general plans and planning assumptions, the RTP would be inconsistent with air quality conformity law, and the Draft EIR’s analysis of future conditions and impacts would not be realistic. Further, SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS or a more intensified land use pattern. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS. (Government Code §65080(b)(2)(J).)

For the reasons described above, Alternative 2b is infeasible.

**Alternative 3a: Transit Emphasis/Modified Phasing/2050 Growth Forecast Land Use**

**Description**

As described in detail in Section 6.2 of the EIR, Alternative 3a would implement a transportation network emphasizing transit and modifying the phasing of transportation improvements together with the 2050 Regional Growth Forecast land use.
Regional Growth/Land Use Change

This alternative assumes the 2050 Regional Growth Forecast would be implemented (same as included in the 2050 RTP/SCS).

Transportation Network Improvements

This alternative would advance some transit projects earlier in the project phasing process than the proposed 2050 RTP/SCS. Changes to the project phasing schedule for the transit emphasis strategy would be the same as those included in the modified funding strategy (Alternatives 2a and 2b). The transit emphasis strategy differs from the modified funding strategy in that projects would be the same as those included in the 2050 RTP/SCS, with no additional services. The transit emphasis strategy would also implement the majority of highway projects in the 2050 RTP/SCS.

Table 6.2-6 of the Final EIR is a list of highway projects that would be implemented under this alternative and Table 6.2-7 is a list of transit projects that would be implemented under this alternative (see Figures 6.0-7 and 6.0-8; see also Final EIR pp. 6-23–6-30).

Findings and Rationale

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

As set forth in detail in Section 6.3 of the EIR, Alternative 3a (Transit Emphasis/Modified Phasing/2050 Growth Forecast Land Use) has greater environmental impacts than the proposed Project in the following resource areas: (1) greenhouse gas emissions. Alternative 3a has lesser environmental impacts than the proposed Project in the following resource areas: (1) air quality; (2) geology, soils and mineral resources; (3) hydrology and water quality; and (4) noise.

The impacts of Alternative 3a are generally the same for the resource areas of 1) aesthetics and visual resources; 2) agriculture and forest resources; 3) biological resources; 4) cultural resources and paleontology; 5) environmental justice; 6) hazards and hazardous materials; 7) land use; 8) population and housing; 9) public services, utilities and energy; 10) recreation; and 11) water supply.

The transportation impact of this alternative is complex and described in more detail below.

Regional Growth/Land Use Change

Alternative 2a would have the same land use pattern as the 2050 RTP/SCS.

Transportation Network Improvements

Alternative 3a would place greater emphasis on transit improvements and less emphasis on highway improvements. (Final EIR pp. 6-23–6-30).

As shown in Table 6.1-1 of the Final EIR, Alternative 3a meets all of the fundamental project objectives. However, it achieves some important project objectives to a lesser extent than the Project. These are described in Fundamental Objectives 2, 3 and 5 (above), and analyzed through
Impacts T-1, T-2, T-4 and T-5. Fundamental Objectives 2, 3 and 5 (above) and analyzed through Impacts T-1, T-2, T-4 and T-5. Fundamental Object 2 states, in part “Provide a safe regional transportation system by: ... Improving emergency preparedness.” Fundamental Objective 3 states, in part: “Provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs by: making system improvement to better connect people with jobs and activities.” Fundamental Objective 5 states, in part, “Provide a reliable transportation system that offers relatively consistent travel times by mode from day to day by: ... managing the efficiency of the transportation system to improve traffic flow.” These differences are most apparent for years 2035 and 2050 and are show in EIR Table 6.4-1: Impacts Comparison.

In general, for the year 2020, Alternative 3a increases travel times, although the impacts remain less than significant. In 2035, this shift reduces less than significant travel time impacts associated with the 2050 RTP/SCS, but substantially increases congestion impacts, a significant impact of this alternative. In 2050, travel time impacts for Alternative 3a are about the same as the 2050 RTP/SCS, but congestion impacts are greater. These differences are shown in EIR Tables 6.3-1 through 6.3-7, Comparison of Alternatives (1, 2a, 2b, 3a, 3b, 4 and 5) to 2050 RTP/SCS and Table 6.4-1 Impacts Comparison: 2050 RTP/SCS and Alternatives Considered and are apparent for years 2020, 2035 and 2050.

Conclusion

The environmental factors of highest priority to the Board that provide the greatest distinction between the Project and Alternative 3a relate to transportation. With Alternative 3a, work trip travel time (Impact T-1) would increase in 2020, 2035 and 2050, although, the impact would remain less than significant. Also with Alternative 3a, non work-related trip travel time (Impact T-3) would decrease in 2035, although this impact is already less than significant for the 2050 RTP/SCS. Alternative 3a does reduce a significant impact of the 2050 RTP/SCS (Impact T-3) to a less than significant level in 2050. However, with Alternative 3a there would be a substantial worsening of congestion related impacts (Impact T-4) that would occur in 2035 and a worsening of congestion-related impacts that would already be significant for Impact T-4 in 2050 under the proposed 2050 RTP/SCS. For other congestion related impacts (Impact T-5), there would be a substantial worsening in 2035 and 2050 under Alternative 3a. Alternative 3a reduces only one of the Project’s significant transportation impacts to less-than-significant levels (Impact T-3 in 2050), whereas it causes several of the Project’s less-than-significant transportation impacts to become significant: Impacts T-4 and T-5 in 2035, and Impact T-5 in 2050. Therefore, the transportation impacts attributable to Alternative 3a, on the whole, represent a greater impact than the 2050 RTP/SCS.

Also, Alternative 3a is financially infeasible. The 2050 RTP/SCS maximizes the investment in transit services based on projected funding that is eligible for transit projects for each of the phasing periods. More than half (56%) of the TransNet Early Action Program through 2015 (along with other local, state, and federal revenues it leverages) funds transit projects included in the 2050 RTP/SCS. For projects to move up in priority, other transit projects would have to be shifted to a later phasing period. This limited flexibility is further constrained by the annual allocation of most funds, which cannot be advanced. Regarding project priority, deferring a highway project in favor of a transit project is not always feasible given restrictions on how funds can be used. In situations where funds are flexible, funding could be spent on highway or transit projects. The proposed implementation priorities in the 2050 RTP/SCS reflect the goal to have a mixture of rail and bus transit improvements in each phasing period. Most of the highway expenditures included in the 2050 RTP/SCS are for managed lanes that will accommodate transit and carpools. Many of the highway facilities to be constructed in the next 10 years will serve transit routes. Additionally, SANDAG is limited by revenues restrictions for most funding sources. To the extent SANDAG
could advance transit capital projects with flexible funds, additional operating dollars would be needed which are not contemplated as reasonably available funding in the revenue constrained plan.

For the reasons described above, Alternative 3a is infeasible.

**Alternative 3b: Transit Emphasis/Modified Phasing/Modified Land Use**

**Description**

As described in detail in Section 6.2 of the EIR, this alternative would implement a transportation network emphasizing transit and modifying the phasing of transportation improvements (similar to Alternative 3a), together with a modified land use pattern as described in Alternative 2b.

**Regional Growth/Land Use Change**

Alternative 3b would implement the modified land use pattern described in Alternative 2b.

**Transportation Network Improvements**

Alternative 3b would implement the same transit emphasis/modified phasing transportation network described in Alternative 3a. Table 6.2-6 of the Final EIR is a list of highway projects that would be implemented under this alternative and Table 6.2-7 is a list of transit projects that would be implemented under this alternative (see Figures 6.0-5, 6.0-6, 6.0-7 and 6.0-8; see also Final EIR pp. 6-30–6-31)

**Findings and Rationale**

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

As set forth in detail in Section 6.3 of the EIR, Alternative 3b (Transit Emphasis/Modified Phasing/Modified Land Use) has greater environmental impacts than the proposed Project in the following resource areas: (1) greenhouse gas emissions; and (2) population and housing. Alternative 1 has lesser environmental impacts than the proposed Project in the following resource areas: (1) aesthetics and visual resources; (2) agriculture and forest resources; (3) air quality; (4) biological resources; (5) cultural resources and paleontology; (6) geology, soils and mineral resources; (7) hazards and hazardous materials; (8) hydrology and water quality; (9) public services, utilities and energy; and (10) water supply. The impacts of Alternative 1 are generally the same for the resource areas of: (1) environmental justice; (2) land use; (3) noise; and (4) recreation. The transportation impact of this alternative is complex and described in more detail below.

As shown in Table 6.1-1 of the Final EIR, Alternative 3b meets all of the fundamental project objectives. However, it achieves some important project objectives to a lesser extent than the Project. These are described in Fundamental Objectives 2, 3 and 5 (above), and analyzed through Impacts T-1, T-2, T-4 and T-5. Fundamental Objectives 2, 3 and 5 (above) and analyzed through Impacts T-1, T-2, T-4 and T-5. Fundamental Object 2 states, in part “Provide a safe regional transportation system by: … Improving emergency preparedness.” Fundamental Objective 3 states, in part: “Provide a transportation system that offers convenient travel options for people
and goods, as well as reasonable travel costs by: making system improvement to better connect people with jobs and activities." Fundamental Objective 5 states, in part, “Provide a reliable transportation system that offers relatively consistent travel times by mode from day to day by: … managing the efficiency of the transportation system to improve traffic flow." These differences are most apparent for years 2035 and 2050 and are show in EIR Table 6.4-1: Impacts Comparison.

**Regional Growth/Land Use Change**

Alternative 3b calls for a modified, more compact land use pattern. This modified land use alternative would substantially lessen the significant impacts of the 2050 RTP/SCS caused by development-related ground disturbance in the eastern two-thirds of the County, while somewhat increasing these impacts in the more urban western third of the County. Alternative 3b would not reduce the significant subregional impacts caused by development-related ground disturbance to less than significant levels, but it would substantially lessen these impacts subregionally in the eastern two-thirds of the County. Compared to the 2050 RTP/SCS, Alternative 3b would result in substantially less vacant land being developed in the region: 10,884 less acres by 2020, 79,739 less acres by 2035, and 86,156 acres by 2050.

There are also important regional differences between the 2050 RTP/SCS land use pattern and Alternative 3b in terms of public utilities, energy and water supply impacts. These modified land use patterns would substantially lessen the significant impacts of the 2050 RTP/SCS on wastewater facilities, storm water facilities, energy resources, and water supplies. Compact land use patterns have been shown both to decrease the demands for these public utilities, energy resources, and water supplies, and reduce or delay the need for construction of new or expanded facilities to meet these demands.

**Transportation Network Improvements**

Alternative 3b would place greater emphasis on transit improvements and less emphasis on highway improvements. (Final EIR pp. 6-30–6-31).

In general, for the year 2020, Alternative 3b increases travel times, although the impacts remain less than significant. In 2035, this shift reduces less than significant travel time impacts associated with the 2050 RTP/SCS, but substantially increases congestion impacts, a significant impact of this alternative. In 2050, travel time impacts for Alternative 3a are about the same as the 2050 RTP/SCS, but congestion impacts are greater. These differences are shown in EIR Tables 6.3-1 through 6.3-7, Comparison of Alternatives (1, 2a, 2b, 3a, 3b, 4 and 5) to 2050 RTP/SCS and Table 6.4-1 Impacts Comparison: 2050 RTP/SCS and Alternatives Considered and are apparent for years 2020, 2035 and 2050.

**Conclusion**

The environmental factors of highest priority to the Board that provide the greatest distinction between the Project and Alternative 3b relate to transportation. With Alternative 3b, work trip travel time (Impact T-1) would increase in 2020, 2035 and 2050, although, the impact would remain less than significant. Also with Alternative 3b, non work-related trip travel time (Impact T-3) would decrease in 2035, although this impact is already less than significant for the 2050 RTP/SCS. Alternative 3b does reduce a significant impact of the 2050 RTP/SCS (Impact T-3) to a less than significant level in 2050. However, with Alternative 3b there would be a substantial worsening of congestion related impacts (Impact T-4) that would occur in 2035 and a worsening of congestion-related impacts that would already be significant for Impact T-4 in 2050 under the proposed 2050
RTP/SCS. For other congestion related impacts (Impact T-5), there would be a substantial worsening in 2035 and 2050 under Alternative 3b. Alternative 3b reduces only one of the Project’s significant transportation impacts to less-than-significant levels (Impact T-3 in 2050), whereas it causes several of the Project’s less-than-significant transportation impacts to become significant: Impacts T-4 and T-5 in 2035, and Impact T-5 in 2050. Therefore, the transportation impacts attributable to Alternative 3b, on the whole, represent a greater impact than the 2050 RTP/SCS.

Also, Alternative 3b is financially infeasible. The 2050 RTP/SCS maximizes the investment in transit services based on projected funding that is eligible for transit projects for each of the phasing periods. More than half (56%) of the TransNet Early Action Program through 2015 (along with other local, state, and federal revenues it leverages) funds transit projects included in the 2050 RTP/SCS. For projects to move up in priority, other transit projects would have to be shifted to a later phasing period. This limited flexibility is further constrained by the annual allocation of most funds, which cannot be advanced. Regarding project priority, deferring a highway project in favor of a transit project is not always feasible given restrictions on how funds can be used. In situations where funds are flexible, funding could be spent on highway or transit projects. The proposed implementation priorities in the 2050 RTP/SCS reflect the goal to have a mixture of rail and bus transit improvements in each phasing period. Most of the highway expenditures included in the 2050 RTP/SCS are for managed lanes that will accommodate transit and carpools. Many of the highway facilities to be constructed in the next 10 years will serve transit routes. Additionally, SANDAG is limited by revenues restrictions for most funding sources. To the extent SANDAG could advance transit capital projects with flexible funds, additional operating dollars would be needed which are not contemplated as reasonably available funding in the revenue constrained plan.

Additionally, Alternative 3b is legally infeasible. The 2050 RTP/SCS land use pattern is based on existing local jurisdictions’ land use plans. For land use scenarios beyond the 20-25 year horizon of most general plans, each jurisdiction provided information for the forecast. Federal air quality conformity law requires RTPs to be based on the “most recent planning assumptions” at the time the conformity analysis begins. (40 CFR 93.110(a).) If the 2050 RTP/SCS provided a land use pattern that was substantially different from local general plans and planning assumptions, the RTP would be inconsistent with air quality conformity law, and the Draft EIR’s analysis of future conditions and impacts would not be realistic. Further, SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS or a more intensified land use pattern. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS. (Government Code §65080(b)(2)(J).

For the reasons described above, Alternative 3b is infeasible.

**Alternative 4: 2050 RTP/SCS Transportation Network/Modified Land Use**

**Description**

As described in detail in Section 6.2 of the EIR (Final EIR, p. 6-32), this alternative would implement the 2050 RTP/SCS transportation network together with the modified land use pattern described in Alternative 2b and 3b.
Findings and Rationale

The SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 4 infeasible and rejects this alternative for the reasons explained below:

As set forth in detail in Section 6.3 of the EIR, Alternative 4 (2050 RTP/SCS Transportation Network/Modified Land Use) has greater environmental impacts than the proposed Project in the following resource areas: (1) greenhouse gas emissions; and (2) population and housing. Alternative 4 has lesser environmental impacts than the proposed Project in the following resource areas: (1) aesthetics and visual resources; (2) agriculture and forest resources; (3) air quality; (4) biological resources; (5) cultural resources and paleontology; (6) geology, soils and mineral resources; (7) hazards and hazardous materials; (8) hydrology and water quality; (9) public services, utilities and energy; and (10) water supply. The impacts of Alternative 4 are generally the same for the resource areas of: (1) environmental justice; (2) land use; (3) noise; and (4) recreation.

As shown in Table 6.1-1 of the Final EIR, Alternative 4 meets all of the fundamental project objectives. However, it achieves some important project objectives to a lesser extent than the Project. These are described in Fundamental Objectives 2, 3 and 5 (above), and analyzed through Impacts T-1, T-2, T-4 and T-5. Fundamental Objective 2 states, in part “Provide a safe regional transportation system by: … Improving emergency preparedness.” Fundamental Objective 3 states, in part: “Provide a transportation system that offers convenient travel options for people and goods, as well as reasonable travel costs by: making system improvement to better connect people with jobs and activities.” Fundamental Objective 5 states, in part, “Provide a reliable transportation system that offers relatively consistent travel times by mode from day to day by: … managing the efficiency of the transportation system to improve traffic flow.” These differences are most apparent for years 2035 and 2050 and are show in EIR Table 6.4-1: Impacts Comparison.

The transportation impact of this alternative is complex and described in more detail below

Regional Growth/Land Use Change

There are important subregional differences between the 2050 RTP/SCS land use pattern and Alternative 4. This modified land use alternative would substantially lessen the significant impacts of the 2050 RTP/SCS caused by development-related ground disturbance in the eastern two-thirds of the County, while somewhat increasing these impacts in the more urban western third of the County. The modified land use pattern alternatives would not reduce the significant subregional impacts caused by development-related ground disturbance to less than significant levels, but they would substantially lessen these impacts subregionally in the eastern two-thirds of the County. Compared to the 2050 RTP/SCS, the modified land use alternatives would result in substantially less vacant land being developed in the region: 10,884 less acres by 2020, 79,739 less acres by 2035, and 86,156 acres by 2050.

There are also important regional differences between the 2050 RTP/SCS land use pattern and Alternative 4 in terms of public utilities, energy and water supply impacts. This modified land use pattern would substantially lessen the significant impacts of the 2050 RTP/SCS on wastewater facilities, storm water facilities, energy resources, and water supplies. Compact land use patterns have been shown both to decrease the demands for these public utilities, energy resources, and water supplies, and reduce or delay the need for construction of new or expanded facilities to meet these demands.
Transportation Network Improvements

Alternative 4 would implement the same transportation network as the 2050 RTP/SCS.

In general for the years 2020 and 2035, Alternative 4 would increase or maintain several 2050 RTP/SCS less than significant impacts related to travel times, and in 2050 increases 2050 RTP/SCS impacts related to travel times from less than significant to significant. In 2035 and 2050 this alternative also causes some congestion-related 2050 RTP/SCS impacts that are less than significant to become significant. These differences are shown in EIR Tables 6.3-1 through 6.3-7, Comparison of Alternatives (1, 2a, 2b, 3a, 3b, 4 and 5) to 2050 RTP/SCS and Table 6.4-1 Impacts Comparison: 2050 RTP/SCS and Alternatives Considered and are most apparent for years 2035 and 2050.

Conclusion

The environmental factors of highest priority to the Board that provide the greatest distinction between the Project and Alternative 4 relate to transportation. With Alternative 4, there would be a substantial increase in work and higher education trip travel time in 2050 compared to the 2050 RTP/SCS. (Impact T-2) Also, with Alternative 4 there would be a substantial worsening of congestion related impacts (Impact T-4) that would occur in 2035. For other congestion related impacts (Impact T-5), there would be a substantial worsening in 2035 and 2050 under Alternative 4. Alternative 4 does not reduce any of the Project’s significant transportation impacts to less-than-significant levels, whereas it causes several of the Project’s less-than-significant transportation impacts to become significant: Impacts T-4 and T-5 in 2035, and Impacts T-2 and T-5 in 2050. Therefore, the transportation impacts attributable to Alternative 4, on the whole, represent a greater impact than the 2050 RTP/SCS.

Also, Alternative 4 is legally infeasible. The 2050 RTP/SCS land use pattern is based on existing local jurisdictions’ land use plans. For land use scenarios beyond the 20-25 year horizon of most general plans, each jurisdiction provided information for the forecast. Federal air quality conformity law requires RTPs to be based on the “most recent planning assumptions” at the time the conformity analysis begins. (40 CFR 93.110(a).) If the 2050 RTP/SCS provided a land use pattern than was substantially different from local general plans and planning assumptions, the RTP would be inconsistent with air quality conformity law, and the Draft EIR’s analysis of future conditions and impacts would not be realistic. Further, SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS or a more intensified land use pattern. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS. (Government Code §65080(b)(2)(J).

For the reasons described above, Alternative 4 is infeasible.

Alternative 5: Slow Growth

Description

As described in detail in Section 6.2 of the EIR (Final EIR, p. 6-32), the alternative would implement growth-slowing policies, assuming that restrictive land use regulations and/or economic disincentives (such as increased taxes, development fees, and similar types of economically based actions) were applied to slow growth of both regional population and employment. Although
regional growth/land use change and transportation network improvements would be similar to the 2050 RTP/SCS, complete implementation would be delayed by 5 years.

Regional Growth/Land Use Change

Alternative 5 would implement the 2050 RTP/SCS Regional Growth Forecast land use, but at a slower pace than the 2050 RTP/SCS. Growth in population, housing and employment under this alternative would occur as follows:

<table>
<thead>
<tr>
<th>Year</th>
<th>Population</th>
<th>Housing</th>
<th>Employment</th>
</tr>
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<tbody>
<tr>
<td>2020</td>
<td>3,364,191</td>
<td>1,201,230</td>
<td>1,538,781</td>
</tr>
<tr>
<td>2035</td>
<td>3,870,000</td>
<td>1,369,807</td>
<td>1,752,630</td>
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<tr>
<td>2050</td>
<td>4,282,462</td>
<td>1,491,629</td>
<td>1,940,784</td>
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</tbody>
</table>

Transportation Network Improvements

Alternative 5 would implement the 2050 RTP/SCS transportation network, but at a slower pace than the 2050 RTP/SCS, with implementation of each improvement delayed for 5 years.

Findings and Rationale

Alternative 5 was identified as the environmentally superior alternative in the EIR, pursuant to CEQA Guidelines § 15126.6(e)(2). (Sec. 6.4). However, the SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 5 infeasible and rejects this alternative for the reasons explained below:

As set forth in detail in Section 6.3 of the EIR, Alternative 5 would have lesser environmental impacts than the proposed Project in the following resource areas: (1) aesthetics and visual resources; (2) agriculture and forest resources; (3) air quality; (4) biological resources; (5) cultural resources and paleontology; (6) environmental justice; (7) geology, soils and mineral resources; (8) greenhouse gas emissions; (9) hazards and hazardous materials; (10) hydrology and water quality; (11) noise; (12) population and housing; (13) public services, utilities and energy; (14) recreation; (15) transportation; and (16) water supply. Impacts for land use are the same as the Project.

Conclusion

Although the impacts associated with regional growth/land use change and transportation network improvements would be less at any given point in time (2020, 2035 and 2050) than the 2050 RTP/SCS, growth-slowing policies that restrict growth would result in additional growth and associated impacts in surrounding counties in southern California and northern Baja California (displaced growth). However, the location and magnitude of environmental impacts caused by this displaced growth are speculative and do not require further review in the Final EIR as indicated in CEQA Guidelines § 15145.

Moreover, provisions in SB 375 require that each region plan for its anticipated population growth and that the level of growth be consistent with projections produced by the California Department of Finance (DOF), with no more than +/- 3 percent deviation of the local projection from the DOF projection. For the San Diego region, SANDAG and DOF projections are shown in Table 4.11-5.
The SANDAG projections are lower than those from DOF, but if the projections were to be as low as in Alternative 5, the region would be outside the bounds of the +/-3 percent deviation allowed. Additionally, SB 375 requires that the Regional Housing Need Assessment (RHNA) and SCS be consistent, meaning that the SCS land use pattern can accommodate the 8-year RHNA Determination. A slow growth strategy would likely not accommodate the RHNA, creating another inconsistency with the requirements of SB 375. Thus, even if growth-slowing policies would be feasible for the San Diego region, such policies would render the SCS out of compliance with SB 375 and therefore legally infeasible.

The SANDAG projections are lower than those from DOF, but if the projections were to be as low as in Alternative 5, the region would be outside the bounds of the +/-3 percent deviation allowed. Additionally, SB 375 requires that the Regional Housing Need Assessment (RHNA) and SCS be consistent, meaning that the SCS land use pattern can accommodate the 8-year RHNA Determination. A slow growth strategy would likely not accommodate the RHNA, creating another inconsistency with the requirements of SB 375. Thus, even if growth-slowing policies would be feasible for the San Diego region, such policies would render the SCS out of compliance with SB 375 and therefore legally infeasible.

The SANDAG and Department of Finance Growth Projections Comparison

<table>
<thead>
<tr>
<th>Year</th>
<th>SANDAG Projections</th>
<th>DOF Projections</th>
<th>Numeric Difference</th>
<th>Percent Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>3,535,000</td>
<td>3,550,714</td>
<td>-15,714</td>
<td>-0.4</td>
</tr>
<tr>
<td>2035</td>
<td>4,026,131</td>
<td>4,100,681</td>
<td>-74,550</td>
<td>-1.8</td>
</tr>
<tr>
<td>2050</td>
<td>4,384,867</td>
<td>4,508,728</td>
<td>-123,861</td>
<td>-2.7</td>
</tr>
</tbody>
</table>

In addition, Alternative 5 is legally infeasible. The 2050 RTP/SCS land use pattern is based on existing local jurisdictions’ land use plans. For land use scenarios beyond the 20-25 year horizon of most general plans, each jurisdiction provided information for the forecast. Federal air quality conformity law requires RTPs to be based on the “most recent planning assumptions” at the time the conformity analysis begins. (40 CFR 93.110(a).) If the 2050 RTP/SCS provided a land use pattern than was substantially different from local general plans and planning assumptions, the RTP would be inconsistent with air quality conformity law, and the Draft EIR’s analysis of future conditions and impacts would not be realistic. Further, SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS or a more intensified land use pattern. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS. (Government Code §65080(b)(2)(J).

One of the fundamental project objectives is to provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns that accommodate the region’s future employment and housing needs, and protect sensitive habitat and resource areas. While Alternative 5 would protect sensitive habitat and resource areas, it would not provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns that accommodate the region’s future employment and housing needs because both jobs and housing growth would be restricted by slow-growth policies. Therefore, Alternative 5 would not meet this fundamental project objective.

For the reasons described above, Alternative 5 is infeasible.

D. ALTERNATIVES CONSIDERED IN EIR BUT REJECTED

This section discusses several alternatives that were presented to the SANDAG Board or raised in Notice of Preparation response letters. Reasons for rejected these alternatives include:

- Major elements of the alternative are already included in the RTP/SCS or one of the alternatives evaluated in detail in this EIR.
- The alternative is infeasible due to economic, legal, or other considerations.
• The alternative fails to reduce any of the RTP/SCS significant environmental impacts
• The alternative fails to meet one or more fundamental project objectives.

D1. PRELIMINARY NETWORK ALTERNATIVES PRESENTED TO THE SANDAG BOARD OF DIRECTORS

A multi-step process was used to develop preliminary network alternatives presented to the SANDAG Board of Directors through December 17, 2010. First, the 2050 Unconstrained Transportation Network was developed that fully meets the region's transportation needs. Subsequently, four financially constrained Scenarios that include all projects, programs, and services from the TransNet Extension Ordinance through 2048 were crafted from the Unconstrained Transportation Network. These Scenarios were developed taking into account the allowable uses of the projected local, state, federal, and private revenues anticipated through 2050. The intent in developing these four Scenarios was to compare and contrast the systemwide performance of networks that emphasize different mixes of projects, geographic distribution of projects, and modal choices. For example, both the Transit Emphasis and Fusion Scenarios propose substantial investments in LRT services; and while Transit Emphasis focuses on reinforcing and upgrading existing LRT routes, Fusion proposes new LRT routes to serve a wider geographic area. Highway Emphasis includes the highest investments in BRT and Rapid Bus services.

At its November 19, 2010, meeting, the Board discussed the performance of the initial four Scenarios (Transit Emphasis, Rail/Freight Emphasis, Highway Emphasis, and Fusion) and directed staff to create a revenue-constrained Hybrid Scenario merging the Fusion and Highway Emphasis Scenarios. Overall, the Hybrid scenario performed equally or better when compared to the other four revenue constrained scenarios. On December 17, 2010, the Board of Directors selected the Hybrid Scenario as the preferred Revenue Constrained Scenario (preferred RTP/SCS).

The following four transportation network scenarios were discussed by the Board of Directors on October 22, 2010, and November 19, 2010. The purpose of analyzing these scenarios was to enable the Board of Directors to consider alternate policy approaches for the plan. The following four scenarios represent variations of the 2050 RTP/SCS – including the same land use assumptions, phasing assumptions, and funding assumptions. Most funding that comes to the region, including the funding for projects identified in the local TransNet Extension Ordinance, is not readily transferable from one type of project (highway) to another (transit). While there is some flexibility to some of the funding anticipated to be available for projects through 2050, this only represents a small percentage of the total. The following four scenarios represent differing policy approaches to shifting that approximately three percent of the anticipated funding (flexible funding) to achieve different objectives (as described in each scenario).

• **Transit Emphasis.** Assumes all of the flexible funding available for transit services. The transit network in this Scenario is built on the dual philosophy of (1) reinforcing and upgrading existing transit services and (2) maximizing the overall number of transit projects in this Scenario that include a variety of rail, BRT, Rapid Bus, and local bus improvements. The rail projects included in this Scenario include the Downtown Trolley Tunnel in downtown San Diego to facilitate frequency enhancements for the Blue and Orange Trolley lines (7.5-minute all-day frequencies). Inclusion of the Downtown Trolley Tunnel also would enable implementation of express Trolley services on both the Blue and Orange Lines, which introduce “skip-stop” services to facilitate faster travel times for passengers making
longer distance trips along these corridors. This Scenario also would convert the Mid-City Rapid Bus service over time to a light rail transit (LRT) service to better serve the strong demand for transit in the Mid-City area. Complementing this LRT route along the east-west corridor between downtown San Diego and San Diego State University (SDSU) would be a north-south LRT service that would connect SDSU and Chula Vista via Mid-City, the southeastern San Diego communities, and National City. For the SPRINTER service, an extension of the line to South Escondido is included.

In terms of BRT and Rapid Bus services, a key capital project included in this Scenario is the Kearny Mesa Guideway in the SR 163 travel corridor to facilitate fast and direct access for a number of all-day BRT, peak period BRT, Rapid Bus, and local bus services to improve access to the residential and employment centers in downtown San Diego, Bankers Hill, Hillcrest, Mission Valley, Sharp/Children’s Hospital complex, and Kearny Mesa. Several other new BRT services would be implemented in the I-5, I-805, SR 52, and SR 78 freeway corridors that utilize the Managed Lanes/HOV system investments that facilitate high-speed travel to serve long-distance trip making demand in these areas. Also, 15 new Rapid Bus routes would be implemented along several key arterial corridors throughout the region.

Reintroducing streetcar and/or shuttle/circulator services to the region has generated strong interest at the Transportation Committee/Board level, and with SANDAG’s working groups and community members. The Transit Emphasis Scenario includes the two highest ranked streetcar projects – downtown San Diego, and Hillcrest/Balboa Park.

The highway network for this Scenario focuses on improvements that support the transit network, such as HOV and Managed Lanes, including all TransNet projects.

- **Rail/Freight Emphasis.** This alternative allocates additional funding towards rail-based transit projects, and the other to other projects that support goods movement. The transit network in this Scenario is built on maximizing the number of rail-based transit projects. In terms of light rail services, the Rail/Freight Emphasis Scenario (like the Transit Emphasis Scenario) includes the Downtown Trolley Tunnel to facilitate frequency enhancements for the existing Blue and Orange Trolley services, as well as express trolley services on both the Blue and Orange lines. In the Central and South County area, two new LRT lines would be implemented: Pacific Beach to El Cajon via Kearny Mesa, Mission Valley, and SDSU; and University Towne Centre (UTC) to Chula Vista via Kearny Mesa, Mission Valley, Mid-City, southeastern San Diego, and National City. In North County, this scenario includes an express SPRINTER service between Escondido and Oceanside, and the extension of the SPRINTER line to South Escondido. This is the only Scenario that includes the UTC COASTER Station and UTC Tunnel, providing a more direct connection for North County commuters into the University City area.

Due to the high capital costs of new rail projects and the UTC COASTER and Tunnel, additional new rail lines outlined in the Unconstrained Transit Network (SDSU to San Ysidro, UTC to Mira Mesa, Otay Mesa to Chula Vista, and the transition of the Mid-City Rapid to LRT) could not be included in the Rail/Freight Scenario. The emphasis on rail services in this Scenario means that most BRT and Rapid Bus services in the

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1 The Kearny Mesa Guideway would provide a dedicated transitway for BRT, Rapid Bus, and local bus services for a north-south travel corridor between downtown San Diego and Kearny Mesa in order to improve directness of travel and travel speeds, especially in the Hillcrest and Mission Valley areas.
Unconstrained Transportation Network are not included. The Kearny Mesa Guideway also is not included, resulting in longer travel times for the BRT and Rapid Bus that serve this corridor.

The highway network in this Scenario includes additional improvements beyond those included in TransNet to support goods movement in key corridors, such as additional capacity to SR 67, SR 94, and SR 905.

- **Highway Emphasis.** This alternative allocates all flexible funding toward the highway network. The transit network in this Scenario builds upon the Managed Lanes and HOV investment in the highway network, and as a result, includes all BRT, peak BRT, and Rapid Bus routes proposed in the Unconstrained Transportation Network. This scenario includes the Kearny Mesa Guideway to facilitate the BRT and Rapid Bus routes, but it does not include the Downtown Trolley Tunnel, and therefore it does not include any of the Trolley Express routes or the SPRINTER Express services.

With the exception of the Kearny Mesa Guideway in the SR 163 travel corridor between downtown San Diego and Kearny Mesa, BRT services are relatively inexpensive to implement since they utilize already planned Managed Lanes/HOV facilities. There is no Managed Lanes/HOV facility proposed for the SR 163 corridor, thus resulting in the need for a separate transit guideway. As a result, the capital costs of the BRT routes are limited primarily to station improvements, vehicle acquisition, and associated maintenance facilities. These relatively low capital costs allow a higher number of transit projects to be included in this Scenario than otherwise might be expected, including all Rapid Bus projects and two light rail projects (SDSU to San Ysidro and UTC to Mira Mesa).

The Highway Emphasis highway network is the most aggressive in adding highway capacity. Of all of the Scenarios, it builds the most of the Unconstrained Highway Network, including all TransNet projects. Improvements include additional lanes on I-5, I-8, SR 52, SR 54, SR 56, SR 67, SR 76, SR 94, SR 125, SR 163, I-805, and SR 905.

- **Fusion.** The Fusion Scenario allocates additional funding towards transit services highways, and toward rail grade separations in support of the local streets and roads. This Scenario attempts to reflect the results from a statistically reliable survey that was conducted earlier this year as part of the 2050 RTP planning process, which indicated that the voting public is interested in enhancing existing transit services, pursuing new transit services, addressing bottlenecks on freeways, and addressing local road issues.

The transit network in this Scenario focuses a blend of enhancements to the existing transit system and new transit services. Unlike the implication of the title, the transit network in the Fusion Scenario is not necessarily a “merging” of all of the projects in the other three Scenarios. Rather, this Scenario attempts to reflect a combination of existing and new transit projects that could resonate particularly well with the public.

The new transit projects that would be implemented in this Scenario include the Kearny Mesa Guideway to facilitate new BRT and Rapid Bus services in the SR 163 travel corridor, and new LRT projects aimed at providing trolley service to a wider geographic service area, including LRT lines in the following corridors: Pacific Beach to El Cajon via Kearny Mesa and Mission Valley; UTC to Mira Mesa via Sorrento Mesa; and UTC to Chula Vista via Kearny Mesa, Mission Valley, Mid-City, southeastern San Diego, and National City; and extension of the SPRINTER line to South Escondido. It also includes SPRINTER
Express service, with stops at the Oceanside, Vista, and Escondido Transit Stations. This approach differs from the Transit Emphasis Scenario in that it focuses more attention on new LRT lines versus improvements to existing LRT lines. As such, it does not include the Downtown Trolley Tunnel included in the Transit Emphasis Scenario that would enable express trains on the Blue and Orange Trolley Lines. It also focuses less attention on Rapid Bus services (the Fusion Scenario includes six Rapid Bus services versus 15 included in the Transit Emphasis Scenario). This Scenario includes implementation of the highest number of streetcar and/or shuttle/circulator services.

The Fusion highway network provides a number of HOV and Managed Lanes improvements in addition to key operational improvements to relieve bottlenecks and congestion and includes all TransNet projects.

Reasons for Rejection: These four alternatives (scenarios) were rejected for detailed consideration in the EIR because major elements of these alternatives are included in the proposed RTP/SCS and alternatives evaluated in detail in this EIR.

Unconstrained Funding Alternative – This alternative represents the region’s vision for transit, highway, goods movement, arterial, bicycle, transportation demand management (TDM), and transportation systems management (TSM) improvements and operations to meet travel demand in 2050. The Unconstrained Alternative fully implements all of the transit, highway, goods movement, arterial, bicycle and pedestrian projects in the region by 2050. The Unconstrained Alternative also fully implements the TDM and TSM improvements and programs.

Reasons for Rejection: The Unconstrained Network was rejected for detailed consideration because it is not based on reasonable revenue availability and is therefore not economically or legally feasible. Consistent with 23 CFR section 450.322 (b) (11), SANDAG is required to prepare an RTP that is revenue constrained. The unconstrained transportation needs for the San Diego region would total over $150 billion. This represents a deficit of nearly $38 billion over what is reasonably expected to be available over the time horizon of the plan. Also, this alternative was rejected for detailed consideration because it would not avoid or substantially reduce any of the RTP/SCS significant environmental impacts, and because major elements of this alternative are included in the proposed RTP/SCS evaluated in detail in this EIR.

Extreme Phasing Alternative – This alternative assumes all funding is shifted to early phases of system development for:

- Transit-only projects (from the Unconstrained Network). Highway and roadway projects would not be built until the latest project phase;
- Highway-only projects (from Unconstrained Network). Only transit projects that use the highway improvements (Managed Lanes) would be built.

Reasons for Rejection: The Extreme Phasing Alternative was rejected for detailed consideration because it is not based on reasonable revenue availability and is therefore not economically or legally feasible. Consistent with 23 CFR section 450.322 (b) (11), SANDAG is required to prepare an RTP that is revenue constrained, and the RTP cannot include projects that are not based on reasonable revenue projections. Further, SANDAG did analyze alternatives in the EIR that does modify the phasing of projects to advance transit projects to earlier phases of the program and modify the TransNet expenditure plan to shift projects from highway construction to transit projects and operations. See Alternatives 2a, 2b, 3a, and 3b.
D2. ALTERNATIVES RAISED IN NOTICE OF PREPARATION LETTERS

*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.

Reasons for Rejection: Major elements of the alternative are already included in the 2050 RTP/SCS and/or one of the alternatives evaluated in detail in this EIR. See Alternative 2a and 2b.

*Modified Freeway Network Alternative*

The Modified Freeway Network Alternative would evaluate decreased discretionary freeway funds and their reallocation to transit system improvements.

Reasons for Rejection: This specific alternative was rejected for detailed consideration because it is legally infeasible. SANDAG does not have the discretion to utilize funds allocated for highway construction (including planning, environmental review, and/or engineering) for other purposes. Such reallocations would require actions by Congress or federal funding agencies that are speculative and not reasonably foreseeable. Also, this alternative was rejected for detailed consideration because SANDAG has analyzed the legally feasible flexibility of funding anticipated to be available through 2050, and included funding options to maximize funding for transit projects in Alternatives 2a and 2b.

*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.

Reasons for Rejection: This alternative was rejected for detailed consideration because major elements of the alternative (privately funded toll roads and streetcars) are included in the 2050 RTP/SCS. Also, this alternative was rejected because it addresses just one component of the 2050 RTP/SCS (transportation facility ownership), and is not a fully integrated alternative that meets the fundamental 2050 RTP/SCS objectives.

*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.

Reasons for Rejection: This alternative was rejected for detailed consideration because major elements of the alternative are included in Alternatives 3a and 3b, which modify the phasing of the projects to advance transit projects in the early phase of the program.
**Unconstrained Revenue Alternative**

The Unconstrained Revenue Alternative would analyze the construction of all infrastructure projects without regard as to their economic feasibility.

Reasons for Rejection: For reasons this alternative was rejected from detailed consideration, see the discussion of the Unconstrained Funding alternative above.

**Bicycle Alternative**

The Bicycle Alternative would prioritize funding for bicycle transportation projects based on their ability to reduce driving.

Reasons for Rejection: Major elements of the alternative are already included in the RTP/SCS. The 2050 RTP/SCS includes full funding for the unconstrained bicycle (regional and local) network. Also, this alternative was rejected because it addresses just one component of the 2050 RTP/SCS (bicycle transportation), and is not a fully integrated alternative that meets the fundamental 2050 RTP/SCS objectives.

**Deep Market Penetration of Alternative Fuel Vehicles**

The RTP EIR should analyze an alternative that included deep market penetration and fleet transformation of low and zero emissions vehicles (beyond those assumed by CARB in standard assumptions).

Reason for Rejection: The alternative is legally infeasible because SANDAG has no authority to require deep market penetration and fleet transformation of alternative fuel vehicles beyond that required by CARB. Also, this alternative was rejected because it addresses just one component of the 2050 RTP/SCS (low and zero emissions vehicles), and is not a fully integrated alternative that meets the fundamental 2050 RTP/SCS objectives.

**IX. FINDINGS REGARDING MITIGATION MEASURES AND ALTERNATIVES PROPOSED IN COMMENTS**

Several comments on the Draft EIR suggested additional mitigation measures and/or project alternatives. The Final EIR incorporates some of these mitigation measures. However, where the suggestions requested minor modifications in adequate mitigation measures, requested mitigation for impacts that the Draft EIR determined were less than significant, requested mitigation for impacts for which the Draft EIR already identified measures that would reduce the impact to less than significant, or requested mitigation measures or alternatives that were too vague or speculative to be addressed, these requests were declined as unnecessary. The SANDAG Board of Directors adopts and incorporates by reference the specific reasons for declining such measures contained in the responses to comments in the Final EIR as its grounds for rejecting these measures.

Additionally, certain mitigation measures and alternatives suggested in comments could reduce impacts that would otherwise be significant, but implementation of these mitigation measures and alternatives would be infeasible. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the following mitigation measures or project alternatives identified in the final EIR, for the reasons explained below.
A. SUGGESTED MITIGATION MEASURES

Draft EIR comment Letter J (Endangered Habitat League) regarding biological resources and land use planning:

Endangered Habitat League Suggested Mitigation Measure #1 (Comment J5, paragraph 3)

In its August 1, 2011 comment letter on the Draft EIR, the Endangered Habitat League stated: “Here, it is unclear whether SANDAG is assuming any responsibility to implement biological mitigation or whether it is wholly deferred to ‘other implementing agencies.’ If it is the latter, then SANDAG must so state, and also disclose that it is not valid mitigation because its implementation is purely speculative. If it is the former, then SANDAG must commit in the measure to make it part of the project, that is, to show how SANDAG will use its existing authority to ensure that the project will not go forward without the mitigation. For example, SANDAG could stipulate that road projects in the RTP will not proceed to funding through the RTIP process (over which SANDAG has authority) unless the implementing agency has demonstrated to SANDAG that any conflicts with conservation plans have been eliminated, or reduced to the maximum extent feasible and compensated for as specified in the PEIR’s biological mitigation measures. The mitigation measures must therefore be revised to make SANDAG’s responsibilities transparent.”

Findings and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the revisions to the biological mitigation measure(s) suggested above. Please see Master Response #4 regarding the respective obligations of SANDAG and other agencies to implement proposed mitigation measures. SANDAG will commit to and implement those feasible mitigation measures that are within its responsibility and jurisdiction by making the finding that its mitigation measures “have been required in, or incorporated into, the project.” (Public Resources Code §21081(a)(1); CEQA Guidelines §15092(a)(1).) These include mitigation measures implemented through future regional planning efforts, as well as by a limited number of second-tier transportation projects that SANDAG directly approves or carries out.

As explained in the Draft EIR, CEQA provides that an EIR can include feasible mitigation measures that are within the responsibility and jurisdiction of another agency. The appropriate CEQA finding in such instances is that such mitigation measures have been or “can and should” be adopted. (Public Resources Code §21081(a)(2); CEQA Guidelines §15092(a)(2).) When this finding is made, there is no further requirement that SANDAG find that mitigation measures that are within the responsibility and jurisdiction of another agency have been incorporated into the project. That finding is reserved for mitigation measures within SANDAG’s responsibility and jurisdiction.

Regarding the commenter’s specific mitigation request, that SANDAG not fund transportation projects unless conflicts with conservation plans were eliminated or substantially reduced, when SANDAG is a pass-through agency for funding, it is the funding agency’s responsibility to place conditions on grant funding, and it is legally infeasible for SANDAG to place additional conditions on funding since it does not have the discretionary authority to do so. When SANDAG is the direct source of funding (versus a pass-through agency), SANDAG will require as a grant condition the implementation of those 2050 RTP/SCS mitigation measures, including Mitigation Measure BIO-R, that are applicable to, and feasible for, the project type being funded.
Draft EIR comment Letter L (Preserve Calavera) regarding greenhouse gas emissions and public services, utilities and energy

Preserve Calavera Suggested Mitigation Measure #1 (Comment L54)

In its August 1, 2011 comment letter on the Draft EIR, Preserve Calavera stated: “GHG-C is one where SANDAG should impose more controls on local jurisdiction compliance (through withholding funds for non-compliance) but also could be of great assistance by preparing standard language and project conditions that would make it easy for local jurisdictions to just insert in their local documents.”

Findings and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the revisions to mitigation measure GHG-C suggested above. The suggestion for development of standard GHG emissions language and project conditions is not feasible as the circumstances and conditions of individual future projects are unique and different. Some project conditions may not be appropriate or applicable to individual projects as they are evaluated and designed. Additionally, the topic of GHG emissions is very dynamic and continually changing as new information and regulations emerge. Standard language or project conditions that seem adequate now may become outdated very quickly due to new information or technology.

Please refer to Master Response 4 for a discussion of mitigation measures that are within the jurisdiction and responsibility of other agencies to implement, and Master Response 21 for a discussion of GHG mitigation.

When SANDAG is a pass-through agency for funding, it is the funding agency’s responsibility to place conditions on grant funding, and it is legally infeasible for SANDAG to place additional conditions on funding since it does not have the discretionary authority to do so. When SANDAG is the direct source of funding (versus a pass-through agency), SANDAG will require as a grant condition the implementation of those 2050 RTP/SCS mitigation measures, including GHG mitigation measures, that are applicable to, and feasible for, the project type being funded.

Preserve Calavera Suggested Mitigation Measure #2 (Comment L63)

In its August 1, 2011 comment letter on the Draft EIR, Preserve Calavera stated: “There needs to be a more direct tie between land use changes that support population/jobs growth and the related necessary growth in parkland. There should be a specific requirement to make this happen and tie transportation funding release to achievement of required parkland/open space standards. Without such a connection this remains a significant unmitigated impact.”

Findings and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the suggested mitigation measure(s) above. SANDAG does not have the land use authority to ensure that the appropriate amount of land is set aside for park and recreation use in local jurisdictions. Additionally, many jurisdictions, especially highly built out coastal communities, have a limited amount of land available to serve as parkland.
Draft EIR comment Letter Q (Sierra Club letter #2) regarding GHG emissions

Sierra Club #2 Suggested Mitigation Measure #1 (Comment Q6)

In its August 1, 2011 comment letter on the Draft EIR, the Sierra Club stated: “An example of legal mitigation [for GHG] would be the adoption of a SANDAG policy that it will fund no highway construction or maintenance within a municipality until specific strategies, such as unbundling the cost of car parking, that have been found to give the needed driving reductions, are enacted and are being enforced.”

Finding and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measure(s) suggested above. See EIR Master Response 4 regarding mitigation measures that are the responsibility and jurisdiction of other agencies to implement. When SANDAG is a pass-through agency for funding, it is the funding agency's responsibility to place conditions on grant funding, and it is legally infeasible for SANDAG to place additional conditions on funding since it does not have the discretionary authority to do so. When SANDAG is the direct source of funding (versus a pass-through agency), SANDAG will require as a grant condition the implementation of those 2050 RTP/SCS mitigation measures, including GHG mitigation measures, that are applicable to, and feasible for, the project type being funded.

Sierra Club #2 Suggested Mitigation Measure #2 (Comments Q10, Q11)

In its August 1, 2011 comment letter on the Draft EIR, the Sierra Club provided the following figure consisting of the following text:

Presented Feasible Mitigations to Achieve Driving Reductions that will Support S-3-05 Strategies to Achieve 35%

- Stop expanding freeways
  - No need, because we must drive less
  - Eliminate congestion with following strategies
- Reallocated freeway expansion funds to transit
- Pricing to increase fairness & choice
  - Parking demonstration projects to unbundle cost
  - State legislation
    - Unbundle the cost of all “free” parking
    - Equitable and environmentally-sound road-use fee pricing
- Smart growth, complete streets, bicycle education

The ideas in Figure 4 are repeatedly presented to the SANDAG Board.
Note that detail, such as requiring unbundling, on the part of municipal governments, as a condition of some advantage, such as receiving TransNet dollars to pave streets, is left off the ideas shown in Figure 4 by the Sierra Club."

Finding and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measure(s) suggested above. The measure is rejected as infeasible for the following reasons, also set forth in Master Responses 2, 9, 11, 15, 17, 20, and 21 and Response to Comment Q-16:

Master Response 21

- Measures within the 2050 RTP/SCS and GHG mitigation measures in the Final EIR are consistent with recommendations from the State Attorney General
- Local agencies other than SANDAG are already implementing GHG mitigation measures in the Final EIR through adopted Climate Action Plans (CAPs) or are in the process of preparing CAPs
- The development of detailed mitigation measures, and quantification of their effectiveness in reducing project-specific GHG emissions, is properly deferred to future project-specific CEQA reviews under SANDAG Program EIR.
- Mitigation measures other than those contained in the SANDAG 2050 RTP/SCS EIR were not selected because: 1) SANDAG is not always the direct source of funding and cannot always apply mitigation conditions to receipt of funding; 2) tying GHG reductions to VMT performance measures as mitigation is infeasible when factors other than VMT affect GHG emissions; 3) increasing transit mode share as mitigation is infeasible for levels of transit funding that exceed the level planned in the 2050 RTP/SCS; and 4) mitigation tying reductions in VMT and increases in transit mode share do not correlate directly to similar reductions in GHG emissions.

Master Response 2

- The role regional land use and transportation strategies can or should play in achieving the 2050 emission reduction target identified by Executive Order 2-3-05 is not defined in the Executive Order or other laws.
- SANDAG recognizes the aspirational nature of the EO S-3-05 2050 target, but the 2050 RTP/SCS emissions reductions are not legally required to be consistent with this target.

Master Response 20

- The EIR GHG emissions analysis within the EIR is based on the 2050 RTP/SCS future land use, transportation projects, and population and employment data.
- The general process by which GHG emissions were estimated included running the transportation computer package TransCAD 5.0, which includes trip distribution, trip lengths, speed, and other factors.
• GHG emissions associated with the VMT output from TransCAD were estimated using the most up-to-date CARB emissions inventory model available at the writing of the DEIR, Emission Factors (EMFAC) 2007

Master Response 17

• Restrictions on how transportation funds can be used prevent SANDAG from making major shifts in funding from highway projects to transit. This limited flexibility is further constrained by the annual allocation of most funds, which cannot be advanced.

• For projects to move up in priority, other transit projects would have to be shifted by SANDAG to a later phasing period. This limited flexibility to expedite transit project funding is further constrained by the annual allocation of most funds, which cannot be advanced.

Master Response 11

• SANDAG’s ability to implement local agency policies, such as those related to parking is limited by SB 375 which specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies to be consistent with an RTP/SCS

Master Response 15

• Because SANDAG has no independent authority to require local governments or the California Coastal Commission to implement a coordinated regional parking fee program developed by SANDAG, this type of mitigation measure is considered legally infeasible.

Master Response 9

• The proposed Final 2050 RTP/SCS has been revised to include Complete Streets supportive language, supporting the intent of AB 1358.

• SANDAG’s existing programs that support Complete Streets include the Active Transportation and Smart Growth Incentive grant programs, Complete Streets Education Program from the Regional Bicycle Plan, and the TransNet Routine Accommodations policy. Complete streets training is a proposed program element in SANDAG’s Regional Bicycle Plan.

• While these programs support the intent of AB 1358 (2008), the legislation is implemented only through amendment of general plan circulation elements to include Complete Streets policies, and does not impose any legal requirements on SANDAG.

Response to Comment Q-16

• The 2050 RTP/SCS fully funds the Regional Bicycle Plan, which establishes a regional bicycle network and prioritizes investments where the greatest ridership is anticipated. While the regional network would be fully funded through the plan, funds also would be available to assist the local jurisdictions with implementation of the local bicycle networks.

• The 2050 RTP/SCS also includes a discussion of Transportation Demand Management (TDM) strategies, which include iCommute and bicycle education programs. This includes subsidies for the Guaranteed Ride Home (GRH) program, which is a safety net for
commuters who carpool, vanpool, take an Express Bus, ride the COASTER, or walk or bike to work three or more times per week. The 2050 RTP/SCS continues these programs, and iCommute intends to launch more programs that increase bicycling to support the Regional Bicycle Plan (2050 RTP/SCS, Chapter 6).

B. SUGGESTED PROJECT ALTERNATIVES

The EIR evaluated a reasonable range of alternatives to the proposed project. The seven alternatives evaluated in detail in Chapter 6 of the EIR included features suggested by the public, such as a greater emphasis on transit projects, moving transit projects earlier in priority, and planning for a modified, more compact land use pattern. When considering whether the range of alternatives evaluated in the EIR is adequate, several principles apply. The “discussion of alternatives need not be exhaustive,” and the requirement to discuss alternatives is “subject to a construction of reasonableness.” (Residents Ad Hoc Stadium Committee v. Board of Trustees (1979) 89 Cal.App.3d 274, 286.) “An EIR need not consider every conceivable alternative to a project.” (CEQA Guidelines §15126.6(a.).)

Under CEQA, absolute perfection is not the standard governing a lead agency's proposed range of project alternatives. Rather, in preparing an EIR, a lead agency need only make an objective, good faith effort to provide information permitting a reasonable choice of alternatives that would feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening the project's significant adverse environmental impacts. (California Oak Foundation v. Regents of University of California (2010) 188 Cal.App. 4th 227, 275-276.)

Draft EIR comment Letter B (California Department of Fish & Game) regarding biological resources

CDFG Suggested Alternative #1(Comment B30)

In its July 27, 2011 comment letter on the Draft EIR, CDFG stated: “The 2050 RTP/SCS impacts existing preserve systems and wildlife corridors by encroaching on the existing preserve areas, narrowing wildlife movement corridors and disturbing these areas during construction (and long-term operational project phase). Although roadway and railway improvements are allowed within preserve areas if they are preexisting, an alternative which reduces the need to expand them is a preferable one and should be at the forefront of planning and design.”

Finding and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above. The alternatives analysis presents a comparison of the potential conflicts with preserved areas and biological planning efforts and identifies multiple alternatives that would result in less significant impacts than the 2050 RTP/SCS as outlined in Table 6.4-1, including Alternatives 2a, 2b, 3b, 4 and 5. The DFG-suggested alternative is a variation of these alternatives, which the Draft EIR evaluated in detail. CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in a Draft EIR. “[W]hat is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” (Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County (1982) 134 Cal.App.3d 1022, 1029.) As described in Section VIII of these Findings (Findings Regarding Alternatives Evaluated in EIR), Alternatives 2a, 2b, 3b, and 4 have been rejected, in part because they each result in greater transportation and traffic congestion impacts than the 2050 RTP/SCS, conflicting with several
fundamental project objectives. Alternative 5, which is based on slow-growth policies, would render the SCS out of compliance with SB 375 and is therefore, legally infeasible. Since the DFG-suggested alternative would lessen the expansion of roadway and railway improvements within preserve areas, it would also result in greater travel congestion impacts than the 2050 RTP/SCS since existing roadways and railways within preserves could not be further improved, conflicting with several fundamental project objectives.

Also, the EIR includes mitigation measures regarding conflicts with wildlife and habitat conservation planning efforts that may result from the 2050 RTP/SCS, and these been revised to include information regarding conflicts with hardline preserves. As stated in EIR Section 4.4.6, Mitigation Measures BIO-Q and BIO-R reduce conflicts to a level less than significant though requiring biologically equivalent or superior compensation when and if such conflict arise at the project level. Under *Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515,520-521, a lead agency need not make CEQA findings on the feasibility of an alternative if it adopts mitigation measures that avoid or substantially lessen a project’s significant environmental effects.

**CDFG Suggested Alternative #2 (Comment B28)**

In its July 27, 2011 comment letter on the Draft EIR, CDFG stated: “The alternatives described in the 2050 RTP/SCS involve various combinations of the ‘Modified Funding’ and ‘Modified Land Use’ strategies, and includes an increased transit services proposal that would provide more frequent buses, light rail and rail service. The Department believes that a planning strategy for consideration should include concentrating development, phasing transit projects earlier, and providing more frequent transit service, thereby reducing the need to expand other existing infrastructure (i.e., freeways) and consequently leading to the retention of a larger amount of undeveloped land.”

**Findings and Rationale**

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative(s) identified above. The Final EIR evaluates a reasonable range of alternatives, as explained fully in Master Response 16. As explained in Chapter 6, seven alternatives to the proposed project were evaluated in detail, including alternatives with features suggested by the public. The alternatives evaluated included several that incorporated features consistent with the recommendations in this comment, such as a greater emphasis on transit projects, moving transit projects earlier in priority, and planning for a modified, more compact land use pattern. CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in a Draft EIR. “What is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.)

As described in Section VIII of these Findings (Findings Regarding Alternatives Evaluated in EIR), Alternatives 2a, 2b, 3a, 3b, and 4 have been rejected, in part because they would each result in greater transportation and traffic congestion impacts than the 2050 RTP/SCS, conflicting with several fundamental project objectives. In addition, Alternatives 2a and 3a have been rejected because they are financially infeasible, while Alternatives 2b and 3b are both financially and legally infeasible. Alternative 4 has also been rejected because it is legally infeasible. Alternative 5 which is based on slow-growth policies would render the SCS out of compliance with SB 375 and is therefore, legally infeasible. Since the DFG-suggested alternative would lessen the expansion of
existing infrastructure, it would also result in greater travel congestion impacts than the 2050 RTP/SCS since existing roadways and railways within preserves could not be further improved, conflicting with several fundamental project objectives.

**Draft EIR comment Letter K (Move SD) regarding use of transit and VMT reduction**

**Move San Diego Suggested Alternative #1 (Comment K4)**

In its August 1, 2011 comment letter on the Draft EIR, Move San Diego stated: “Move San Diego requests SANDAG review the newly revised FAST Plan, prepared independently by Move San Diego's team of expert consultants. (See Attached, FAST plan dated June 30, 2011). It contains ideas and strategies on how to think differently about the future of regional and local rapid transit options that will save money, reduce operating costs and help SANDAG meet long term sustainability goals by increasing transit ridership in urban corridors. The revised 2011 FAST plan summary is attached for your convenience and for the public record. The tight timeline SANDAG is working with for RTP adoption may in fact preclude a full evaluation of the revised FAST plan for this iteration of the RTP. However, as the RTP is an ever changing document, and in accordance with this recommendation in the DEIR, ‘SANDAG shall and implementing agencies should coordinate with cities and San Diego County early in the planning process for [transportation] facilities to identify potentially significant land use impacts and address them through the facility planning and design process’ we request SANDAG and its partner cities review the transit projects and tools presented in the FAST plan in order to meet the region's mobility goals in a cost effective manner.”

**Findings and Rationale**

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternatives(s) identified above. As described below and in Master Response 17, the FAST Plan has many similarities to the transit components of the 2050 RTP/SCS, but does not meet the fundamental objectives of the 2050 RTP/SCS, and there is no evidence that the FAST Plan reduces significant environmental impacts of the 2050 RTP/SCS.

**FAST Plan Overview.** As described in Section 1 of the FAST plan (page 6), the FAST plan was designed with one overarching goal: attracting a significantly larger share of choice riders to transit. Another important goal of the plan is to support existing urban form, as well as future development. The FAST plan is a transit-only plan composed of two major elements: transit services and right-of-way infrastructure (Section 4). It also includes numerous specific transit projects (Section 5) and transit routes (section 6). It does not address highway improvements or the SCS. The FAST plan was not included in the EIR reasonable range of alternatives for several independent reasons.

**Inability to Meet Fundamental Project Objectives.** The FAST plan was not included in the EIR reasonable range of alternatives because it was unable to meet most of the fundamental project objectives. It is an alternative to one component of the 2050 RTP/SCS, e.g., transit, rather than a comprehensive alternative addressing the SCS and highway network improvements as well as transit. The FAST plan does not present any proposed highway network improvements as an alternative to the proposed 2050 RTP/SCS highway improvements, and does not present different land use patterns as an alternative to the SCS. To be legally adequate under federal transportation law and SB 375, the 2050 RTP/SCS is required to address transit projects, highway projects, and sustainable land use patterns; all three components are integrated into the
fundamental project objectives described in EIR Section 2.0.3 (pages 2-10 and 2-11). These
goals are listed below, together with explanations of why the FAST plan does not meet them.

1) Provide an environmentally sustainable transportation system and SCS that foster efficient
concentrated land development patterns. The FAST plan does not address the complete
transportation system (highways as well as transit), and does not provide an alternative
land use pattern to the SCS.

2) Provide a safe regional transportation system. The FAST plan does not address highway
safety, bicycle safety, or pedestrian safety as separate elements. Under SAFETEA-LU,
safety must be a crucial component and goal of the Regional Transportation Plan (RTP).
The focus of transportation safety has been integrated in all transportation modes and
within multiple facets of the 2050 RTP development process including the refinement of
transportation project evaluation, as well as the development of plans and programs such as
Safe Routes to Transit, Safe Routes to Schools, the San Diego Regional Bicycle Plan,
Transportation Demand Management (TDM), and Public Safety, all of which are part of the
2050 RTP/SCS.

3) Provide transportation system that offers convenient travel options and reasonable travel
costs. Again, the FAST plan does not address travel options other than transit that are
included in the 2050 RTP/SCS such as single occupant driving, carpooling/vanpooling,
bicycling, and walking and the role each plays in creating a comprehensive transportation
plan.

4) Provide transportation system that support's improvement of region's standard of living.
The FAST plan does not provide a complete transportation system, just transit systems

5) Provide reliable transportation system that offers relatively consistent travel times by mode
from day to day. The FAST plan addresses just one transportation mode, transit.

6) Provide equitable levels of service. The FAST plan does not address equitable levels of
service for transit or for highways.

The FAST Plan Has Many Similarities to the Transit Components of the 2050 RTP/SCS.
CEQA does not require the consideration of multiple variations of the same alternative. The FAST
Plan indicates that an effective transit system needs to address several critical design factors (see
Section 3):

- **Network Structure**: does the transit service network connect enough of the right locations
  without requiring transfers?
- **System Performance**: are most transit trips competitive with the car? That is, can you get
  there roughly in the same time as a solo driver?
- **Customer Experience**: what is the walking and waiting environment like getting to and
  from transit? What kind of information is available for customers to make the system easy
  to use? Are the transit vehicles clean and appealing?

The FAST Plan addresses these design factors through a system of Quickways and other bus
guideway projects: the 2050 RTP/SCS transit component also addresses these design factors
through a mixture of rail, BRT, and Rapid Bus projects. The objectives of the two transit
approaches, to address several critical design factors, match fairly well. The two transit
approaches differ in the specific types of transit modes and transit network design details to
accomplish them.
More specifically, Figure 6.9 of the FAST Plan (page 66) illustrates the overall FAST plan network. The 2050 RTP/SCS transit component achieves a similar level of network connectivity and high speed service as the FAST plan through a different network design of LRT (improvements to existing rail lines and several new corridors) and BRT services that utilize the Managed Lanes system. By comparison, for each of the geographic areas shown in Figure 6.9, the 2050 RTP/SCS LRT/BRT provides a more extensive infrastructure network than does the FAST Plan Major Quickway/Transitway project plan, as follows:

- **North County** – improved Coaster service frequencies and improved connectivity with the UTC/Sorrento Mesa area
- **Central County** – I-15 BRT connecting Escondido, north I-15 corridor, Kearny Mesa, and the connecting to points in the Urban Core areas along the I-15 corridor using the Managed Lanes facility that includes Mission Valley, Mid-City and Downtown San Diego; I-15-UTC BRT that connects the north I-15 corridor with Sorrento Mesa/Tech Center, UTC, UCSD in the short term that would be converted to LRT in the long range.
- **Urban Spine**: in the RTP plan, the urban spine focuses on the I-15, I-805, and SR 163 corridors rather than a single urban spine facility in the FAST Plan---for the SR 163 corridor, Rapid Bus would connect Kearny Mesa, Sharp Hospital, Fashion Valley, Uptown, 5th Ave, and Downtown via arterial transit priority measures; in the I-15 corridor, the I-15 BRT as previously mentioned; in the I-805 corridor, a BRT line initially and long term a LRT line that would connect the Central County areas of UTC/UCSD to Kearny Mesa, and to Urban Spine areas along the I-805/I-15 north-south corridors not included in the FAST Plan Quickway/Transitway Plan (Mission Valley, Mid-City/Centerline, Southeastern SD) and South Bay areas to the Otay Mesa Border; for access to the airport, the main access point would be shifted to the north side of Lindbergh Field to provide direct access to existing trolley, Coaster, Amtrak, and the future high-speed rail line.
- **Mid-Coast** – in addition to the Mid-Coast LRT line that provides direct connections from the Mid-Coast corridor to downtown San Diego and the South Bay areas, an LRT line directly connecting Pacific Beach with the Central County areas of Kearny Mesa, connections to the I-15 corridor urban spine services in Mission Valley, and also to East County areas including SDSU and El Cajon
- **East County** – in addition to the existing Orange and Green LRT lines, an LRT line that would connect downtown San Diego with Uptown, Mid-City/Centerline, and SDSU.
- **South Bay** – In addition to the exiting Blue Line LRT, an LRT line that would connect South Bay (San Ysidro, Chula Vista, National City along the I-5 corridor) to the Urban Spine areas along the I-805/I-15 corridors (Southeastern SD, Mid-City/Centerline, Mission Valley), and Central County areas (Kearny Mesa, UTC/UCSD); two BRT lines via Managed Lanes facilities that connect 1) Otay Mesa border, Otay Ranch, Chula Vista, National City to downtown and, 2) Otay Mesa border, Otay Ranch, Chula Vista, National City to Urban Spine areas in the I-15/I-805 corridor (Southeastern SD, Mid-City/Centerline, Mission Valley) and Central County areas (Kearny Mesa, UTC/UCSD).

**No Evidence that the FAST Plan Reduces the 2050 RTP/SCS Significant Environmental Impacts.** The EIR must analyze alternatives that avoid or substantially reduce the proposed project’s impacts. (CEQA Guidelines §15126.6.) A lead agency is not required to consider potential alternatives that would not reduce the significant environmental impacts of the project as proposed. (See Tracy First v. City of Tracy (2009) 177 Cal.App.4th 912, 928-930.) There is no evidence that the FAST Plan, submitted in the Move SD comment letter as an alternative, would
avoid or substantially reduce any of the 2050 RTP/SCS significant environmental impacts. The FAST plan includes the construction of different transit projects at different locations than the 2050 RTP/SCS; however, at a programmatic level, impacts from transit project construction would likely be similar under either transit approach. To the extent that the FAST plan relies on Quickways, which rely on tunneling and aerial structures, some environmental impacts could actually be worse than the transit component of the 2050 RTP/SCS.

Section 8 of the FAST plan asserts that a major benefit of the plan is increased transit ridership compared to existing conditions and presumably to the 2050 RTP/SCS; neither the FAST plan nor the Move SD comment letter provides a comparison of transit ridership increases of the FAST plan compared to the 2050 RTP/SCS. Without a clear understanding of the missing highway network and land use pattern that would accompany the FAST plan, any potential increase in transit ridership or reduction in operational impacts such as air pollutant and GHG emissions is speculative.

**Draft EIR comment Letter L (Preserve Calavera) regarding transportation demand management (TDM)**

**Preserve Calavera Suggested Alternative #1 (Comment L69)**

In its August 1, 2011 comment letter on the Draft EIR, Preserve Calavera stated: “There is no real extensive/mandated TDM alternative. It is possible that this would greatly reduce peak hour trips and VMT – with a result that many of the projected road expansions/extensions may no longer be required.

**Findings and Rationale**

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative(s) identified above. An Unconstrained Funding Alternative that would fully implement the TDM programs and improvements was considered, but ultimately rejected as an alternative for multiple reasons. First, the Unconstrained Network was rejected because it is not based on reasonable revenue availability and is therefore not economically or legally feasible. Consistent with 23 CFR section 450.322 (b) (11), SANDAG is required to prepare an RTP that is revenue constrained. The unconstrained transportation needs for the San Diego region would total over $150 billion. This represents a deficit of nearly $38 billion over what is reasonably expected to be available over the time horizon of the plan. Second, this alternative was rejected from detailed consideration because it would not avoid or substantially reduce any of the 2050 RTP/SCS' significant environmental impacts, and because major elements of this alternative are included in the 2050 RTP/SCS and evaluated in detail in 2050 RTP/SCS EIR. (See Draft EIR, Section 6.5.1.)

**Draft EIR comment Letter P (Sierra Club letter #1) regarding GHG emissions**

**Sierra Club #1 Suggested Alternative #1 (Comment P30)**

In its August 1, 2011 comment letter on the Draft EIR, the Sierra Club stated: “The DEIR should provide and evaluate at least one alternative designed to maximize the reduction of GHG emissions.”
Finding and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative(s) suggested above. The State CEQA Guidelines require the selection of reasonable alternatives for evaluation in the EIR (as provided in CEQA Guidelines Section 15126.6(c)) that avoid or substantially lessen one or more of the significant impacts of the project. Alternative 5 Slow Growth analyzed in the EIR substantially lessens GHG emissions.

Alternative 5 reduces impact GHG-1 (increase GHG emissions compared to existing conditions in 2010) to a less than significant level in 2020 and reduces the significant impact of the 2050 RTP/SCS in 2035 and 2050, although the impact for both time periods would remain significant under this alternative. Alternative 5 results in a less than significant impact for GHG-2 (conflict with SB 375 GHG emission reduction targets) in 2020 and 2035. Since SB 375 implementation does not set an emissions reduction target for 2050, no specific conclusion is reached in the Draft EIR regarding GHG-2 in that year for the 2050 RTP/SCS or any of the project alternatives. Alternative 5 also results in a less than significant impact for GHG-3 (conflict with applicable GHG reduction plans) in 2020, 2035 and 2050. Additionally, Alternatives 1, 2a, and 2b also reduce significant impact GHG-1 of the 2050 RTP/SCS in 2050, although the impact would remain significant under those alternatives. (See MR-16 for a discussion of alternatives that reduce GHG emissions and MR 17 regarding the infeasibility of extreme transit phasing alternatives.)

However, Alternative 5 is infeasible for the reasons set forth in Section VIII of these Findings (Finding Regarding Alternatives Evaluated in EIR), including the fact that the slow-growth policies upon which it is based would render the SCS out of compliance with SB 375 and is therefore, legally infeasible. Additionally, if the 2050 RTP/SCS provided a land use pattern than was substantially different from local general plans and planning assumptions, the RTP would be inconsistent with air quality conformity law, and the Draft EIR’s analysis of future conditions and impacts would not be realistic. Further, SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS or a more intensified land use pattern. Alternative 5 would also not provide an environmentally sustainable transportation system and Sustainable Communities Strategy fostering efficient concentrated land development patterns that accommodate the region’s future employment and housing needs because both jobs and housing growth would be restricted by slow-growth policies. Alternatives 1, 2a, and 2b are also infeasible for the reasons set forth in Section VIII of these Findings (Finding Regarding Alternatives Evaluated in EIR).

Sierra Club #1 Suggested Alternative #2 (Comment P31)

In its August 1, 2011 comment letter on the Draft EIR, the Sierra Club stated: “In the effort to draft a reasonable range of alternatives pursuant to CEQA, the Sierra Club, supports a critical assessment of the 5010 Plan proposed by the Cleveland National Forest Foundation.”

Finding and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make the 50-10 Plan infeasible. This alternative is rejected based on the reasons provided in Master Responses 16 and 17, and for the reasons set forth in the finding below regarding SOFAR Suggested Alternative #1 (Comment R39). The finding below regarding SOFAR Suggested Alternative #1 (Comment R39) is incorporated by reference here.
Draft EIR comment Letter Q (Sierra Club letter #2)

Sierra Club #2 Suggested Alternative #1 (Comment Q12)

In its August 1, 2011 comment letter on the Draft EIR, the Sierra Club stated: “The ‘50-10 Plan’ presented by the Cleveland National Forest Foundation, calls for reallocating the TransNet Tax from freeway expansion to transit.”

Finding and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative(s) identified above. The 50-10 plan is rejected as infeasible for the reasons set forth in Master Responses 16 and 17, and for the reasons set forth in the finding below regarding SOFAR Suggested Alternative #1 (Comment R39). The finding below regarding SOFAR Suggested Alternative #1 (Comment R39) is incorporated by reference here.

Sierra Club #2 Suggested Alternative #2 (Comment Q21)

In its August 1, 2011 comment letter on the Draft EIR, the Sierra Club discussed the following suggested alternative:

“The features of this Equitable Alternative would be:

- Reallocating TransNet money for building new lanes on our freeways to instead by used for transit
- Unbundling the cost of parking and operating roads
- Using funds for ‘Smart Growth’ and bicycle transportation in ways that maximize the driving reduction achieved for each dollar spent.”

Finding and Rationale

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative(s) identified above. The “Equitable Alternative” presented in this comment includes components that were previously examined in the Draft EIR, as well as features that were not because they are considered infeasible to implement. For ease of discussion, the components of the “Equitable Alternative” are reiterated in bold print at the beginning of each of the paragraphs below and a discussion of each follows. Master Response 16 provides a detailed discussion on the reasonable range of alternatives that were analyzed in the Draft EIR.

Reallocating TransNet money: As described in Section 6.2 of the Draft EIR, Alternatives 2a and 2b are based on a modified funding strategy that would result in the implementation of less highway projects and more transit projects (see Draft EIR Tables 6.2-3 and 6.2-4 for a list of projects included in the modified funding strategy), and Alternatives 3a and 3b would also emphasize transit and modify the phasing of transportation improvements, which would require reallocation of TransNet funding (see Draft EIR Tables 6.2-6 and 6.2-7 for a list of projects included in the transit emphasis strategy). Master Response 16 offers an explanation the range of alternatives included in the Draft EIR; as explained in that response, CEQA does not require an EIR to evaluate multiple permutations of the alternatives. Additionally, major reallocations of
TransNet funds are legally and financially infeasible, for the reasons explained in Master Response 10.

Unbundling the cost of parking and operating roads (road use fee pricing system): Master Response 15 provides a discussion of why parking pricing policies would not be effective in reducing the Project’s transportation impacts to less than significant levels.

Using funds for “Smart Growth” and bicycle transportation in ways that maximize the driving reduction achieved for each dollar spent: This strategy is already included in the 2050 RTP/SCS. SANDAG has worked closely with the cities and the County to develop a regional Smart Growth Concept Map (approved in 2006, and updated in 2008). This map identifies existing, planned and potential smart growth opportunity areas in the region. Smart growth policies, programs, and guidelines that SANDAG has adopted over the past few years that support the 2050 RTP/SCS include, but are not limited to (1) the Smart Growth Concept Map, and (2) TransNet Smart Growth Incentive Program, which provides funds to local jurisdictions engaged in smart growth planning and smart growth capital investments. Please refer to Response Q-16 regarding how the 2050 RTP/SCS addresses bicycle use. The Regional Bicycle plan includes criteria to prioritize investments in regional bicycle facilities that will result maximize bicycle ridership. The Regional Bicycle plan also includes a framework for prioritizing investment in local bicycle facilities through the Active Transportation grant program. Further, the TransNet Extension Ordinance includes a provision for ‘routine accommodation’ – which requires projects using TransNet funding to accommodate all transportation modes, including bicycles.

**Draft EIR comment Letter R (SOFAR) regarding transit**

SOFAR Suggested Alternative #1 (Comment R39)

In its August 1, 2011 comment letter on the Draft EIR, SOFAR stated: “As discussed above, CNFF and SOFAR encourage SANDAG to consider and adopt a transit alternative that truly prioritizes transit. Attached, as Exhibit D, is a report prepared by Smart Mobility Inc., describing such an alternative: the 50-10 Transit Plan.”

**Finding and Rationale**

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make the 50-10 Plan infeasible, as explained below (and in Master Response 17.)

**Plan Overview.** Under the 50-10 plan, 50 years of transit improvements would be implemented over the next decade. The plan calls for halting “any” highway construction until the transit system is fully functional. An equally critical element of the plan calls for modification of the TransNet program to re-prioritize transit over highway projects. (See Executive Summary, page 1.)The 50-10 plan was not included in the EIR reasonable range of alternatives for several independent reasons.

**Inability to Meet Fundamental Project Objectives.** The 50-10 plan was not included in the EIR reasonable range of alternatives because it was unable to meet most of the fundamental project objectives. It is an alternative to one component of the 2050 RTP/SCS, e.g., transit, rather than a comprehensive alternative addressing highway network improvements and land use patterns and as well as transit. The plan does not specify whether it includes “any” highway expansion projects; if it is intended to include highway expansion projects, it does not specify which highway projects would be built, and when they would be built, other than after a high quality transit network is
established. Similarly, the 50-10 plan discusses the benefits of smart growth, but does not present an alternative land use pattern to the SCS.

The above analysis concerning inability to meet fundamental project objectives for the FAST plan applies equally to the 50-10 plan, since both are transit-only plans. Fundamental objectives are listed below, together with explanations of why the 50-10 plan does not meet them.

1) Provide an environmentally sustainable transportation system and SCS that foster efficient concentrated land development patterns. The 50-10 plan does not address the complete transportation system (highways as well as transit), and does not provide an alternative land use pattern to the SCS.

2) Provide a safe regional transportation system. The 50-10 plan does not address highway safety, bicycle safety, or pedestrian safety as separate elements.

3) Provide transportation system that offers convenient travel options and reasonable travel costs. Again, the 50-10 plan does not address highways as travel options.

4) Provide transportation system that support’s improvement of region’s standard of living. The 50-10 plan does not provide a complete transportation system, just transit systems.

5) Provide reliable transportation system that offers relatively consistent travel times by mode from day to day. The 50-10 plan addresses just one transportation mode, transit.

6) Provide equitable levels of service. The 50-10 plan does not address equitable levels of service for transit or for highways.

The 50-10 Plan is Within the Scope of the Transit Components of the 2050 RTP/SCS and Alternatives. CEQA does not require the consideration of multiple variations of the same alternative. (See Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 477.) The 50-10 plan transit projects would be “generally consistent with” the 2050 RTP/SCS transit projects (see Section 3, page 8 of the 50-10 Plan). The main difference between the two approaches is that the 50-10 plan would fund “the most important transit projects” within 10 years, and postpone any future roadway expansion until a high-quality transit network is established. Thus the only meaningful difference between the 2050 RTP/SCS and the 50-10 plan is the timing of transit projects.

Also, based on scoping comments, SANDAG recognized that there was interest in moving transit projects up in priority. In response, SANDAG developed Alternatives 2a, 2b, 3a, and 3b. Alternatives 2a and 2b modify TransNet allocations by increasing the number of transit projects and implementing some of them earlier, and eliminating or delaying some highway improvement projects. Alternatives 3a and 3b would also implement transit projects earlier, but not increase the number of transit projects beyond those in the 2050 RTP/SCS. These alternatives, especially 2a and 2b, were designed to reflect the 50-10 plan’s transit emphasis, but also were designed to be feasible within TransNet funding constraints, while the 50-10 plan is not (see below discussion).

No Evidence that the 50-10 Plan Reduces the 2050 RTP/SCS Significant Environmental Impacts. The EIR must analyze alternatives that avoid or substantially reduce the proposed project’s impacts. (CEQA Guidelines §15126.6.) A lead agency is not required to consider potential alternatives that would not reduce the significant environmental impacts of the project as proposed. (See Tracy First v. City of Tracy (2009) 177 Cal.App.4th 912, 928-930.) The 50-10 plan states that the plan will have several environmental benefits, including: shorter commutes, reduction of VMT, and congestion relief; reduced GHG emissions and air pollution; less fossil fuel
consumption; and greater conservation of farmlands and habitat (see Section 6, pages 15-19 of the 50-10 Plan). Since the 50-10 plan includes construction of essentially the same transit projects as the 2050 RTP/SCS, transit project construction-related impacts would be essentially the same as the 2050 RTP/SCS; they would just occur earlier.

The asserted environmental benefits of the 50-10 plan relate to operational impacts. However, the basis for these conclusions about environmental benefits is an assumption that regional VMT would be 12.4% less in 2050 based on data in a statewide report “Vision California.” This assumption does not constitute substantial evidence because no true regional analysis has been done to demonstrate that statewide data are relevant and applicable to the San Diego region. Further, the reduction in operational impacts is speculative without an understanding of the missing highway network and land use pattern that would accompany the 50-10 plan. Finally, there is no evidence in the 50-10 plan that the claimed environmental benefits of the 50-10 plan, even if they occurred, would avoid or substantially reduce any of the 2050 RTP/SCS significant environmental impacts.

Assertions are also made that the 2050 RTP/SCS does not represent the Smart Growth land use option, but instead is reflective of the Vision California report’s Mixed Growth land use option. However, the 2050 RTP/SCS actually exceeds the characteristics of the Smart Growth option which calls for new growth over the next 40 years to consist of approximately 37% single-family residential units (large lot and small lot), 14% townhome residential units, and 36% multifamily residential units. Implementation of the 2050 RTP/SCS will result in new growth consisting of approximately 18% single-family and townhome units combined, and 84% multifamily units (with a loss of approximately 2% of existing mobile home units). The Smart Growth option also indicates that in 2050, the total of existing units plus new growth would be approximately 53% large lot and small lot single-family units, 14% townhome units, and 33% multifamily units. By 2050, the RTP/SCS would result in a total for existing units plus new growth of 50% single-family and townhome units combined and 48% multifamily units, with 2% mobile home units. Therefore, the 2050 RTP/SCS represents the Smart Growth land use option described in the Vision California report.

The 50-10 Plan is Financially Infeasible. The Draft EIR (Section 6.5.1, p. 6-201) points out that an extreme phasing alternative is legally infeasible as well as economically infeasible. Federal law (23 CFR 450.322(b)(11)) requires RTPs to be revenue constrained. RTPs legally may include only those projects based on reasonable revenue projections.

The 50-10 plan is financially infeasible because restrictions on how funds can be used prevent major shifts in funding from highway projects to transit. This limited flexibility is further constrained by the annual allocation of most funds, which cannot be advanced. The state and federal governments provide the region funding for transportation projects that are allocated by gas tax receipts and population formula. These funds are distributed annually across the state and/or country and cannot be advanced. The 2050 RTP/SCS maximizes the investment in transit services based on projected funding that is eligible for transit projects for each of the phasing periods. More than half (56%) of the TransNet Early Action Program through 2015 (along with other local, state, and federal revenues it leverages) funds transit projects included in the 2050 RTP/SCS. Several Early Action transit projects are already underway and will be implemented prior to 2020: Mid-City Rapid (2012), I-15 BRT (2013), South Bay BRT (2014), and Mid-Coast LRT (2016-17). Other investments in transit are included in each 10-year phasing period from 2020-2050. For projects to move up in priority, other transit projects would have to be shifted to a later phasing period. This limited flexibility is further constrained by the annual allocation of most funds, which cannot be advanced. Regarding project priority, deferring a highway project in favor of a
transit project is not always feasible given restrictions on how funds can be used. In situations where funds are flexible, funding could be spent on highway or transit projects. The proposed implementation priorities in the 2050 RTP/SCS reflect the goal to have a mixture of rail and bus transit improvements in each phasing period. Most of the highway expenditures included in the 2050 RTP/SCS are for managed lanes that will accommodate transit and carpools. Many of the highway facilities to be constructed in the next 10 years will serve transit routes. Additionally, SANDAG is limited by revenues restrictions for most funding sources.

Passed by voters in 2004, the TransNet Extension Ordinance and Expenditure Plan (Ordinance CO-04-01) includes provisions that enable either the voters in the San Diego region, or the SANDAG Board of Directors, acting as the San Diego County Regional Transportation Commission (SDCRTC), to modify the expenditure plan that outlines how TransNet funding will be allocated over the 40-year life of the measure. Completion of State Routes 52 and 76 and the construction of the Mid-Coast Light Rail Transit project can only be modified by two-thirds approval of the general electorate. Similarly, the TransNet Environmental Mitigation Program (EMP) and certain other Ordinance provisions can only be modified by the voters. Other projects outlined in the expenditure plan and other Ordinance provisions can be modified by a two-thirds vote of the SANDAG Board in its capacity as the SDCRTC. Since 2004, the SANDAG Board has acted on the following limited amendments to the TransNet Extension Ordinance and Expenditure Plan:

- December 2006: Amendment to Ordinance CO-04-01 Revising the Expenditure Plan to Include Completion of the SPRINTERR – enabled fully funding the completion of the SPRINTERR rail project between Oceanside and Escondido (Ordinance CO-06-1)
- May 2008: Amendment to Ordinance No. CO-04-01 to Revise EMP Principle No. 10 – extended to the year 2010 the deadline for the Board to act on additional regional funding measures to meet the long-term requirements for implementing habitat conservation plans in the San Diego region (Ordinance CO-08-01)
- July 2009: Amendment to Ordinance CO-04-01 regarding Audit Reporting for the Regional Transportation Congestion Improvement Program (RTCIP) – aligned the timeline for the RTCIP audits with the TransNet annual fiscal and compliance audit requirements (Ordinance CO-09-01)
- November 2009: Amendment to Ordinance No. CO-04-01 to Revise EMP Principle No. 10 – extended to the year 2012 the deadline for the Board to act on additional regional funding measures to meet the long-term requirements for implementing habitat conservation plans in the San Diego region (Ordinance CO-10-02)

The TransNet Extension Ordinance also includes a provision for “Ten-Year Comprehensive Program Review,” which requires SANDAG to re-evaluate the expenditure plan in ten-year increments to ensure performance with the intent of TransNet and to make revisions to the expenditure plan, if necessary. The first review will occur in 2018. The SANDAG Board of Directors has indicated that modifying TransNet at this point prior to the first comprehensive ten-year review, would be premature; at this time, the Board has indicated its desire to maintain the specific major corridor projects that the voters approved in 2004.

The 2050 RTP/SCS financing strategy assumes 50% match from non-TransNet sources for major capital transit projects. SANDAG competes with other regions in the country for New Starts dollars to match TransNet funding. New Starts is a federal program through the Federal Transit Administration to build new large transit capital projects. SANDAG made reasonable assumptions
about how many New Starts grants could be awarded in the San Diego region based on past experience and the highly competitive process/long timeframe needed for securing these funds. SANDAG cannot make overly aggressive assumptions about how many New Starts grants could be awarded due to the limited funding available at the federal level and the inability to identify adequate funding to support ongoing operations of any such facilities.

The 2050 RTP/SCS must be revenue constrained in that SANDAG cannot front load the Plan with projects prior to receiving revenue. In the first 20 years, the San Diego region expects, based on reasonable assumptions, to receive only one-third of the total projected revenues, with two-thirds of the revenues available in the last 20 years of the Plan. If significantly more transit were to be built in the earlier years of the plan, there are no funds identified or available to support the operations of those facilities, which has been an on-going issue with transit operations. The 2050 RTP/SCS acknowledges the need for additional local funding and anticipates new local funding sources to provide a more stable and ongoing source of revenues for transit operations in the future that is currently not available.

_Draft EIR comment Letter T (Torrey Pines Community Planning Board letter #2) regarding sound mitigation and highway expansion, innovative roadway design, and lane configurations_

_Torrey Pines Community Planning Board #2 Suggested Alternative #1 (Comment T25)_

In its August 1, 2011 comment letter on the Draft EIR, the Torrey Pines Community Planning Board stated: “Why has SANDAG failed to consider the alternative of cars-only parkways that were developed around New York, Connecticut, and the Washington DC area?"

_Finding and Rationale_

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative(s) suggested above. An EIR is not required to consider alternatives to individual project components such as the Goods Movement Strategy, just the project as a whole. See Master Response 16 for further explanation.

_Torrey Pines Community Planning Board #2 Suggested Alternative #3 (Comment T32)_

In its August 1, 2011 comment letter on the Draft EIR, the Torrey Pines Community Planning Board stated: “Why has the SANDAG’s 2050/SCS RTP DEIR failed to provide a “building truck-only lanes and bypasses” alternative? Why has SANDAG not mentioned a study that recommends improvement of hauling freight by rail rather than by truck?”

_Finding and Rationale_

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative(s) identified above. An EIR is not required to consider alternatives to individual project components such as the Goods Movement Strategy, just to the project as a whole. See Master Response 16 for further explanation.
X. FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT EIR AND REVISIONS TO THE FINAL EIR

Finding: Appendix G of the EIR includes the comments received on the Draft EIR and responses to those comments. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by CEQA Guidelines § 15088(b). The EIR also incorporates information obtained and produced after the Draft EIR was completed, including additions, clarifications, and modifications. The Board has reviewed and considered the Final EIR and all of this information. The Board finds that responses to comments made on the Draft EIR and revisions to the Final EIR merely clarify, amplify or make insignificant modifications to the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines §15088.5(b). Similarly, revisions to the project description since publication of the Draft EIR do not result in any new significant impacts or any substantial increases in the severity of an environmental impact, and do not trigger the need to recirculate per CEQA Guidelines §15088.5(b). This finding is based upon all the information presented in the FEIR and the record of proceedings.

Rationale: The new information added to the EIR does not involve a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible mitigation measure or alternative considerably different from others previously analyzed that the Project sponsor declines to adopt and that would clearly lessen the significant environmental impacts of the Project. With respect to revisions to the project description since publications of the Draft EIR, the project description included in the Draft EIR included all the requirements of Section 15124 of the CEQA Guidelines, including a general description of the project’s technical, economic, and environmental characteristics. Information included in the project description was sufficient to conduct the EIR’s environmental impact analysis using accepted methodologies appropriate for the Program EIR’s level of detail. The project description presented in the Draft EIR has been modified to include revisions to various highway, transit, and arterial improvements, set forth in detail in Master Response 13 (Project Description) in the Final EIR. As a result of these project description revisions, the impact analysis for several environmental resources changed from the Draft EIR to the Final EIR. In no case did the project description changes result in a new significant impact, or a substantial increase in the severity of a significant impact identified in the Draft EIR.

The summary below provides a list of the environmental resource areas where impacts increased from the Draft EIR to the Final EIR, and explains why these changes do not result in a new significant impact, or a substantial increase in the severity of a significant impact identified in the Draft EIR:

- Section 4.3 Air Quality
  - Impact AQ-1 related to air quality attainment plans, previously determined to be significant and unavoidable, includes an analysis for air quality conformity for 8-Hour Ozone (ROG and NOx). In 2050, NOx increased from 30.69 tons/day to 30.70 tons/day, which is an increase of 0.01 tons/day. This increase is not considered a substantial increase in severity because it represents an increase of .03 percent emissions per day.
  - Impact AQ-2 related to air quality standards, previously determined to be significant and unavoidable, includes an analysis of forecasted on-road emissions for CO, ROG, NOx, PM10 and PM2.5. In 2050, NOx increased from 30.07 tons/year to...
30.08 tons/year, which is an increase of 0.01 tons/day. This increase is not considered a substantial increase in severity because it represents an increase of 0.03 percent emissions per year.

- **Section 4.4 Biological Resources**
  - Impact BIO-4 related to habitat conservation and natural communities conservation planning, previously determined to be significant was revised to include newly obtained data that was received related to the hardline MHCP reserve boundaries. On account of this newly obtained information, more detail was provided on impacts to lands in the existing hardline MHCP preserve, and are reflected in Final EIR Tables 4.4-19, 4.4-20, and 4.4-21. Though the updated information made it possible to quantify impacts to hardline preserves from transportation improvements, the original analysis noted the potential for such impacts. A significant impact was previously concluded for land use changes and the construction of transportation network improvements in each of the horizon years. This conclusion remains unchanged as a result of the newly obtained MHCP data. Thus, while Tables 4.4-19, 4.4-20, and 4.4-21 changed in the Final EIR, these changes merely amplify information in the Draft EIR, and do not represent a new impact or affect the severity of the previously determined significant impact for BIO-4.

- **Section 4.17 Transportation**
  - Impact T-4 related to congested travel, already significant and unavoidable, increased in 2050. However, the increase was minimal, adding approximately 314,000 congested vehicle miles of travel (VMT at LOS E or worse in the peak period) compared to a total of approximately 110 million VMT daily region-wide. This increase is not considered a substantial increase in severity because it represents an addition of 0.3 percent of the total daily VMT in the region.

Additionally, a number of mitigation measures were modified or added in response to comments received on the Draft EIR. A list of new or modified mitigation measures is included in Master Response 3 (Recirculation). None of these modifications or additions change the conclusions within the Final EIR related to the ability of mitigation measures to reduce the project’s significant impacts to less than significant levels. Complete revisions to each of the mitigation measures listed are provided in the Final EIR in Table ES-1 of the Executive Summary, and shown in strikethrough underline text. These changes are also reflected throughout the Final EIR in the respective environmental resource sections.

**XI. FINDING ADOPTING A MITIGATION MONITORING PROGRAM**

The SANDAG Board of Directors finds that a Mitigation Monitoring and Reporting Program (MMRP) for the 2050 RTP/SCS has been prepared for the Project and has been adopted concurrently with these Findings (Public Resources Code, § 21081.6(a)(1)). The San Diego Association of Governments (SANDAG) will use the MMRP to track compliance with Project mitigation measures. The MMRP will remain available for public review during the compliance period.
XII. FINDING REGARDING LOCATION AND CUSTODIAN OF RECORD

The documents and other materials that constitute the record of proceedings on which SANDAG’s Findings of Fact are based are located at 401 B Street, Suite 800, San Diego, California 92101. The custodian of these documents is Rob Rundle, Principal Regional Planner. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and 14 Cal. Code Regs. § 15091(e).

For purposes of CEQA at these Findings, the Record of Proceedings for the Project consists of the following documents, at a minimum:

- The Notice of Preparation and all other public notices issued by SANDAG and in conjunction with the Project.
- The Draft and Final EIRs, including appendices and technical studies included or referenced in the Draft and Final EIRs.
- All comments submitted by agencies or members of the public during the 55-day public comment period on the Draft EIR.
- All comments and correspondence submitted to SANDAG with respect to the Project.
- The MMRP for the Project.
- All Findings and resolutions adopted by SANDAG decision makers in connection with the Project, and all documents cited or referred to therein.
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by AECOM, consultants to SANDAG.
- All documents and information submitted to SANDAG by responsible, trustee, or other public agencies, or by individuals or organizations, in connection with the Project, up through the date the SANDAG Board of Directors approved the Project.
- Minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by SANDAG, in connection with the Project.
- Any documentary or other evidence submitted to SANDAG at such information sessions, public meetings, and public hearings.
- Matters of common knowledge to SANDAG, including, but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, in addition to those cited above.
- Any other materials required to be in the Record of Proceedings by Public Resources Code § 21167.6(e).
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   A. Project Description Summary
   B. Project Objectives
   C. Type of EIR
   D. Procedural Compliance with CEQA
   E. Incorporation of Final EIR by Reference

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III. FINDINGS REGARDING ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT
   A. Agriculture and Forest Resources (EIR Section 4.2)
   B. Air Quality (EIR Section 4.3)
   C. Cultural Resources and Paleontology (EIR Section 4.5)
   D. Environmental Justice (EIR Section 4.6)
   E. Geology, Soils and Mineral Resources (EIR Section 4.7)
   F. Greenhouse Gas Emissions (EIR Section 4.8)
   G. Hazards and Hazardous Materials (EIR Section 4.9)
   H. Hydrology and Water Quality (EIR Section 4.10)
   I. Land Use (EIR Section 4.11)
   J. Noise (EIR Section 4.12)
   K. Population and Housing (EIR Section 4.13)
   L. Public Services, Utilities and Energy (EIR Section 4.14)
   M. Recreation (EIR Section 4.15)
   N. Transportation and Traffic (EIR Section 4.16)
   O. Water Supply (EIR Section 4.17)

IV. FINDINGS REGARDING SIGNIFICANT ENVIRONMENTAL IMPACTS MITIGATED TO A LEVEL LESS THAN SIGNIFICANT
   A. Biological Resources
   B. Cultural Resources and Paleontology (EIR Section 4.5)
   C. Environmental Justice (EIR Section 4.6)
   D. Geology, Soils and Mineral Resources (EIR Section 4.7)
   E. Hydrology and Water Quality (EIR Section 4.10)
   F. Public Services, Utilities and Energy (EIR Section 4.14)
   G. Recreation (EIR Section 4.15)
   H. Water Supply (EIR Section 4.17)

V. FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS
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STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE 2050 REGIONAL TRANSPORTATION PLAN/ SUSTAINABLE COMMUNITIES STRATEGY

The San Diego Association of Governments (SANDAG) Board of Directors (Board) adopts and makes this statement of overriding considerations concerning the Project’s unavoidable significant impacts to explain why the Project’s benefits override and outweigh its unavoidable impacts.

The Final Environmental Impact Report (EIR) has identified and discussed significant effects that may occur as a result of the Project. As set forth in these California Environmental Quality Act (CEQA) Findings, SANDAG has made a reasonable and good faith effort to eliminate or substantially mitigate the impacts resulting from the Project and has made specific findings on each of the Project’s significant impacts and on mitigation measures and alternatives. With implementation of the mitigation measures discussed in the EIR, many of the Project’s effects can be mitigated to a level of less than significant. Even with implementation of all feasible mitigation, however, the Project will result in significant and unavoidable impacts, both direct and cumulative, to: Aesthetics and Visual Resources; Agriculture and Forest Resources; Air Quality; Biological Resources; Geology, Soils, and Mineral Resources; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Land Use; Noise; Population and Housing; Public Services, Utilities, and Energy; Recreation; Transportation and Traffic; and Water Supply.

In accordance with Section 15093 of the CEQA Guidelines, and having reduced the adverse significant environmental effects of the Project to the extent feasible, having considered the entire administrative record on the Project, and having weighed the benefits of the Project against its unavoidable adverse impacts after mitigation, the Board hereby finds that the following legal, economic, social, and environmental benefits of the Project outweigh its unavoidable adverse impacts and render them acceptable based upon the following considerations. Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every unavoidable impact:

Project Benefits:

At the core of the 2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are six broad policy goals and nearly 20 policy objectives that address the project’s long-term mobility needs to better connect transportation and land use policy decisions and to create a transportation network that would serve the region through the year 2050. The 2050 RTP/SCS achieves these goals in the following manner:

General RTP/SCS Benefits

- The 2050 RTP/SCS would achieve the Senate Bill 375 (Steinberg, 2008) (SB 375) regional greenhouse gas reduction targets, reducing 2020 per capita emissions by 14 percent and 2035 per capita emissions by 13 percent compared to the SB 375 2005 baseline. (2050 RTP/SCS, Chapter 3, Table 3.1)
• The 2050 RTP/SCS would accommodate forecast population, housing, and employment growth to 2050 also while improving access to employment, shopping, and services in all parts of the region. The Project would bring home, work, and services together and help eliminate the need for long commuter trips. This is consistent with the SANDAG regional growth management strategy effort, the Regional Comprehensive Plan, and with the 2050 Regional Growth Forecast, as well as the movement of local jurisdictions to a smart growth land use pattern. In 2050, the land use pattern in the SCS, 64 percent of the region’s housing units (up from 45 percent in 2008) and 76 percent of the region’s jobs (up from 52 percent in 2008), will be located within 1/2 mile of transit. Because of projected housing construction and job growth and new transit services, the number of housing units and jobs within 1/2 mile of transit nearly doubles between 2008 and 2050 – an increase of 464,253 housing units or 90 percent and increase of 736,933 jobs or 94 percent. (2050 RTP/SCS, Chapter 3, Figure 3.9)

• The SCS land use pattern addresses the needs of all economic segments of the population. About 84 percent of the projected 388,000 new homes to be built by 2050 will be attached, multifamily units – with a planned capacity of more than 225,000 units at 30 or greater dwelling units per acre, and almost 75,000 units with a housing density of 20 to 29 dwelling units per acre. This capacity for planned housing development, particularly for multifamily development, will help the region accommodate the projected housing needs for residents of all income levels. (2050 RTP/SCS, Chapter 3, Table 3.2)

• The 2050 RTP/SCS land use pattern protects and preserves about 1.3 million acres of land, more than half the San Diego region’s land area. These open space lands include habitat conservation areas, parks, steep slopes, floodplains, and wetlands. (2050 RTP/SCS, Chapter 3, Table 3.5)

Transit and Bicycle/Pedestrian Benefits

• Average travel speed would be improved for transit travel under the 2050 RTP/SCS. Transit work trips are 3 mph faster than current conditions with an average speed of 13 mph. This means that the average transit travel speeds increase by 30 percent. (2050 RTP/SCS, Chapter 2, Table 2.2)

• The 2050 RTP/SCS introduces a wide range of transit service types to better serve different travel needs: increased frequencies on local bus service to serve short-distanced trips, increased frequencies on existing Trolley lines and new Trolley and Rapid Bus lines to serve medium distanced trips, and new express trolley and Bus Rapid Transit lines to serve long distance regional trip making. (2050 RTP/SCS, Chapter 6)

• The 2050 RTP/SCS would result in a higher work trip mode split during peak periods among carpool, transit, and bike/walk trips. Under the 2050 RTP, 31.1 percent of peak period work trips would be nondrive-alone trips, whereas, currently, only 19.5 percent are nondrive-alone trips. The mode split for transit in the 2050 RTP is 11.1 percent. (2050 RTP/SCS, Chapter 2, Table 2.2)
• When comparing travel times by mode, there are substantial improvements in transit travel times (5-7-minute travel time savings per trip, on average, for both LIM and non-LIM) compared with existing conditions. (2050 RTP/SCS, Chapter 4, Table 4.5)
  o Substantial improvement in the share of commute trips accessible within 30 minutes for all Communities of Concern. (2050 RTP/SCS, Chapter 4, Table 4.6)
  o Access to higher education via public transit shows substantial improvement with the 2050 RTP, compared with the No Project alternative. The 2050 RTP substantially improves access for Communities of Concern. (2050 RTP/SCS Chapter 4, Tables 4.7 and 4.8).

• The 2050 RTP/SCS includes substantial funding to implement regional and local bicycle and pedestrian projects and programs ($2.7 billion) that are expected to result in a doubling of bike/walk trips for work during peak periods, compared to the 2050 No Project alternative or current conditions (2050 RTP/SCS, TA 3.1). In addition, the 2050 RTP/SCS includes nearly $1.1 billion for the Smart Growth Incentive Program, and another $1.1 billion for the Safe Routes to Transit program, which support active transportation (2050 RTP/SCS, Chapter 5, Table 5.2). All figures are expressed in year of expenditure dollars.

  **Congestion Relief and Safety Benefits**

• The 2050 RTP/SCS improves the reliability of the transportation system in 2050 by reducing congestion of the freeway network. The 2050 RTP would reduce the percentage of daily vehicle miles traveled at level of service (LOS) E (or worse) from 18 percent under No Project conditions to 11 percent. (2050 RTP/SCS, Chapter 2, Table 2.2)

• The 2050 RTP/SCS also would decrease freeway congestion during peak periods in 2050. The 2050 RTP/SCS peak period vehicle miles traveled at LOS E (or worse) would be 17 percent, which is 11 percent less compared to No Project conditions. This would improve accessibility to major employment and other regional activity centers. (2050 RTP/SCS, Chapter 2, Table 2.2)

• In over 90 percent of the travel corridors identified in Technical Appendix 3, travel times are reduced, in some cases by more than an hour (Otay Mesa to University Towne Centre) compared to the No Project alternative. (2050 RTP/SCS, Technical Appendix 3, Table TA 3.2)

• The 2050 RTP/SCS would improve highway safety by including plans and programs such as Safe Routes to Transit, Safe Routes to Schools, the San Diego Regional Bicycle Plan, Transportation Demand Management (TDM), and Public Safety, all of which are part of the 2050 RTP/SCS. (2050 RTP/SCS, Chapters 6, 7, and 8)

  **Economic Benefits**

• The project is expected to result in 18,500 more jobs per year, on average, over the life of the Plan, compared to the No Project Alternative. The benefits increase over time, resulting in 25,500 more jobs per year in the 2036-2050 timeframe comparing the No Project Alternative (18,200) with the Plan (43,700). (2050 RTP/SCS, Technical Appendix 3, Table TA 3.1)
Attachment 1C
Mitigation Monitoring and Reporting Program (MMRP)

Purpose and Intended Use of the MMRP

The California Environmental Quality Act (CEQA) requires that an agency adopt a Mitigation
Monitoring or Reporting Program (MMRP) prior to approving a project that includes mitigation
measures. This MMRP has been prepared in compliance with the requirements of Section
21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the
CEQA Guidelines.

The purpose of this MMRP is to ensure the adopted mitigation measures adopted in the findings
of fact for 2050 RTP/SCS EIR are implemented, in accordance with CEQA requirements. The
2050 RTP/SCS EIR findings adopt feasible mitigation measures to reduce the significant
environmental impacts of the 2050 RTP/SCS. This MMRP clarifies the process for SANDAG
and Implementation Agencies to ensure these mitigation measures are implemented, and
designates responsibility for implementing, monitoring, and reporting mitigation.

Several of the adopted EIR mitigation measures will be implemented by SANDAG in future
updates to the RTP/SCS. Most of the adopted mitigation measures are programmatic first-tier
mitigation that shall be implemented by SANDAG and can and should be implemented by other
Implementation Agencies during future project-specific design and second-tier environmental
review. When SANDAG is the direct source of funding for transportation network improvement
projects, SANDAG will require as a grant condition the implementation of those 2050 RTP/SCS
mitigation measures that are applicable to, and feasible for, the project type being funded. The
MMRP for this Program EIR may be used as a tool for incorporating mitigation measures into
future second-tier projects, as provided for in CEQA Guidelines Section 15168(c)(3).

In addition, SB 375 provides specific CEQA streamlining for residential/mixed-use projects and
transportation priority projects (TPPs) if they incorporate mitigation measures from an SB 375-
compliant RTP EIR. To take advantage of these CEQA streamlining opportunities,
Implementation Agencies may use this MMRP as a tool for incorporating mitigation measures in
their future residential/mixed use projects and TPPs.

Mitigation Measures Adopted with the 2050 RTP/SCS

The mitigation measures adopted in the 2050 RTP/SCS EIR findings are included in Table 1. The
Table identifies:

- The content of the mitigation measure
- The timing of implementation:
  - Planning and Project Design
  - Grading/Construction
  - Post Construction
  - Ongoing
- The responsible party:
  - SANDAG
  - Transportation Implementation Agency – Transportation or other governmental
    agencies, including cities and the County of San Diego, responsible for
    implementing local and/or regional transportation network improvements
- Land Use/Special District Implementation Agency – Land use agencies, including cities and the County of San Diego, and Special Districts, such as water service providers, responsible for discretionary actions involved in land use and associated infrastructure projects and planning

**Enforcement**

CEQA requires mitigation measures to be “fully enforceable” through the use of permit conditions, agreements, or other measures within each Lead Agency’s authority (Public Resources Code 21081.6(b)). Most of the adopted mitigation measures are programmatic first-tier mitigation that shall be implemented by SANDAG and can and should be implemented by other Implementation Agencies during future project-specific design and environmental review. The Lead Agency for each future project is responsible for assuring the project-specific mitigation measures it adopts are enforceable. In addition, as mentioned above, when SANDAG is the direct source of funding for transportation network improvement projects, SANDAG will require as a grant condition the implementation of those 2050 RTP/SCS mitigation measures that are applicable to, and feasible for, the project type being funded.

**Implementation and Reporting**

SANDAG shall designate a staff person to serve as coordinator for overall implementation and administration of this Mitigation and Monitoring Program and for its application to future projects in which SANDAG is the Lead Agency. This person (Coordinator) will also ensure that when SANDAG is the direct source of funding for transportation network improvement projects, SANDAG will require as a grant condition the implementation of those 2050 RTP/SCS mitigation measures that are applicable to, and feasible for, the project type being funded.

**Mitigation Monitoring Status Reporting**

For those mitigation measures that SANDAG is responsible for implementing or partially implementing, reports on the progress of implementation of these measures will be made on a bi-annual basis to the SANDAG Board of Directors. The report shall be prepared by the Coordinator and contain the following:

- A list of mitigation measures incorporated into second-tier environmental documents;
- An evaluation of the effectiveness of the mitigation measures;
- Recommendations for modifications to the Mitigation and Monitoring Program to improve effectiveness; and
- Required modifications to the Mitigation and Monitoring Program to comply with legislation and policies adopted in the previous year (e.g. newly listed threatened species).

Implementing Agencies for second-tier projects will be responsible for developing their own processes for mitigation monitoring status reporting.
### Table 1: Mitigation Monitoring and Reporting Program

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<th>Mitigation Measure</th>
<th>Timing of Implementation</th>
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<td>Planning and Project Design</td>
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<td><strong>Views, Landscape Features, Landforms</strong></td>
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<tr>
<td>VIS-A</td>
<td>During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure that projects are designed to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. The projects should avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Projects should be sited or designed to minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.</td>
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<tr>
<td>VIS-B</td>
<td>During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure that projects use natural landscaping to minimize contrasts between the project and surrounding areas. Wherever possible, the implementing agency should design transportation improvements, included highway expansions, extensions, and interchanges; transit lines; and arterial improvements at the grade of the surrounding land to limit view blockage to the extent feasible. Project designs should contour the edges of major cut-and-fill slopes to provide a more natural-looking finished profile.</td>
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<tr>
<td>VIS-C</td>
<td>During planning, design, and CEQA review of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should ensure landscaping design along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear travel experience that would otherwise occur.</td>
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<tr>
<td>VIS-D</td>
<td>During or immediately following construction of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should replace and renew landscaping to the greatest extent</td>
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2050 RTP/SCS Mitigation, Monitoring, and Reporting Program
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<td>possible along corridors with road widenings, interchange projects, and related improvements. The implementing agency should plan landscaping in new corridors to respect existing natural and man-made features and to complement the dominant landscaping of surrounding areas.</td>
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<td><strong>Views, Landscape Features, Landforms</strong></td>
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<td><strong>VIS-E</strong></td>
<td>During construction of development projects implementing the 2050 RTP/SCS growth forecast, and transportation projects included as part of the 2050 RTP/SCS, SANDAG shall and other the implementing agencies can and should ensure sound walls, berms or alternative noise reduction mechanisms, such as creating buffer zones, planting vegetation, or alternative pavement types, are constructed of materials whose color and texture complement the surrounding landscape and development. Design of the sound walls or alternative noise reduction mechanisms should use color, texture, landscaping, and alternating façades to “break up” large façades and provide visual interest.</td>
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<td><strong>Agriculture and Forest Resources</strong></td>
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<td><strong>FR-A</strong></td>
<td>During the design and CEQA review of development projects and transportation network improvements implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid impacting forest lands. Due to limited logging of forest lands in the San Diego region, the main reason to preserve forest land is to preserve quality native habitat. Where such impacts are unavoidable, the project design goal shall be replacement with equal or better quality habitat to ensure no net loss of the resource. Mitigation ratios for project-level impacts shall be determined through consultation with resource agencies and reference to applicable HCP/NCCP subarea plans.</td>
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<td><strong>FR-B</strong></td>
<td>When off-site mitigation is needed, SANDAG shall and other implementing agencies can and should provide it through acquisition and restoration (using EMP and other mitigation funds) of lands contiguous with areas of native habitat to maximize the biological value of the habitat provided as mitigation. Habitat acquisitions shall be coordinated with resource agencies and regional habitat conservation and planning efforts such as the MSCP and MHCP.</td>
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<td>Mitigation Measure</td>
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**Air Quality**

For land use plans and projects, cities in the San Diego region and San Diego County can and should assess increases in ozone precursors during project-specific design and CEQA review, and mitigate significant increases to the extent feasible. Measures described in Mitigation Measure GHG-B would also generally be applicable to ozone precursors, since most measures reducing GHG emissions also reduce ozone precursor emissions.

Specifically, at the plan level, land use plans should, when appropriate, incorporate planning and land use measures from the California Attorney General's latest list of example policies to address climate change (http://ag.ca.gov/globalwarming/pdf/GP_policies.pdf), including, but not limited to policies from that web page such as:

- Smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, incentives and fees, zoning, and public-private partnerships
- Create transit, bicycle, and pedestrian connections through planning, funding, development requirements, incentives and regional cooperation, and create disincentives for auto use
- Energy and water-efficient buildings and landscaping through ordinances, development fees, incentives, project timing, prioritization, and other implementing tools

In addition, they should also incorporate, when appropriate, policies to encourage implementation of the Attorney General’s list of project specific mitigation measures available at the following web site: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf, including, but not limited to measures from the web page such as:

- Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation
- Build or fund a major transit stop within or near development
- Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers
### Mitigation Measure

#### AQ-A2

- Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments.
- Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.

They should also incorporate, when appropriate, planning and land use measures from additional resources listed by the California Attorney General at the following webpage:

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During project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should incorporate project-appropriate dust control measures into project specifications, including but not limited to the following:

- Minimize land disturbance.
- Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas.
- Suspend grading and earth moving when wind gusts exceed 25 mph unless the soil is wet enough to prevent dust plumes.
- Cover trucks when hauling dirt.
- Stabilize the surface of dirt piles if not removed immediately.
- Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
- Minimize unnecessary vehicular and machinery activities.
- Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
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If project-level analysis demonstrates that NOx emissions would be significant, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should provide a plan, for approval by the implementing agency or jurisdiction, demonstrating that the heavy-duty (>50 horsepower) offroad vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will utilize all feasible measures to reduce the NOx emissions to a less than significant level. Acceptable options for reducing emissions may include use of late model engines, low emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

The project representative shall submit to the implementing agency or jurisdiction a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide the implementing agency or jurisdiction with the anticipated construction timeline, including start date, and name and phone number of the project manager and on-site foreman.

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<td>For transportation network improvements, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should evaluate the potential localized CO impacts of each project using procedures and guidelines contained in the CO Protocol (UCD ITS 1997) to determine the level of local CO “hot spot” analysis required (qualitative or quantitative) at the project level, if any, for the project. If required from the project analysis, mitigation measures would be added to the project design concept or scope to reduce local CO emissions.</td>
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|                    | For transportation network improvements, during project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should evaluate the potential localized particulate (PM10 and
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PM2.5) impacts and their health risks of project using procedures and guidelines for PM hotspot analysis consistent with USEPA (2010) PM guidance. If required from the project analysis, mitigation measures would be added to the project design concept or scope to reduce local particulate (PM10 and PM2.5) emissions. Per USEPA (2010) PM guidance, potential mitigation measures to be considered include but are not limited to: providing a retrofit program for older higher emitting vehicles, anti-idling requirements or policies, controlling fugitive dust, routing traffic away from populated zones, and replacing older buses with cleaner buses.

**Land Use Plans and Development Projects**

For land use plans and projects, cities in the San Diego region and San Diego County can and should assess health risks associated with CO and particulates during project-specific design and CEQA review, and mitigate them to the extent feasible. These assessments should focus on sensitive communities already experiencing high levels of air pollution and related diseases, and on other sensitive receptors.

For development projects, mitigation measures to reduce air pollution-related health risks include but are not limited to:

- Avoiding siting new sensitive land uses within 500 feet from the right of way of a freeway
- Implementing the construction mitigation measures listed in Mitigation Measures AQ-A2 and AQ-B
- Buffering residential, public assembly, and other sensitive land uses from industrial uses generating air pollutants that may pose public health risks
- Including landscaping, barriers, ventilation systems, and air filters or cleaners in project designs

Health Risk Assessments for Projects Involving Transportation Network Improvements or Land Use Plans and Development Projects

During project specific design and CEQA review, SANDAG shall and other implementing agencies can and should require, where warranted, the completion of health risk assessments using dispersion
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Modeling. A health risk assessment (HRA) is the quantitative evaluation of the risk of cancer (and sometimes non-cancer health effects) that may result from human exposure to pollutants such as toxic air pollutants. HRAs are complex and typically involve emissions quantification, air dispersion modeling, and risk modeling. Dispersion modeling is a modeling tool capable of predicting concentrations of pollutants in air in the vicinity of the pollutant sources. It is typically used to predict PM concentrations at receptor locations around a source of PM. AERMOD and CALPUFF are two of several dispersion modeling tools.

**Biological Resources**

**BIO-A**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid impacting sensitive vegetation communities. Where unavoidable, compensatory mitigation for impacts shall be required as specified through consultation with resource agencies and in approved Multiple Species Conservation Program (MSCP) or Multiple Habitat Conservation Program (MHCP) documents; and the County of San Diego’s Biological Mitigation Ordinance (BMO), Resource Protection Ordinance (RPO), County of San Diego Guidelines for Determining Significance for Biological Resources, Habitat Loss Permit (HLP) ordinance, City of San Diego’s Environmentally Sensitive Lands (ESL) regulations, City of Chula Vista’s Habitat Loss and Incidental Take (HLIT) regulations, and all other NCCP implementing ordinances for all vegetation communities. Compensatory mitigation is intended to result in the establishment of self-sustaining sensitive vegetation communities, replacing the lost habitat and/or habitat value, as required to offset those lost to the impacts and meet the requirements of all applicable agency and adopted plans, ordinances, and policies. Appropriate mitigation ratios and maintenance and monitoring requirements will be determined by these plans and/or ordinances, depending on the location of the impact and the affected sensitive vegetation community. Consistent with the above plans and ordinances, compensatory mitigation outside the Coastal Zone may be provided either through the purchase of credits at an existing authorized mitigation bank or in lieu fee program, or through project-specific mitigation. Compensatory mitigation for impacts inside the Coastal Zone may not be satisfied through in lieu fee programs and should occur within the Coastal Zone as close as is feasible to the impact. To the extent allowed by the above plans and ordinances, project specific mitigation may be provided through on-site restoration of temporary impacts, on-site or off-site preservation of existing habitats, or off-site restoration. On-site or off-site restoration areas used as mitigation should be maintained and monitored for a minimum of 5 years, but maintenance...
Mitigation Measure Timing of Responsible Implementation Party

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and monitoring shall continue until required success criteria are achieved. If the restoration is not meeting success criteria, remedial measures shall be implemented and would typically include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods. After final success criteria have been met and relevant permitting agencies have approved the mitigation project as complete, all mitigation areas be permanently conserved (e.g. conservation easement) and managed in perpetuity. As the CEQA lead agency, SANDAG shall and other lead agencies can and should review and approve all restoration plans prior to their implementation. Impacts to other sensitive vegetation communities that may occur as the result of implementing this measure include direct loss and indirect effects.

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid impacting jurisdictional wetlands and other waters (including jurisdictional vernal pools). Where unavoidable, such impacts shall be mitigated. Mitigation may be provided either through the purchase of credits at an existing authorized mitigation bank or in lieu fee program, or through project-specific mitigation. Compensatory mitigation for impacts inside the Coastal Zone may not be satisfied through in lieu fee programs and should occur within the Coastal Zone as close as is feasible to the impact. The mitigation ratio for jurisdictional wetlands shall be a minimum of 2:1 for the permanent loss of acreage to provide for no net loss of wetlands, however, project-level consultation with USACE and CDFG may result in a higher ratio. A minimum on-site mitigation/restoration ratio of 1:1 shall be provided for temporary impacts, unless USACE and CDFG determine otherwise higher ratio. A mitigation and monitoring plan completed per the requirements of USACE and CDFG shall be prepared for all impacts to jurisdictional waters. This plan shall include details regarding site appropriateness, preparation (e.g., grading), recontouring, planting specifications (including seed mixes and plant palettes), and irrigation design (if determined necessary), as well as maintenance and monitoring procedures (including monitoring period and reporting). Impacts to other sensitive vegetation communities that may occur as the result of implementing this measure include direct loss and indirect effects related to changes in hydrology and species composition. The plan shall also identify locally appropriate plant species for the mitigation/restoration plan, and outline yearly success criteria and remedial measures should the mitigation effort fall short of the success criteria. Success criteria shall be sufficient to create self-sustaining habitat providing the functions and values required to offset those lost to
the impacts and meet the requirements of all applicable agency and adopted plans, ordinances, and policies. Remedial measures typically include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods.

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**BIO-E**

When off-site mitigation is needed, during the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should provide off-site mitigation through acquisition and restoration (using EMP and other mitigation funds) of lands contiguous with areas of native habitat to maximize the biological value of the habitat provided as mitigation, through purchase of relevant habitat credits at an approved mitigation bank, or through payment into an approved in-lieu mitigation fee program applicable to the impacts (in lieu fee programs shall not be used to provide mitigation for impacts located within the Coastal Zone). When mitigation is provided outside of an adopted NCCP/HCP the following conditions shall apply to the maximum extent practicable: mitigation lands will be connected to existing conserved open space; consideration will be given to contributing in the establishment of large blocks of habitat or lands which are otherwise critical for covered species and/or providing for biological core areas and habitat linkages consistent with current regional conservation planning goals; and impacts to critical habitat will be mitigated within the same Critical Habitat Unit where the impacts occurred. Mitigation lands must be protected in perpetuity (e.g. through a conservation easement or similar legal protection) and adequately managed to maintain the originally intended biological quality and function in perpetuity. Habitat acquisitions, bank purchases, or fee program payments shall be coordinated with resource agencies and regional habitat conservation and planning efforts such as the MSCP and MHCP.

**BIO-F**

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should consult the resource agencies, regional databases, and local agencies to identify the current list of special status wildlife species occurrences and areas of occupied special status species habitat. Focused surveys for species shall be conducted as required by resource agency protocols (e.g., arroyo toad or least’s Bell vireo) or consultation within suitable habitat and during the appropriate field conditions for detection prior to any activity that may result in impacts. Surveys shall be conducted by a qualified biologist approved by the CEQA lead agency. Special status species without survey protocols will be recorded as observed during other focused and/or reconnaissance surveys during the appropriate field conditions for detection. If an individual project has the potential to result in “take” of a special status wildlife species, all appropriate take authorizations (e.g. Section 2081 Incidental Take Permit, Section 7) will be acquired prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations. Projects shall be designed to minimize
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or eliminate impacts to known special status wildlife species and implement species-specific avoidance, minimization, and/or mitigation measures.

BIO-G During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should consult the resource agencies to identify known special status plant species occurrences. If an individual project has the potential to result in “take” of a special status plant species, all appropriate take authorizations (e.g. Section 2081 Incidental Take Permit, Section 7) will be acquired prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations. Project designs shall reduce direct impacts to special status plant species by avoidance whenever feasible. A species and habitat compensation plan shall be prepared for unavoidable direct impacts on special status plant species, and shall be reviewed and approved by the resource agencies and CEQA lead agency prior to project approval. The plan shall identify effective methods for reestablishing the affected species and habitat, including but not limited to seed collection, salvage of root masses, and planting seeds and/or root masses in an area with suitable conditions. The plan shall also specify a monitoring program designed to evaluate success in reestablishing the affected species and habitat, and remedial measures that shall be followed if the project is not meeting specified performance criteria. The monitoring program shall be designed to evaluate the current and probable future health of the resources, and their ability to sustain populations in keeping with natural populations following the completion of the program. Remedial measures are highly dependent upon the species and habitats in question, but generally shall include but not be limited to exotic species management, predator control, access control, replanting and reseeding of appropriate habitat elements, regarding, and propagation and seed bulking programs.
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During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should avoid any clearing of vegetation within the breeding season of special status wildlife species (e.g., raptors and migratory birds, generally February 1 through September 1; arroyo toad, March 15 through July 1; Laguna Mountains skipper and Quino checkerspot butterfly, generally late February to early March) to avoid impacts to species. If activities must occur during special status species breeding season timeframes, a preconstruction survey by a qualified biologist shall be conducted to determine whether the species of concern are present within the proposed work area. If the species of concern are found on-site, the project shall implement measures to avoid impacts. Such measures shall be identified by project-specific CEQA documents, project permits, or the project biologist as necessary and may include delaying construction activities in all or part of the project until environmental conditions allow. For bird species, this is typically when nesting/fledging is complete. If construction activities must occur during the arroyo toad breeding season, a qualified biologist shall conduct preconstruction surveys and with wildlife agency approval translocate the arroyo toads and their eggs, tadpoles, or neonates to an area with appropriate habitat outside the construction limits. Translocation shall target the closest possible suitable habitat unless translocation to that location would transmit disease, exceed carrying capacities for the species, or cause other deleterious effects to the existing population at the translocation receiver site. If these translocation impacts to the receiver site are expected, other suitable sites without an existing arroyo toad population shall be considered for use as the receiver site, or compensatory mitigation shall be considered.

| BIO-I               |                          |                    |

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should modify designs to avoid impacts to vernal pools occupied by San Diego or Riverside fairy shrimp whenever feasible. Unavoidable impacts to habitat occupied by San Diego or Riverside fairy shrimp shall be mitigated through enhancement of degraded pools (e.g., exotics control, contouring, replanting of native species) and/or creation of more occupied pools (e.g., via grading of new pools and/or translocation of shrimp to existing unoccupied pools). Creation of new pools or enhancement of existing pools shall avoid or minimize to the greatest practicable extent any new impacts to vernal pools or their watersheds and to other sensitive vegetation communities.
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During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should incorporate measures to avoid and minimize temporary and/or permanent indirect impacts to aquatic species from construction- and/or operation-generated dust, erosion, runoff, and sedimentation within or into habitats supporting aquatic species. Such measures shall include implementation of Mitigation Measure BIO-C and location-specific measures as identified during project-specific review.

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should incorporate measures to avoid and minimize temporary and/or permanent indirect impacts to terrestrial wildlife species. Anticipated impact zones, including staging areas, equipment access, and disposal or temporary placement of spoils, shall be delineated with stakes and flagging prior to construction to avoid natural resources where possible. Such measures shall include noise attenuation measures if construction levels exceed preconstruction ambient noise levels within adjacent habitat as specified during project-specific review. Implement Mitigation Measures NO-1 through NOI-4 when permanent or temporary noise is identified as an impact to wildlife. Nighttime project lighting shall be directed at the project site or the construction site and away from sensitive habitats. Light glare shields shall be used to reduce the extent of illumination onto adjoining areas. Permanent lighting shall be shielded and directed at intended use areas. Fencing and/or walls shall be built to avoid temporary or permanent access of humans or domestic animals from development areas into areas occupied by special status species. Spoils, trash, or any debris shall be removed offsite to an approved disposal facility. Trash and food items shall be contained in closed containers and removed daily to reduce the attractiveness to opportunistic predators such as coyotes and feral dogs and cats that may prey on sensitive species. Workers shall be prohibited from bringing pets and firearms to the site.

See Mitigation Measures BIO-A through BIO-E.
## Mitigation Measure Timing of Responsible Implementation Party

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<td>During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should conduct wildlife movement studies for projects that may fragment or constrict regional or local corridors and impede use to nursery sites. These studies will include, but would not be limited to, the following objectives: identify activity levels and directional wildlife movement trends within the study area, assess current functionality of existing underpasses, and determine what species or groups of species exhibit sensitivity to the existing roadways. Movement studies shall identify project-specific measures to avoid or mitigate impacts to corridors and movement to nursery sites that may include, but are not limited to, developing alternative project designs that allow wider movement corridors to remain; provide for buffer zones adjacent to corridors, such as passive recreation zones); implement physical barriers that prevent human and/or domestic predator entry into the corridor or block noise and lighting from development; incorporate shielded and directed lighting in areas near corridors; implement a “natives only” landscaping policy within 200 feet of identified wildlife corridors; incorporate periodic larger habitat patches along a corridor's length; minimize the number of road crossings of identified wildlife corridors; and replace roadway culverts with bridges to allow for wildlife movement.</td>
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<td>During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should provide for continued movement of wildlife by assisting wildlife navigation through or across barriers in areas where wildlife corridors and nursery sites are identified in this document, adopted HCP/NCCPs, or movement studies that identify evidence of wildlife movement. Bridges and/or other undercrossings that allow continued movement of wildlife shall be incorporated where roads or transit features would create barriers to wildlife movement and use of nursery sites. Size-class-specific crossing structures shall be evaluated for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, aquatic barriers will be made passable for migratory fish species in order to have the functional effect of fish access to spawning and rearing habitats. Directional fencing shall be considered to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and/or other crossing structures. Where fencing stops, the fence should extend and angle away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, one-way gates should be used so animals that do get around fence end runs can safely exit roadways.</td>
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During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should provide for the maximum feasible continuing function of identified wildlife corridors by limiting edge effects of development. Corridor buffers, shielded and directed lighting, fencing, restriction of nonnative species in landscaping, maintaining natural landforms, and similar measures shall be implemented as needed to maintain function. Undercrossings and/or other crossing structures, such as culverts, may become filled with sand, silt, litter, debris, or dense vegetation rendering them unviable as corridors. Additionally, erosion can damage the integrity of directional fencing and the effectiveness of corridors can deteriorate over time. Therefore, fencing, undercrossings, and/or other crossing structures shall be monitored and maintained as needed to ensure corridor permeability and functionality. Development and implementation of a fencing and wildlife crossing structure maintenance plan is recommended to maintain permeability for wildlife across corridors. Corridor design shall comply with all requirements of current HCP/NCCP planning documents and local ordinances including but not limited to the BMO.

Mitigation for impacts to wildlife nursery sites shall be accomplished by adherence to Mitigation Measures BIO-A through BIO-L.

During the design and CEQA review of individual projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should modify designs to ensure the maximum feasible level of consistency with the policies in adopted HCPs, NCCPs, or other approved local, regional, or state conservation plans. If no feasible alternative exists that is consistent with conservation plans, the project proponent shall coordinate with USFWS, CDFG, and the appropriate local agency to provide full compensation of acreage and preserve function, retaining or improving upon the size, configuration, and habitat value of the preserve. Projects shall follow adopted procedures to process an amendment to the conservation plan(s) if necessary. In addition, all habitat-based mitigation required by the conservation plans shall be provided at ratios or quantities specified in the plans.
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the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

**CULT-C**

During the planning, design, and environmental review phases of individual development projects and transportation network improvement projects implementing the 2050 RTP/SCS SANDAG shall and other implementing agencies can and should incorporate design measures in engineering documents to provide avoidance or minimization of impacts to significant archaeological or cultural resources. Archaeological or cultural resource sites identified as significant shall be avoided or mitigated by completion of a data recovery program conducted in compliance with CEQA and agency guidelines.

Site avoidance and preservation can include capping the site with gravel or construction fabric and 16 to 18 inches of sterile fill soil. Sites proposed for capping shall be indexed so future researchers have reasonable knowledge of the resources that have been protected. Capped sites can be landscaped with native, shallow rooted plants that are compatible with the surrounding biologic habitat. Suggested capping methods should be communicated to Interested Tribes for their review and Tribal recommendations shall be considered to the maximum extent feasible as capping plans are finalized. Passive uses for capped sites include trails, picnic areas, and play areas. Capped areas should not contain asphalt or landscaping with invasive root systems.

**CULT-D**

During construction of specific development projects and transportation network improvement projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should require areas determined to be of cultural significance to be monitored during the grading phase of individual projects by a qualified archeologist and Tribal monitor.

SANDAG shall and other implementing agencies can and should retain a Tribal monitor (at historic rates of compensation) or tribal representatives designated by the Tribal Council or chairperson, if so requested, to accompany a qualified archeologist to identify, and determine the significance of, cultural resources and/or sacred lands. Both the archeologist and tribal monitor shall observe ground-disturbing activities and/or other scientific surveying that may occur in preparation for construction activities.
Should an archaeological deposit and/or feature be encountered during construction activities, an Archaeological Data Recovery Program (ADRP) shall be prepared and implemented with consultation with Interested Tribes. Both the archeologist and tribal monitor should strive for agreement on the determined significance of an artifact or cultural resource. Once in agreement, either the archeologist or tribal monitor may divert or halt ground-disturbing activities for the purposes of implementing a data recovery program.

A data recovery program for archaeological sites consists of excavation of a percentage of the site (determined in consultation with the lead agency) to provide information necessary to answer significant research questions. Project implementation agencies shall integrate curation of all archaeological and/or historical artifacts and associated records in a regional center focused on the care, management, and use of archaeological collections. All Native American human remains and associated grave goods discovered shall be returned to their Most Likely Descendent and repatriated. The final disposition of artifacts not directly associated with Native American graves will be negotiated during consultation with Interested Tribes. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. Curated materials shall be maintained with respect for cultures and available to future generations for research.

Prior to construction of individual development projects and transportation network improvement projects implementing the 2050 RTP/SCS, SANDAG shall and other implementing agencies can and should consult with the NAHC and local tribes for each discretionary project at the onset and during the environmental review process and the preconstruction phases to determine if ethnographic resources and/or sacred lands are present within the project area, or its vicinity. Native American tribes shall be notified of project construction prior to obtaining grading permits and/or beginning ground-disturbing activities within a tribe’s traditional territory. SANDAG shall and other implementing agencies can and should request from Interested Tribes appropriate provisions to address the proper treatment of found cultural resources and Native American remains and consider including these provisions in applicable work plans to the maximum extent feasible.

If cultural resources and/or sacred lands are present, SANDAG shall and other implementing agencies can and should communicate with Interested Tribes during the design, construction, operation, and
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**Planning and Project Design**

prior to implementation of construction, SANDAG shall and other implementing agencies can and should communicate with Interested Tribes that place cultural significance on the project area. Outreach efforts between the Tribes and SANDAG or other implementing agencies shall be communicated quarterly during the design and construction phase for review and input. Where potential impacts are identified, grading and excavation activities shall avoid impacts to identified resources, as feasible.

**CULT-F**

If human or nonhuman remains are found, SANDAG shall and other implementing agencies can and should immediately suspend construction in the vicinity of the discovery and determine if the remains discovered are human or nonhuman. For human remains, the archeologist and Tribal monitor, if present, shall protect discovered remains and/or burial goods remaining in the ground from additional disturbances. In the event that the human remains are discovered to be Native American, project implementation agencies shall contact the NAHC so that a Most Likely Descendent can be identified as required under California Public Resources Code §5097.98. Through coordination with SANDAG (or other implementing agencies), the Most Likely Descendent will determine the ultimate disposition of the human remains in compliance with all applicable local, state, and federal laws. Whenever possible, areas in which Native American remains and/or burial goods are discovered shall be avoided and placed into protected open space.

**Paleontological Resources and Unique Geologic Features**

**PALEO-A**

If it is determined during the environmental review process that development projects and transportation network improvement projects implementing the 2050 RTP/SCS would be located within an area of high or moderate paleontological resource sensitivity or near a known unique geological feature, and would remove at least 2,500 cubic yards of soil from a previously unearthed area, SANDAG shall and other implementing agencies can and should require a qualified researcher to be stationed on-site to observe during grading operations and recover scientifically valuable specimens or enforce avoidance of the unique geologic feature. A certified paleontologist or qualified researcher shall be retained (or required to be retained) by the project-implementing agency prior to construction to establish procedures for surveillance and the preconstruction salvage of exposed resources if fossil-bearing rocks or unique geologic features have the potential to be impacted. The monitor shall provide preconstruction coordination with contractors, oversee original cutting in previously undisturbed areas of sensitive geologic...
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**Mitigation Measure**

**Geology, Soils, and Minerals**

**Soil Erosion**

**GEO-A** During project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should develop detailed erosion control mitigation measures tailored to the project and site to be developed and included in the SWPPP upon application for a Construction General Permit. During construction, implementing agencies can and should avoid construction on unstable slopes and erosion-prone areas where possible, use special construction techniques to minimize erosion, and manage on-site grading to maximize the capture and retention of on-site runoff by creating perimeter ditches, trenches, siltation ponds, or similar depressions. Low-impact development (LID) design features, including drought-

**Environmental Justice**

**EJ-A** There is a potential for disproportionate impacts from the forecasted transportation network improvements and regional growth related to range of environmental impacts. These impacts would be highly localized, however, and analyses would be required at the project level to accurately ascertain any potential disproportionate impacts. Subsequent project-specific environmental review, including an environmental justice analysis, will be completed per CEQA and NEPA, as applicable, to further analyze the forecasted improvements to determine how environmental impacts may accrue to communities of concern. In the event that environmental justice impacts are determined to occur, SANDAG shall and other implementing agencies can and should develop mitigation measures that may include increased outreach to communities of concern, more culturally specific outreach strategies to target specific community of concern populations, the involvement of community leaders in project planning and/or design, or the establishment of working groups with community of concern members to help guide the development of the project and communicate project impacts to the community, among other mitigation measures developed at that time that may improve communication and involvement between the agency and community stakeholders.
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<td>The 19 incorporated cities and the County of San Diego, when updating the Conservation Element of their General Plans, can and should identify locations with known mineral resources and adopt policies and objectives to conserve the land most suitable for mineral resource extraction from development of incompatible land uses. Local jurisdictions shall pay particular attention to lands with known aggregate supply sources, as identified in the 2011 San Diego Region Aggregate Supply Study, with the intention to manage the region’s aggregate resources during the lifespan of the 2050 RTP/SCS.</td>
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<td>During project-specific design and CEQA review of transportation facilities, SANDAG shall and other implementing agencies can and should minimize impacts on known mineral resources through the evaluation of alternate route alignments and transportation facilities that conserve the land most suitable for mineral resource extraction from development of transportation uses. SANDAG and other implementing agencies shall pay particular attention to lands with known aggregate supply sources, as identified in the 2011 San Diego Region Aggregate Supply Study, with the intention to manage the region’s aggregate resources during the lifespan of the 2050 RTP/SCS.</td>
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<td>GHG-A</td>
<td>SANDAG shall update future Regional Comprehensive Plans and Regional Transportation Plans/Sustainable Community Plans to incorporate policies and measures that lead to reduced GHG emissions. Such policies and measures may be derived from the General Plans, local jurisdictions’ Climate Action Plans, and other adopted policies and plans of its member agencies that include GHG mitigation and adaptation measures or other sources.</td>
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<td>San Diego region cities and the County government can and should adopt and implement Climate Actions Plans (also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions) that contain the following information:</td>
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<td>a) Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within their respective jurisdictions;</td>
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<td>b) Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;</td>
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<td>c) Identify and analyze the GHG emissions resulting for specific actions or categories of actions anticipated within their respective jurisdictions;</td>
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<td>d) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;</td>
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<td>e) Establish a mechanism to monitor the plan’s progress toward achieving that level and to require amendment if the plan is not achieving specified levels; and</td>
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<td>f) Be adopted in a public process following environmental review.</td>
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CAPs should, when appropriate, incorporate planning and land use measures from the California Attorney General’s latest list of example policies to address climate change at both the plan and project level.

Specifically, at the plan level, land use plans should, when appropriate, incorporate planning and land use measures from the California Attorney General’s latest list of example policies to address climate change (http://ag.ca.gov/globalwarming/pdf/GP_policies.pdf), including, but not limited to policies from that web page such as:

- Smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, incentives and fees, zoning, and public-private partnerships
- Create transit, bicycle, and pedestrian connections through planning, funding, development
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<td>Planning and Project Design</td>
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<td>requirements, incentives and regional cooperation, and create disincentives for auto use</td>
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<tr>
<td>• Energy and water-efficient buildings and landscaping through ordinances, development fees, incentives, project timing, prioritization, and other implementing tools</td>
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<td>In addition, they should also incorporate, when appropriate, policies to encourage implementation of the Attorney General’s list of project specific mitigation measures available at the following web site: [<a href="http://ag.ca.gov/globalwarming/pdf/">http://ag.ca.gov/globalwarming/pdf/</a> GW_mitigation_measures.pdf](<a href="http://ag.ca.gov/globalwarming/pdf/">http://ag.ca.gov/globalwarming/pdf/</a> GW_mitigation_measures.pdf), including, but not limited to measures from the web page such as:</td>
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<td>• Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation</td>
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<td>• Build or fund a major transit stop within or near development</td>
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<td>• Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers</td>
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<td>• Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments</td>
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<td>• Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.</td>
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<td>They should also incorporate, when appropriate, planning and land use measures from additional resources listed by the California Attorney General at the following web page: <a href="http://ag.ca.gov/globalwarming/ceqa/resources.php">http://ag.ca.gov/globalwarming/ceqa/resources.php</a>.</td>
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<td>SANDAG will assist local governments in preparing CAPS and other climate strategies through continued implementation of the SANDAG Climate Action Strategy and Energy Roadmap Program. The Climate Action Strategy provides a toolbox of land use, transportation, and related policy measures and investments that help implement the 2050 RTP/SCS through reducing GHG emissions. Policy measures also are identified for buildings and energy use, protecting transportation and energy infrastructure from climate impacts, and to help SANDAG and local jurisdictions reduce GHGs from their operations. Through the Energy Roadmap Program, SANDAG will continue to provide energy planning assistance to local</td>
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governments to reduce local energy-related GHG emissions. SANDAG’s Climate Action Strategy can be found at: http://www.sandag.org/uploads/publicationid/publicationid_1481_10940.pdf.

In addition, CAPs should also incorporate analysis of climate change adaptation, in recognition of the likely and potential effects of climate change in the future regardless of the level of mitigation (San Diego Foundation Focus 2050 report) and in conjunction with Executive Order S-13-08, which seeks to enhance the State’s management of climate impacts including sea level rise, increased temperatures, shifting precipitation, and extreme weather events by facilitating the development of State’s first climate adaptation strategy.

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GHG-C

SANDAG shall and implementing agencies can and should require Best Available Control Technology (BACT) during construction and operation of projects, including:

- a) Solicit bids that include use of energy and fuel efficient fleets;
- b) Solicit preference construction bids that use BACT;
- c) Employ use of alternative fueled vehicles;
- d) Use lighting systems that are energy efficient, such as LED technology;
- e) Use CEQA Guidelines Appendix F, Energy Conservation, to create an energy conservation plan;
- f) Streamline permitting process to infill, redevelopment, and energy-efficient projects;
- g) Use an adopted emissions calculator to estimate construction-related emissions;
- h) Use the minimum feasible amount of GHG-emitting construction materials that is feasible;
- i) Use of cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- j) Use of lighter-colored pavement where feasible;
- k) Recycle construction debris to maximum extent feasible; and
- l) Plant shade trees in or near construction projects where feasible.
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### Hazards and Hazardous Materials

**HM-A**
SANDAG shall and other implementing agencies can and should require the implementation of bank stabilization improvements and erosion control measures near transportation infrastructure, such as major highways and transit centers, after wildfires.

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**HM-B**
SANDAG shall and other implementing agencies can and should consider additional wildfire risks caused by climate change in the design and environmental review of development projects and transportation network improvements implemented as part of the 2050 RTP/SCS. SANDAG shall and other implementing agencies can and should incorporate climate change adaptation measures into the project design, where feasible. Example adaptation measures could include, but are not limited to, such as designing buffer zones in areas within the WUI to reduce fuel adjacent to high population centers; ensuring sufficient emergency water supply for existing and new projects by working with water management agencies and plans; building and remodeling existing structures to be more fire resistant; minimizing exposure to and loss from fire hazards by avoiding, where feasible, development in high risk areas or designing developments in high-risk areas with ignition-resistant construction; and establishing fuel management strategies in high risk areas.

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### Hydrology and Water Quality

**WQ-A**
During project-specific design and CEQA review, SANDAG shall and other implementing agencies can and should develop detailed erosion control mitigation measures tailored to the project and site to be developed and included in the SWPPP upon application for a Construction General Permit. During construction, implementing agencies can and should avoid construction on unstable slopes and erosion-prone areas where possible; use special construction techniques to minimize erosion; and manage on-site grading to maximize the capture and retention of on-site runoff by creating perimeter ditches, trenches, siltation ponds, or similar depressions. Low-impact development (LID) guidance provided by the Governor's Office of Planning and Research (http://www.opr.ca.gov/ceqa/pdfs/Technical_Advisory_LID.pdf) as well as other implementing agencies such as the County’s LID Handbook shall be used to select LID design features. These features including drought-tolerant landscaping, shall be incorporated into each drainage design to the maximum extent practicable. Where permanent, postconstruction BMPs are specified (e.g., detention/retention systems), features shall be utilized for temporary sediment trap devices during construction. In addition, agencies can and should develop an...
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**Erosion Control and Revegetation Plan**

- Erosion control and revegetation plan for the project site to delineate measures to minimize soil loss and prevent short-term and long-term significant soil erosion problems. Routine site inspections should be made to assess long-term effectiveness of soil erosion control.

**Land Use**

**LU-A**

For transportation facility widening projects, Trolley line extensions, and double-tracking of the LOSSAN and SPRINTERT corridors, SANDAG shall and other implementing agencies can and should implement feasible alignments, design options, and other design features that avoid or substantially reduce impacts on community character and cohesion, and avoid or substantially reduce conflicts with land use plans. To achieve this objective, SANDAG shall and implementing agencies should coordinate with cities and San Diego County early in the planning process for these facilities to identify potentially significant land use impacts and address them through the facility planning and design process.

**LU-B**

SANDAG shall, and San Diego region cities and the County of San Diego can and should, review and reevaluate the SCS land use pattern in future years as growth occurs to consider whether continued increased density in urban areas or continued expansion of spaced rural residential use into existing undeveloped lands would be necessary. SANDAG shall revise the SCS land use pattern in future RTP updates to be consistent with the latest updates to local general plans, and to reduce the potential for long-term impacts on community character. In addition, in future updates of the Regional Comprehensive Plan (RCP), SANDAG will continue to coordinate with the local cities and the County of San Diego to update the Smart Growth Concept Map and identify areas of the region where additional growth could be accommodated to coincide with the increased investment in transit.

**Noise**

**NOI-A**

- SANDAG shall and other implementing agencies responsible for design and operation of individual projects that would generate operational source noise from infrastructure changes (such as transit stations, electrical substations, etc.) can and should implement the following design features, in locations that are near noise-sensitive receptors:
  - New and expanded permanent noise sources, such as transit stations, will receive a full project-level environmental acoustical analysis to ensure that noise level increases are within acceptable limits.
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<td>• Noise reduction components such as buffer zones, barriers, site design, and grade separation will be implemented as determined by project-level analysis to ensure that noise level increases are within acceptable limits. Local governments can and should use any land use design practices such as buffer zones, barriers, site design, and grade separation techniques to ensure that noise levels are reduced to the extent feasible.</td>
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<td><strong>NOI-B</strong></td>
<td>SANDAG shall and other implementing agencies responsible for design and operation of individual projects that would generate transportation noise (i.e., transportation network improvements and other changes in service or changes to routes or infrastructure related to rail or motor vehicles) can and should implement the following design features, in locations that are near noise-sensitive receptors:</td>
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<td>• New and expanded transit corridors and features such as new rail tracks, double-tracking, interstate ramps, transit stations, and transit-only lanes will receive a full project-level environmental acoustical analysis to ensure that noise level increases are within acceptable limits.</td>
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<td>• Noise reduction components such as buffer zones, barriers, corridor routing, site design, grade separation, and electric-powered vehicles will be implemented as determined by project-level analysis to ensure that noise level increases are within acceptable limits. An analysis of alternative designs for noise reduction components is also recommended.</td>
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<td>• For all new at-grade rail crossings, Federal Rail Administration Quiet Zones requirements will be met and approved by both the FRA and the local government, as funding is available. Quiet Zones are at grade rail crossings that have met specific FRA safety criteria for reducing or eliminating the requirement for locomotives to blast their horns.</td>
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<td><strong>NOI-C</strong></td>
<td>SANDAG shall and other implementing agencies responsible for approval of or construction of individual projects (both development projects and transportation network improvements) should implement the following mitigation measures to reduce noise levels generated by on-site construction-equipment:</td>
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<td>• Where feasible, project construction and related activities shall occur during permitted hours in accordance with local jurisdiction regulations.</td>
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<td>• Construction equipment will be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All impact tools will be shrouded or shielded and all intake and exhaust ports on power equipment will be muffled or shielded.</td>
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<td>• Construction equipment will not be idled for extended periods of time in the vicinity of noise-sensitive receptors.</td>
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<td></td>
<td>• Fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) will be located as far as possible from noise-sensitive receptors.</td>
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<td>• Provided that pile driving would be necessary for construction due to geological conditions, pile holes will be predrilled to the maximum feasible depth. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.</td>
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<td><strong>NOI-D</strong></td>
<td>SANDAG shall and other implementing agencies can and should implement the following mitigation measures to reduce groundborne vibration and noise levels generated by on-site construction-equipment:</td>
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<td>• When construction activity must take place within 45 feet of a sensitive receptor, smaller rubber-tired equipment will be used.</td>
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<td>• If pile driving would be necessary for construction due to geological conditions within 290 feet of any sensitive receptor, pile holes will be predrilled to the maximum feasible depth. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground reducing pile diving vibration to a smaller area.</td>
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<td>PH-A</td>
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For transportation network improvements, SANDAG shall and other implementing agencies can and should develop design strategies for application at the project level to avoid or reduce the temporary or permanent acquisition of residential and nonresidential property. For projects with the potential to displace homes and/or businesses, SANDAG shall and other implementing agencies can and should evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. If an alternate route would use existing rights-of-way or avoid or reduce the number of homes or businesses displaced, the route should be considered as a project alternative and studied for feasibility.

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<th>Public Services, Utilities, and Energy</th>
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During the CEQA review process for individual facilities, San Diego region cities, the County of San Diego, and special districts with responsibility for the construction of new wastewater treatment and collection facilities or the expansion of existing facilities to adequately meet projected capacity needs can and should apply necessary mitigation measures to reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality and others that apply to specific construction or expansion of wastewater treatment and collection facilities projects.

| US-B                                  |            |

During the CEQA review process for individual development projects, San Diego region cities, the County of San Diego and special districts with responsibility for project approval can and should apply necessary mitigation measures to conserve water and reduce the generation of wastewater. Such measures should be imposed through conditions required to be followed by those directly involved in the design, construction, and operation of projects.
# Mitigation Measure

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<td><strong>Stormwater Drainage Facilities</strong></td>
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| **US-C** | During the CEQA review process for individual facilities, SANDAG shall and San Diego region cities, the County of San Diego, and other implementing agencies with responsibility for the construction of new storm water drainage facilities or the expansion of existing facilities to adequately meet projected capacity needs can and should apply necessary mitigation measures, including actions set forth in regional watershed management plans, to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of storm water drainage facilities projects. | | | |}
| **Solid Waste Disposal** | | | | | |
| **US-D** | SANDAG shall and San Diego region cities, and the County of San Diego can and should support the San Diego region’s implementation of (1) the IWMA through identification of the need for new landfills and possible sites through the preparation of the CIWMP, and regular updates to the Countywide Siting Element every 5 years; and (2) solid waste recycling, composting, and other waste reduction programs. | | | |}
<p>| <strong>US-E</strong> | During the CEQA review process, San Diego region energy providers and energy regulatory agencies with responsibility for the construction or approval of new natural gas, electricity, and transportation fuel facilities or the expansion of existing facilities to adequately meet projected capacity needs can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of natural gas and electric facilities projects. | | | |</p>
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During the CEQA review process for individual development projects, San Diego region cities, the County of San Diego and special districts with responsibility for project approval can and should apply necessary mitigation measures to reduce energy consumption and promote the use of renewable energy. Such measures should be imposed through conditions required to be followed by those directly involved in the design, construction, and operation of projects.

The 19 incorporated cities, the County of San Diego, and special districts with responsibility for the construction of new recreation facilities or the expansion of existing facilities can and should acquire parkland concurrent with forecasted development through the Quimby Act and other means described in Section 4.15.2 of the 2050 RTP/SCS EIR, and use local plans, ordinances, and other means to acquire parkland and recreation facilities as their populations increase to adequately meet projected needs.

During project-specific design and CEQA review, the 19 incorporated cities, the County of San Diego, and special districts with responsibility for the construction of new or expanded recreation facilities, including recreational trails, can and should apply mitigation measures to avoid or substantially reduce construction and operational impacts on air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and other resources.

SANDAG, working with local jurisdictions and other transportation planning agencies, including Caltrans, shall reevaluate regional travel times, land use changes, and regional growth during the development of each RTP/SCS, occurring every four years. When feasible, SANDAG shall in future RTP/SCSs modify the timing and priority of transportation network improvements to be consistent with available funding programs to most quickly implement those improvements that would reduce impacts T-3 and T-4 to less than significant levels.
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<td>WS-A: Water Supply</td>
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Local governments can and should implement all feasible water conservation measures, including, but not limited to, those measures and policies regarding water efficiency, conservation, capture, and reuse identified by water suppliers and in local government general plans during the CEQA review process for individual development projects. For example, water conservation measures could include:

- Educating the public regarding water conservation, greywater use, and water storage and capture strategies.
- Requiring new construction and major renovations of all residential and nonresidential developments to meet the following standards:
  - Achieve a reduction of water use to be 40 percent less than baseline for buildings as calculated by the Energy Policy Act of 1992.
  - Reduce water consumption for outdoor landscape irrigation, consistent with the most recent local government policies.
- Comply with all prevailing state laws and local government regulations regarding indoor and outdoor water conservation and efficiency in new construction.
  - Installation of drought-tolerant landscaping, drip irrigation systems for landscaping where appropriate, and low-flow fixtures in bathrooms and kitchens.
  - Require efficient irrigation systems and encourage the use of native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping.
  - Maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces.
  - Require development to minimize the use of directly connected impervious surfaces and to retain stormwater runoff caused from the development footprint at or near the site of generation.
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<tr>
<td></td>
<td>Districts</td>
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</table>

WS-B: SANDAG shall and other implementing agencies can and should utilize reclaimed water (also known as recycled water) to the greatest extent feasible during design and construction of the projects implementing the 2050 RTP/SCS, to minimize potential impacts to the San Diego regional water supply. Recycled water can be used to fill lakes, ponds, and ornamental fountains; to irrigate parks, campgrounds, golf courses, freeway medians, community greenbelts, and school athletic fields; and to control dust at construction sites. Recycled water can also be used in certain industrial processes and for flushing toilets and urinals in nonresidential buildings. For example, local firms have dual-plumbed buildings to allow the use of recycled water for toilet and urinal flushing and for use in cooling towers. Recycled water could also be used for street sweeping purposes.

WS-C: During the CEQA review process for individual facilities, San Diego region cities, the County of San Diego, and special districts with responsibility for the construction of new water treatment and collection facilities or the expansion of existing facilities to adequately meet forecasted capacity needs can and should apply necessary mitigation measures to reduce significant environmental impacts associated with the construction or expansion of such facilities. The environmental impacts associated with such construction or expansion should be avoided or reduced through the imposition of conditions required to be followed by those directly involved in the construction or expansion activities. Such conditions should include those necessary to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, cultural resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of water treatment and collection facilities projects.
Appendix B

Air Quality Planning and Transportation Conformity

Appendix Contents

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Background

The federal Clean Air Act (CAA), which was last amended in 1990, requires the U.S. Environmental Protection Agency (EPA) to set national ambient air quality standards (NAAQS) for pollutants considered harmful to public health and the environment. California has adopted state air quality standards that are more stringent than the NAAQS. Areas with levels that exceed the standard for specified pollutants are designated as non-attainment areas.

The U.S. EPA requires that each state containing non-attainment areas develop plans to attain the NAAQS by a specified attainment deadline. These attainment plans are called State Implementation Plans (SIPs). The San Diego County Air Pollution Control District (APCD) prepares the San Diego portion of the California SIP. Once the standards are attained, further plans—called maintenance plans—are required to demonstrate continued maintenance of the NAAQS.

Pursuant to 176(c) of the federal Clean Air Act (42 USC §7506(c)), the San Diego Association of Governments (SANDAG) and the U.S. Department of Transportation (DOT) must make a determination that the Regional Transportation Plan (RTP) and the Regional Transportation Improvement Program (RTIP) conform to the SIP for air quality. Conformity to the SIP means that transportation activities will not create new air quality violations, worsen existing violations, or delay the attainment of the NAAQS.


On April 15, 2004, the U.S. EPA designated the San Diego air basin as non-attainment for the 1997 Eight-Hour Ozone Standard. This designation took effect on June 15, 2004.

The air basin initially was classified as a basic non-attainment area under Subpart 1 of the CAA, and the attainment date for the 1997 Eight-Hour Ozone Standard was set as June 15, 2009. However, the U.S. EPA, in response to a court decision, is expected to rule in 2011 that the San Diego basic non-attainment area be reclassified as a Subpart 2 Serious non-attainment area, with a maximum statutory attainment date of June 15, 2013. Final U.S. EPA action on this proposed reclassification has yet to be taken.

Several areas that are tribal lands in eastern San Diego County were excluded from the 1997 Eight-Hour Ozone Standard non-attainment designation. As shown in Figure B.1, the following are attainment areas for the 1997 Eight-Hour Ozone NAAQS: La Posta Areas #1 and #2, Cuyapaipie, Manzanita, and Campo Areas #1 and #2.
Figure B.1

Eastern San Diego County Attainment Areas for the Eight-Hour Ozone NAAQS

October 2011

Data Source: US EPA, Region 9 GIS Center
1997 Eight-Hour Ozone Standard
In cooperation with the San Diego APCD and SANDAG, the California Air Resources Board (CARB) developed an Eight-Hour Ozone Attainment Plan for the 1997 Eight-Hour Ozone Standard, which was submitted to the U.S. EPA on June 15, 2007. The budgets in the Eight-Hour Ozone Attainment Plan for San Diego County were found adequate for transportation conformity purposes by the U.S. EPA, effective June 9, 2008.

The San Diego region also has been designated by the U.S. EPA as a federal maintenance area for the Carbon Monoxide (CO) Standard. On November 8, 2004, CARB submitted the 2004 revision to the California SIP for CO to the U.S. EPA. Effective January 30, 2006, the U.S. EPA has approved this maintenance plan as a SIP revision.

Transportation Conformity: Modeling Procedures

Introduction

SANDAG has developed the Revenue Constrained Scenario of the 2050 San Diego RTP to meet the required air quality conformity analysis. Conformity of the 2010 RTIP Amendment No. 13 has been determined simultaneously for consistency purposes. Tables B.2 and B.4 include the conformity analysis for both the 2050 Revenue Constrained RTP and the 2010 RTIP Amendment No. 13. The 2050 RTP provides information on revenue assumptions and the Revenue Constrained Scenario (Chapter 5). In addition, this conformity determination fulfills the requirements of SB 375, which requires a Sustainable Communities Strategy that allows for compliance with Section 176 of the federal Clean Air Act. (California Government Code, Section 65080(b)(2)(B)(iii)).

2050 RTP Air Quality Conformity Methodology

While the horizon year of this RTP is 2050, the current version of the emissions model approved by the U.S. EPA, EMission FACtors (EMFAC) 2007 only contains emission factors to 2040. Because no other emissions model is approved for use in conformity determinations by metropolitan planning organizations (MPOs) in California, staff explored options under the Transportation Conformity Rule to conduct the air quality conformity determination for the 2050 RTP.

SANDAG staff conducted interagency consultation on the proposed methodology for preparing the 2050 RTP air quality conformity analysis with the San Diego Region Conformity Working Group (CWG) at its August 4 and September 1, 2010, meetings. The CWG is comprised of staff representatives from SANDAG, the San Diego APCD, Caltrans, CARB, the U.S. DOT and U.S. EPA.

The CWG concurred with the proposed methodology. On September 17, 2010, the SANDAG Transportation Committee accepted, for review and distribution, the draft proposed methodology for conducting the air quality conformity determination for the 2050 RTP for a 30-day comment period. A public hearing on shortening the conformity timeline and the proposed methodology for the regional emissions analysis was held at the October 15, 2010, SANDAG Transportation Committee meeting. No comments were received at the hearing or in writing. The SANDAG Board of Directors approved the proposed methodology for conducting the 2050 RTP air quality conformity analysis on November 19, 2010.
In concurrence with the approved methodology, SANDAG staff conducted the Air Quality Conformity Analysis for the 2050 RTP for 2011 through 2040, with the analysis years of 2018, 2020, 2030, and 2040. SANDAG conducted a regional emissions analysis (for information purposes only) for 2050. To perform the informational analysis for 2050, SANDAG used the 2050 travel data from the SANDAG transportation model as input into EMFAC 2007 for the last year of the EMFAC 2007 model (2040).

Growth Forecasts

Every three to five years, SANDAG produces a long-range forecast of population, housing, and employment growth for the San Diego region. The most recent is the 2050 Regional Growth Forecast, which the SANDAG Board of Directors accepted on February 26, 2010, for planning purposes.

The forecast process relies on three integrated forecasting models. The first one, the Demographic and Economic Forecasting Model (DEFM), provides a detailed econometric and demographic forecast for the entire region. The second one, the Interregional Commuting Model, provides a forecast of commuting between the San Diego region, Orange County, southwest Riverside County, Imperial County, and Tijuana/Northern Baja California. The third one, the Urban Development Model, allocates the results of the first two models to subregional areas based upon the current plans and policies of the jurisdictions.

In April 2010, SANDAG consulted with the San Diego Region CWG on the use of the 2050 Regional Growth Forecast for the air quality conformity analysis for the 2050 RTP conformity determination and the CWG concurred. Previously, both the U.S. DOT and the U.S. EPA concurred that approved plans should be used as input in the air quality conformity process. Figure B.2 and Table B.1 show the regional population, jobs, and housing growth forecast for the San Diego region through 2050.

The 2050 Regional Growth Forecast is based largely on the adopted general plans and community plans and policies of the 18 cities, and in some cases, includes draft plans that are nearing completion. Because many of the local general plans have horizon years of 2030 – 20 years before the 2050 Growth Forecast horizon year – the later part of the forecast was developed in collaboration with each of the local jurisdictions through an iterative process that allowed each city to provide its projections for land uses in those later years. For unincorporated areas, the forecast is based on the County’s referral alternative draft of the General Plan update, with additional constraints included for sensitive habitat areas.

![Figure B.2 – San Diego Regional Population, Jobs, and Housing Forecast](image_url)

Source: 2050 Regional Growth Forecast, SANDAG, February 2010
Transportation Modeling

SANDAG follows a widely used, four-step transportation modeling process of trip generation, trip distribution, mode choice, and assignment to forecast travel activity in the San Diego region. After a first pass through the four steps, a feedback process is used to pass congested travel conditions back into trip distribution and through to assignment. After several feedback iterations, a final pass is made through the mode choice and assignment steps to reflect congested travel conditions in mode decision-making. Travel model results are then combined with additional post-process input and output functions to form the complete modeling chain. For the first time, a truck model is run parallel to the four-step model. Truck origin-destination trip tables are merged with vehicle trip tables for highway assignment and air quality procedures.

The estimates of regional transportation-related emissions analyses meet the requirements established in the Transportation Conformity Rule, 40 CFR Sections 93.122(b) and 93.122(c). These requirements relate to the procedures to determine regional transportation-related emissions, including the use of network-based travel models, methods to estimate traffic speeds and delays, and the estimation of vehicle miles of travel. TransCAD 5.0 is the transportation planning computer package used by SANDAG to provide a framework for performing much of the computer processing involved with modeling, and it is used for the trip distribution and assignment steps. Another software package used extensively in the modeling process is ArcInfo. This Geographic Information System (GIS) maintains, manipulates, and displays transportation, land use, and demographic data. SANDAG has written numerous programs that provide a linkage between TransCAD and ArcInfo. Other custom programs perform some modeling functions, such as trip generation and mode choice. A number of data files and surveys are used to calibrate the transportation models. These include:

- 1995 San Diego Region Travel Behavior Study
- 2006 San Diego Household Travel Study
- 2001 Caltrans Statewide Travel Survey
- 2001-2003 San Diego Regional Transit Survey
- External Trip Surveys (2006 Interregional Travel Behavior Study)
- Traffic Generation Studies

### Table B.1 – San Diego Regional Population and Employment Forecast

<table>
<thead>
<tr>
<th>Year</th>
<th>Population</th>
<th>Civilian Employment</th>
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<tbody>
<tr>
<td>2008</td>
<td>3,131,552</td>
<td>1,411,811</td>
</tr>
<tr>
<td>2020</td>
<td>3,535,000</td>
<td>1,515,346</td>
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<tr>
<td>2030</td>
<td>3,870,000</td>
<td>1,648,361</td>
</tr>
<tr>
<td>2040</td>
<td>4,163,688</td>
<td>1,773,399</td>
</tr>
<tr>
<td>2050</td>
<td>4,384,867</td>
<td>1,898,769</td>
</tr>
</tbody>
</table>

Source: 2050 Regional Growth Forecast, SANDAG, February 2010
In addition to model parameters derived from these surveys and studies, there are three major inputs to the transportation models:

- Growth forecast inputs used to describe existing and planned land use patterns and demographic characteristics
- Highway networks used to describe existing roadway facilities and planned improvements to the roadway system
- Transit networks used to describe existing and planned public transit service

Highway Networks

The regional highway networks in the 2050 RTP include all roads classified by local jurisdictions in their general plan circulation elements. These roads include freeways, expressways, and the Regional Arterial System (RAS). The RAS consists of all conventional state highways, prime arterials, and selected major streets. In addition, some local streets are included in the networks for connectivity between zones.

The route improvements and additions in the 2050 RTP are developed to provide adequate travel service that is compatible with adopted regional policies for land use and population growth. All regionally significant projects are included in the quantitative emissions analysis. These include all state highways, all proposed national highway system routes, all regionally significant arterials, and all “other principal arterials” functionally classified by the Federal Highway Administration.

The networks also account for programs intended to improve the operation of the highway system, including High Occupancy Vehicle (HOV) lanes, Managed Lanes, and ramp metering. Existing and proposed toll facilities also are modeled to reflect time, cost, and capacity effects of these facilities. State Route 125 (SR 125) South, SR 11, SR 241, and additional lanes on Interstate 15 (I-15) north of SR 78 as well as additional lanes on I-5 north of Vandegrift Boulevard are modeled toll facilities included in the Revenue Constrained Plan for the San Diego region.

In addition, several managed/HOV lanes are included in the Revenue Constrained Plan. Facilities with proposed Managed Lanes include I-5, I-15, and I-805; and SR 52, SR 54, SR 78, SR 94, and SR 125. Managed Lanes are defined as reversible HOV routes or HOV routes with two or more lanes in the peak direction. Additionally, one-lane HOV facilities that operate as two-person carpool lanes in the earlier years of the plan transition to Managed Lanes by 2035. It is assumed that the excess capacity not used by carpools and transit on these facilities would be managed, so that single occupant vehicles could use these lanes under a pricing mechanism. Traffic flows would be managed so that the facility would operate at level of service D or better.
Based on the networks and programs described above, the transportation forecasts of the 2050 RTP differentiate among eight highway modes:

- Drive alone non-toll
- Drive alone toll
- Shared-ride non HOV/non-toll
- Shared-ride HOV/non-toll
- Shared-ride HOV/toll
- Light – heavy-duty
- Medium – heavy-duty
- Heavy – heavy-duty

SANDAG maintains a master highway network from which a specific-year network between the years 2008 (the 2050 Regional Growth Forecast base year) and 2050 can be built. Four networks were built and verified (2018, 2020, 2030, and 2040) for air quality conformity analyses of the 2050 RTP. A network also was built and verified for the year 2050 for an air quality analysis for informational purposes.

A list of the major highway and near-term regional arterial projects included in the conformity analysis, along with information on phasing for their implementation, is included in Tables A.4 and A.8, located in Appendix A. Locally funded, regionally significant projects also have been included in the air quality conformity analysis. These projects are funded with TransNet funds, a 20-year, half-cent local sales tax for transportation that expired in 2008; TransNet Extension funds, a 40-year, half-cent local sales tax extension approved by voters in 2004 that expires in 2048; and other local revenue sources.

**Transit Networks**

SANDAG also maintains transit network datasets for existing and proposed transit systems. Most transit routes run over the same streets, freeways, HOV lanes, and ramps used in the highway networks. As a result, the only additional facilities that are added to the transportation coverage for transit modeling purposes are:

- Trolley and commuter rail lines
- Streets used by buses that are not part of local general plan circulation elements

Seven transit modes group routes with similar operating characteristics. They are:

- Commuter Rail
- Trolley/Light Rail
- Bus Rapid Transit (BRT)
- Rapid Bus
- Limited-Express Bus
- Express Bus
- Local Bus

BRT service would have stations similar to commuter rail and light rail, and operating characteristics midway between rail and bus service. BRT service would be provided by advanced design buses operating on HOV lanes or Managed Lanes, some grade-separated transit ways, and surface streets with priority transit systems. Once TransCAD transit networks have been built, TransCAD finds minimum time paths between transit access points (TAPs). TAPs are selected transit stops that are used to represent walk and auto access to the transit system.
The following four sets of paths are created for modes:

- A.M. Peak-period local bus
- A.M. Peak-period premium service
- Midday local bus
- Midday premium service

Bus speeds assumed in the transit networks are derived from modeled highway speeds and reflect the effects of congestion. Regional and express transit routes on surface streets are assumed to operate out of congestion due to priority transit treatments. Higher bus speeds may result for transit vehicles operating on highways with HOV lanes and HOV bypass lanes at ramp meters, compared with those routes that operate on highways where these facilities do not exist.

In addition to transit travel times, transit fares are required as input to the mode choice model. TransCAD procedures replicate the San Diego region’s complex fare policies which differ among:

- Buses, which collect a flat fare of between $1 and $4, depending on the type of service
- Trolleys, which charge $2.50 for all trips
- SPRINTER, which charges $2
- Commuter rail (COASTER), which has a zone-based fare of between $5 and $6.50
- Proposed regional BRT routes, which are assumed to charge $4
- Proposed Rapid Bus routes, which are assumed to charge $2.50

Fares are expressed in 1999 dollars (consistent with household incomes from the 2050 Regional Growth Forecast) and are assumed to remain constant in inflation-adjusted dollars over the forecast period.

Near-term transit route changes are drawn from the Coordinated Plan, which was produced in cooperation with the region’s transit agencies. Longer-range improvements are proposed as a part of the RTP development and other transit corridor studies. In addition to federal and state funded projects, locally funded transit projects that are regionally significant have been included in the air quality conformity analysis of the 2050 RTP. These transit projects also are funded with TransNet funds or other local revenue sources. Once network coding is completed, the transportation models are run for the applicable scenarios (2018, 2020, 2030, 2040, and 2050 (for informational purposes)). A list of major regional transit projects included in the draft air quality conformity analysis, as well as information on phasing their implementation, is included in Table A.5, located in Appendix A.

Trip Generation

A trip generation analysis is the first step in the transportation modeling process. Average weekday trip ends, by all forms of transportation and starting and ending in each zone, are estimated for ten trip types:

- Home-to-work
- Home-to-college
- Home-to-school
- Home-to-shop
- Home-to-other
The model computes person trips, which account for all forms of transportation – including automobiles, trucks, taxicabs, motorcycles, public transit, bicycling, and walking.

The trip-generation model works by applying trip rates to zone-level growth forecasts. The model calculates each of the trip ends separately as trip productions and attractions. Trip production rates are expressed as trips per household, while trip production rates vary by trip type and structure type. Trip attractions are expressed as trips per acre of nonresidential land use or trips per household. Trip attraction rates vary by trip type and land use category. The 2050 Regional Growth Forecast was used to produce trip-generation forecasts for the years 2018, 2020, 2030, 2040, and 2050. Trip generation rates were established by utilizing data from traffic generator studies, as well as expanding rates from the 1995 San Diego Region Travel Behavior Study, the 2006 San Diego Household Travel Study, and the 2001 Caltrans Statewide Travel Survey.

The model reduces future year person-trips by a small amount to reflect the increased use of teleworking and e-commerce. Reduction factors of 1, 3, or 5 percent were applied to selected trip purposes and land uses. Telework reduction factors depend on the likelihood that the land use type would have employee categories that could feasibly telecommute. Reduction factors start in the year 2020.

The truck model follows a process similar to the one followed by the person model. The model computes truck vehicle trips for heavy-duty trucks, including light heavy-duty, medium heavy-duty, and heavy heavy-duty trucks. The truck classifications correspond to the CARB truck classifications used in the air quality model EMFAC. Trip production and attraction rates are expressed as trips per employee, and the rates vary by employee industry category.

**Trip Distribution**

After the trip generation analysis is completed, trip movements between zones are determined using a form of the trip distribution model known as the doubly-constrained, gamma-function gravity model. Inputs to the trip distribution model include zone-level trip generation forecasts by trip type, zone-to-zone impedances, and gamma function parameters by trip type and 4D category. 4D index categories attempt to define locations by their density, diversity, distance, and urban design characteristics. A high 4D index value represents areas that would be considered smart growth and would result in shortened trip lengths. In this way, the model is designed to reflect changing trip patterns in response to the types of new development in land use scenarios. The model also modifies trip patterns as new roadways are added.

A truck trip distribution analysis is performed in a similar manner, but it is used to distribute vehicle trips rather than person-trips by purpose, as in the person model. The truck model also uses different distribution parameters by vehicle type, which are not segmented by 4D category.
The model is calibrated to match observed trip length frequencies from the 2006 Household Travel Study and the 2001 Caltrans Statewide Travel Survey. Zone-to-zone impedances are a composite measure of peak and off-peak travel times and costs by highway, transit, and non-motorized modes.

Mode Choice
At this point in the modeling process, total person-trip movements between zones are split into different forms of transportation by highway, transit, and non-motorized modes (bicycling and walking). Highway modes include drive-alone non-toll, drive-alone toll, shared-ride non HOV/non-toll, shared-ride HOV/non-toll, and shared-ride HOV/toll. Nine transit modes differentiate transit trips by three ride modes (rail, BRT, and bus) and three access modes (walk, drive, and drop-off). The mode choice model is designed to link mode use to demographic assumptions, highway network conditions, transit system configuration, land use alternatives, parking costs, transit fares, and auto operating costs. Trips between zone pairs are allocated to modes based on the cost and time of traveling by a particular mode, compared with the cost and time of traveling by other modes. For example, vehicle trips on a congested route would be more likely to be diverted to light rail than vehicle trips on an uncongested freeway.

Income level also is considered, because lower-income households tend to own fewer automobiles and therefore make more trips by transit and carpooling. People in higher income households tend to choose modes based on time and convenience rather than cost. The mode choice model is calibrated using the 1995 San Diego Travel Behavior Study and the 2006 Household Travel Study trip tables by mode and income, as well as 2001-2003 Regional Transit Survey transit trip characteristics. Regional-level Census 2000 work-trip mode shares also were used to fine tune mode-share estimates.

Highway and transit travel times reflect highway congestion effects from the final iteration of the feedback loop. The model produces a.m. peak, p.m. peak, and off-peak period trip tables for vehicles and transit riders. The a.m. peak period is from 6 to 9 a.m. and the p.m. peak period is from 3 to 6 p.m. The off-peak period covers the remaining 18 hours of the day.

Highway and Transit Assignment
Highway assignment produces traffic-volume estimates for all roadway segments in the system. These traffic volumes are an important input to emissions modeling. Similarly, transit trips are assigned to transit routes and segments.

Highway
SANDAG loads traffic using the TransCAD Multimodal Multiclass Assignment function. Before loading the traffic onto the network, the three truck modes are combined with the five passenger vehicle modes. Multi-class assignment allows SANDAG to assign the eight vehicle modes (as defined in the highway network section) in one combined procedure.

The highway assignment model works by finding roads that provide the shortest travel impedance between each zone pair. Trips between zone pairs are then accumulated on road segments making up minimum paths. Highway impedances consider posted speed limits, signal delays, congestion delays, and costs. The model computes congestion delays for each segment based on the ratio of the traffic volume to roadway capacity. Motorists may
choose different paths during peak hours, when congestion can be heavy and during off-peak hours, when roadways are typically free flowing. For this reason, traffic is assigned separately for a.m. peak, p.m. peak, and off-peak periods. Vehicle trip tables for each scenario reflect increased trip-making due to population growth and variations in travel patterns due to the alternative transportation facilities/networks proposed.

Model accuracy is assessed by comparing model estimated traffic volumes with actual traffic counts obtained through the SANDAG traffic monitoring program and the Highway Performance Monitoring System estimates of Vehicle Miles of Travel (VMT).

After completing the highway assignments, additional processing is needed. Adjustments are made for calibration error volume, HOV/managed lane volume, bus volumes, hourly distribution factors, Level of Service, and travel time.

Transit
For transit assignment, TransCAD software assigns TAP-to-TAP transit trips to the network. Eight separate transit assignments are produced for peak and off-peak periods, walk and auto access, and local bus and premium service. These individual assignments are summed to obtain total transit ridership forecasts.

Before assigning transit trips, external transit trips coming into San Diego from outside the region need to be added to the internal transit trips estimated by the mode choice model. Currently, few transit trips enter from the north or east. However, more than 20,000 transit trips cross the Mexican border each day. To account for these trips, an external transit trip table for the base year is developed from on-board transit ridership surveys and factored to future years based on border crossing trends.

For accuracy, transit ridership forecasts from the transit assignment model are compared with transit counts from the SANDAG transit passenger counting program to determine whether transit modeling parameters need to be adjusted.

Some of these comparisons of model-estimated boardings with actual boardings include:

- System-level boardings, which may reveal transfer rate problems and lead to changes to the transfer wait time factor in the mode choice model
- Boardings by mode, which may reveal modal biases and lead to changes in mode choice modal constants
- Boardings by frequency of service, which may show biases that lead to changes in the first wait factor in the mode choice model
- A Centre City screenline crossing, which may lead to changes in parking costs and boardings by stop location, which may indicate problems with specific generators, such as a university

Post-TransCAD Processing
Standard TransCAD output needs to be reformatted and adjusted to be useful for emissions modeling. Several routines and computer programs have been written to accomplish the following major functions:

- Correcting link-specific traffic volume forecasts for calibration errors
- Adding in estimated travel on roads not in the transportation modeling process
- Computing link speeds based on corrected link volumes, highway capacity manual relationships between congestion and speed (or signal delay)
- Splitting link volumes into heavy-duty truck and other traffic to obtain speed distributions by vehicle class
- Preparing a data set that contains total VMT, number of trip starts, and VMT by speed category by time of day for each vehicle class

The travel demand modeling procedures used for the 2050 RTP differ from previous modeling procedures in three key ways, as described in the previous sections. To summarize, first a truck model is run parallel to the four-step model. Truck origin-destination trip tables are merged with vehicle trip tables for highway assignment and air quality procedures. Second, new inputs are used, including the recently completed 2010 Freight Gateway Study (a forecast of freight traffic in the region), 2002 Freight Analysis Framework data, and the 2050 Regional Growth Forecast projections. Third, a 4D (density, diversity, distance, and urban design characteristics) category is used as an input into the trip distribution model. These new inputs and procedures have contributed to changes in output for emissions modeling.

**Motor Vehicle Emissions Modeling**

**Emissions Model**

In November 2006, CARB released EMFAC 2007, an emissions inventory model that calculates emissions for motor vehicles operating in California. It is an integrated model that combines emission rate data with vehicle activity to calculate regional emissions. The U.S. EPA approved EMFAC 2007 for use in conformity determinations on January 18, 2008. The EMFAC 2007 model supports the calculation of emissions for the Burden mode. The Burden mode is used for calculating regional emission inventories. In this mode, the model reports total emissions as tons per day for each pollutant, by vehicle class, and the total vehicle fleet. The Burden mode uses emission factors that have been corrected for ambient conditions and speeds combined with vehicle activity to calculate emissions in tons per day. Vehicle activity includes the number of vehicles, daily VMT, and the number of daily trips.

The air quality analysis of the 2050 RTP was conducted using the EMFAC 2007 Burden mode. Projections of daily regional emissions were prepared for reactive organic gases (ROG), nitrogen oxides (NOx), and CO.

On-road motor vehicle emissions are attributed to several different processes:

- Starting exhaust
- Running exhaust
- Idle exhaust (calculated for heavy-duty trucks only)
- Resting and diurnal evaporation
- Running losses
- Hot soak evaporation

Emission factors vary by vehicle class, fuel usage, and technology. The fuels modeled are gasoline, diesel, and electricity-powered vehicles. Technology categories can be grouped into catalyst, non-catalyst, and diesel. Thirteen vehicle classes are modeled:

- Passenger car
- Two types of light-duty trucks
Medium-duty truck
Two types of light heavy-duty trucks
Medium heavy-duty truck
Heavy heavy-duty truck
Line-haul vehicle
Urban bus
School bus
Motorcycle
Motor home

Emission factors for processes that vary by temperature (i.e., starting exhaust, hot soak, and running exhaust) are broken down further by specified temperature ranges. Exhaust emission factors also are broken down by speed range.

Regional Emissions Forecasts
Regional transportation forecasts were initiated in December 2010. Output from the TransCAD model was then reformatted and adjusted to be useful for emissions modeling.

Eight-Hour Ozone Standard
Effective June 9, 2008, the U.S. EPA found the eight-hour ozone budgets included in the Eight-Hour Ozone Attainment Plan for San Diego County adequate for transportation conformity purposes. Beginning in December 2010, SANDAG prepared countywide forecasts of average weekday ROG and NOx emissions for 2018, 2020, 2030, 2040, and 2050 (for informational purposes) using the EMFAC 2007 model. ROG and NOx emissions are based on the summer season.

The analysis years were selected to comply with 40 CFR Sections 93.106(a)(1) and 93.118(a) of the Transportation Conformity Rule and the approved methodology for conducting the 2050 RTP Air Quality Conformity Analysis, which shortened the conformity horizon to 2040 and requires an informational analysis of the plan horizon year (2050). According to these sections of the Conformity Rule, the first horizon year (2018) must be within ten years from the base year used to validate the regional transportation model (2008), the last horizon year must be the last year of the transportation plan’s forecast period, or in the case of the 2050 RTP, the last year of the conformity determination (2040), and the horizon years may be no more than ten years apart (2020 and 2030).

CO Standard
CO regional emissions were projected for 2018, 2020, 2030, 2040, and 2050 (for informational purposes) for the conformity determination of the 2050 RTP. CO emissions are based on the winter season.

Emissions Modeling Results
An emissions budget is the part of the SIP that identifies emissions levels necessary for meeting emissions reduction milestones, attainment, or maintenance demonstrations.

To determine conformity of the 2050 RTP, the plan must comply with the emissions analysis described in the Regional Emissions Forecast section. Table B.2 shows that projected ROG and NOx emissions from the 2050 RTP are below the ROG and NOx budgets.

Adjustment factors for ROG and NOx were provided by CARB to account for recently-adopted emission control programs not reflected in EMFAC 2007 and other corrections. Table B.3 includes the adjustment factors by analysis year.
Table B.4 shows that projected CO emissions from the 2050 RTP are below the 2003 CO budget of 730 tons per day.

**Exempt Projects**

Section 93.126 of the Transportation Conformity Rule exempts certain highway and transit projects from the requirement to determine conformity. The categories of exempt projects include safety, mass transit, air quality (ridesharing and bicycle and pedestrian facilities), and other (such as planning studies).

Table B.5 illustrates the exempt projects considered in the 2050 Revenue Constrained RTP. This table shows short-term exempt projects. Additional unidentified projects could be funded with revenues expected to be available from the continuation of existing state and federal programs.
There are four federally-approved Transportation Control Measures (TCMs) that must be implemented in San Diego, which the SIP refers to as transportation tactics. They include ridesharing, transit service improvements, traffic-flow improvements, and bicycle facilities and programs.

These TCMs were established in the 1982 SIP, which identified general objectives and implementing actions for each tactic. The TCMs have been fully implemented. Ridesharing, transit, bicycling, and traffic-flow improvements continue to be funded, although the level of implementation established in the SIP has been surpassed.

Table B.4 – 2050 Revenue Constrained RTP Air Quality Conformity Analysis for Carbon Monoxide (EMFAC 2007)

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Weekday Vehicle Starts (1,000s)</th>
<th>Average Weekday Vehicle Miles (1,000s)</th>
<th>SIP Emissions Budget Tons/Day</th>
<th>CO Emissions Tons/Day</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>14,760</td>
<td>85,073</td>
<td>730</td>
<td>231</td>
</tr>
<tr>
<td>2020</td>
<td>14,979</td>
<td>86,115</td>
<td>730</td>
<td>207</td>
</tr>
<tr>
<td>2030</td>
<td>16,396</td>
<td>98,912</td>
<td>730</td>
<td>158</td>
</tr>
<tr>
<td>2040</td>
<td>17,676</td>
<td>107,715</td>
<td>730</td>
<td>144</td>
</tr>
<tr>
<td>2050(2)</td>
<td>18,942</td>
<td>117,825</td>
<td>730</td>
<td>157</td>
</tr>
</tbody>
</table>

(2) The emission data for 2050 was prepared using 2040 emission factors, as emission factors for 2050 are not available. The 2050 RTP air quality conformity analysis was conducted for the years 2011 – 2040. Emissions data for 2050 is included for informational purposes only.

Note: Emissions budgets for the San Diego region are from 2004 Revision to California State Implementation Plan for Carbon Monoxide, Updated Maintenance Plan for Ten Federal Planning Areas (Approved as a SIP revision in January 2006).
<table>
<thead>
<tr>
<th>Project/Program Description</th>
<th>Project/Program Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bikeway, Rail Trail, and Pedestrian Projects</strong></td>
<td></td>
</tr>
<tr>
<td>Bayshore Bikeway</td>
<td>Maple Street Pedestrian Plaza</td>
</tr>
<tr>
<td>Bay-to-Ranch Bikeway</td>
<td>Mid-County Bikeway</td>
</tr>
<tr>
<td>Border Access Bicycle Corridor</td>
<td>Mira Mesa Bicycle Corridor</td>
</tr>
<tr>
<td>Camp Pendleton Trail</td>
<td>Mission Valley – Chula Vista Bicycle Corridor</td>
</tr>
<tr>
<td>Carlsbad – San Marcos Bicycle Corridor</td>
<td>North Park – Centre City Bicycle Corridor</td>
</tr>
<tr>
<td>Central Coast Bicycle Corridor</td>
<td>Otay Mesa Port of Entry Pedestrian/Bicycle Facilities</td>
</tr>
<tr>
<td>Chula Vista Greenbelt</td>
<td>Park Boulevard Bicycle Connector</td>
</tr>
<tr>
<td>City Heights – Old Town Bicycle Corridor</td>
<td>Poway Bicycle Loop</td>
</tr>
<tr>
<td>Clairemont – Centre City Bicycle Corridor</td>
<td>San Diego Regional Bicycle Plan</td>
</tr>
<tr>
<td>Coastal Rail Trail</td>
<td>San Diego River Multi-Use Bicycle and Pedestrian Path</td>
</tr>
<tr>
<td>East County Northern Bicycle Loop</td>
<td>San Luis Rey River Trail</td>
</tr>
<tr>
<td>East County Southern Bicycle Loop</td>
<td>Santee – El Cajon Bicycle Corridor</td>
</tr>
<tr>
<td>El Camino Real Bicycle Corridor</td>
<td>SR 52 Bikeway</td>
</tr>
<tr>
<td>Encinitas – San Marcos Bicycle Corridor</td>
<td>SR 56 Bikeway</td>
</tr>
<tr>
<td>Escondido Creek Bike Path Bridge and Bikeway</td>
<td>SR 56/Black Mountain Road Bikeway Interchange</td>
</tr>
<tr>
<td>Gilman Bicycle Connector</td>
<td>SR 125 Bicycle Corridor</td>
</tr>
<tr>
<td>Hillcrest – El Cajon Bicycle Corridor</td>
<td>SR 905 Bicycle Corridor</td>
</tr>
<tr>
<td>Imperial Beach Bicycle Connector</td>
<td>Sweetwater River Bikeway</td>
</tr>
<tr>
<td>Inland Rail Trail</td>
<td>Tecate International Border Crossing Pedestrian Facilities</td>
</tr>
<tr>
<td>Interstate 8 Bicycle Corridor</td>
<td>Ted Williams Parkway Pedestrian Bridge at Shoal Creek</td>
</tr>
<tr>
<td>Interstate 15 Bikeway</td>
<td>Third Avenue Bicycle and Pedestrian Access</td>
</tr>
<tr>
<td>Interstate 805 Bicycle Corridor</td>
<td>Vista Way Bicycle Connector</td>
</tr>
<tr>
<td>Kearny Mesa – Beaches Bicycle Corridor</td>
<td>West Bernardo Bike Path</td>
</tr>
<tr>
<td>Kensington – Balboa Park Bicycle Corridor</td>
<td></td>
</tr>
</tbody>
</table>
Interagency Consultation Process and Public Input

The consultation process followed to prepare the Air Quality Conformity Analysis for the 2050 RTP complies with the San Diego Transportation Conformity Procedures adopted in July 1998. In turn, these procedures comply with federal requirements under 40 CFR 93. Interagency consultation involves SANDAG (as the MPO for San Diego County), APCD, Caltrans, CARB, U.S. DOT, and U.S. EPA. In addition, pursuant to Government Code Section 14522.2, the methodology and key assumptions of travel demand models are provided in Technical Appendix 15.

Consultation is a three-tier process that:

- Formulates and review drafts through a conformity working group
- Provides local agencies and the public with opportunities for input through existing regional advisory committees and workshops

- Seeks comments from affected federal and state agencies through participation in the development of draft documents and the circulation of supporting materials prior to formal adoption

SANDAG consulted on the development of the Air Quality Conformity Analysis of the 2050 RTP at meetings of the San Diego Region CWG, as follows:

- On August 4, 2010, SANDAG staff presented the RTP process and timeline, schedule for the 2050 RTP development, and information on some of the RTP conformity procedures, including the Public Involvement Plan, pollutant budgets and Transportation Control Measures. Additionally, staff presented the 2050 RTP Draft Proposed Conformity Analysis Methodology for review and comment by the CWG and requested any comments in writing by August 20, 2010.

Table B.5 – Exempt Projects (Continued)

<table>
<thead>
<tr>
<th>Project/Program Description</th>
<th>Project/Program Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety Improvement Program</td>
<td>Transportation Systems Management</td>
</tr>
<tr>
<td>Bridge Rehabilitation/Preservation/Retrofit</td>
<td>Automated Traveler Information System (ATIS)</td>
</tr>
<tr>
<td>Collision Reduction</td>
<td>Bus on Shoulder Service</td>
</tr>
<tr>
<td>Emergency Response</td>
<td>Compass Card</td>
</tr>
<tr>
<td>Hazard Elimination/Safe Routes to School</td>
<td>FasTrak®</td>
</tr>
<tr>
<td>Highway Maintenance</td>
<td>Freeway Service Patrol</td>
</tr>
<tr>
<td>Safety Improvement Program</td>
<td>Connected Vehicle Roadside Devices</td>
</tr>
<tr>
<td>Roadway/Roadside Preservation</td>
<td>Intermodal Transportation Management System (IMTMS)</td>
</tr>
<tr>
<td>Smart Growth Incentive Program</td>
<td>ITS Operations</td>
</tr>
<tr>
<td>Transit Terminals</td>
<td>Joint Transportation Operations Center (JTOC)</td>
</tr>
<tr>
<td>Airport Intermodal Transit Center/Terminal</td>
<td>Trolley Fiber Communication Network</td>
</tr>
<tr>
<td>San Ysidro Intermodal Transit Center/Terminal</td>
<td>Universal Transportation Account</td>
</tr>
<tr>
<td>Various Traffic Signal/Prioritization</td>
<td></td>
</tr>
</tbody>
</table>
On September 1, 2010, SANDAG presented information on the 2050 Growth Forecast and the 2050 RTP Travel Demand Model. Staff also presented once more the 2050 RTP Draft Proposed Conformity Analysis Methodology, to provide the group with another opportunity to review the information and provide any comments. No comments were received.

On September 17, 2010, the SANDAG Transportation Committee accepted for review and distribution the draft proposed methodology for conducting the air quality conformity determination for the 2050 RTP for a 30-day comment period.

On October 6, 2010, SANDAG staff presented information on several conformity criteria and procedures for the development of the 2050 RTP, including 2050 RTP public outreach, latest emissions model, and draft revenue constrained financial assumptions.

On October 15, 2010, the SANDAG Transportation Committee held a public hearing to solicit public comments on shortening the conformity timeline and on the proposed methodology for the regional emissions analysis. No comments were received at the hearing or in writing.

On November 19, 2010, the SANDAG Board of Directors approved the 2050 RTP Conformity Analysis Methodology for use in the Draft 2050 RTP and its air quality conformity determination.

On December 17, 2010, the SANDAG Board of Directors selected the Revenue Constrained Transportation Network to be included in the Draft 2050 RTP and its Air Quality Conformity Analysis.

SANDAG staff initiated the air quality conformity modeling for the Draft 2050 RTP on December 17, 2010.

At the January 5, 2011, CWG meeting, SANDAG staff presented the 2050 RTP revenue constrained and exempt project lists.

On February 25, 2011, the Draft 2050 RTP Air Quality Conformity Analysis was released to the CWG for a 30-day review period.

At the March 2, 2011, CWG meeting, the Draft 2050 RTP Air Quality Conformity Analysis was discussed.

On April 22, 2011, the SANDAG Board of Directors released the Draft 2050 RTP, including its air quality conformity analysis, for a public review period that closed on July 8, 2011.

On July 26, 2011, the revised air quality conformity analysis document was released to the CWG for a 30-day review period that closed on August 26, 2011.

On August 1, 2011, the revised air quality conformity analysis document was released to the public for a 30-day review period that ended on August 31, 2011. No comments were received.

Members of the public have been welcomed to provide comments at meetings of the San Diego Region CWG, the Transportation Committee, and the SANDAG Board of Directors.
### POPULATION PROJECTIONS 2008-2050

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2008</th>
<th>2020</th>
<th>2035</th>
<th>2050</th>
<th>Change 2008-2050 numeric</th>
<th>percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carlsbad</td>
<td>103,406</td>
<td>117,667</td>
<td>125,338</td>
<td>129,352</td>
<td>25,946</td>
<td>25%</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>230,397</td>
<td>267,418</td>
<td>300,558</td>
<td>330,049</td>
<td>99,652</td>
<td>43%</td>
</tr>
<tr>
<td>Coronado</td>
<td>23,030</td>
<td>26,370</td>
<td>27,236</td>
<td>27,907</td>
<td>4,877</td>
<td>21%</td>
</tr>
<tr>
<td>Del Mar</td>
<td>4,561</td>
<td>4,800</td>
<td>4,978</td>
<td>5,151</td>
<td>590</td>
<td>13%</td>
</tr>
<tr>
<td>El Cajon</td>
<td>97,555</td>
<td>109,587</td>
<td>138,796</td>
<td>144,229</td>
<td>46,674</td>
<td>48%</td>
</tr>
<tr>
<td>Encinitas</td>
<td>63,615</td>
<td>68,551</td>
<td>74,268</td>
<td>76,675</td>
<td>13,060</td>
<td>21%</td>
</tr>
<tr>
<td>Escondido</td>
<td>143,259</td>
<td>154,635</td>
<td>165,505</td>
<td>177,559</td>
<td>34,300</td>
<td>24%</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>28,092</td>
<td>28,233</td>
<td>31,857</td>
<td>36,125</td>
<td>8,033</td>
<td>29%</td>
</tr>
<tr>
<td>La Mesa</td>
<td>56,445</td>
<td>62,136</td>
<td>68,682</td>
<td>78,174</td>
<td>21,729</td>
<td>38%</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>25,511</td>
<td>26,702</td>
<td>29,803</td>
<td>31,883</td>
<td>6,080</td>
<td>25%</td>
</tr>
<tr>
<td>National City</td>
<td>56,144</td>
<td>62,058</td>
<td>73,973</td>
<td>92,137</td>
<td>38,183</td>
<td>64%</td>
</tr>
<tr>
<td>Oceanside</td>
<td>178,102</td>
<td>195,592</td>
<td>212,366</td>
<td>217,108</td>
<td>39,006</td>
<td>22%</td>
</tr>
<tr>
<td>Poway</td>
<td>50,744</td>
<td>54,054</td>
<td>58,466</td>
<td>59,756</td>
<td>9,299</td>
<td>18%</td>
</tr>
<tr>
<td>San Diego</td>
<td>1,333,617</td>
<td>1,542,324</td>
<td>1,759,260</td>
<td>1,947,184</td>
<td>613,567</td>
<td>46%</td>
</tr>
<tr>
<td>San Marcos</td>
<td>82,419</td>
<td>90,794</td>
<td>103,238</td>
<td>105,467</td>
<td>23,056</td>
<td>28%</td>
</tr>
<tr>
<td>Santee</td>
<td>55,850</td>
<td>64,551</td>
<td>72,521</td>
<td>72,554</td>
<td>51,274</td>
<td>30%</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>13,447</td>
<td>14,134</td>
<td>15,249</td>
<td>15,969</td>
<td>2,520</td>
<td>19%</td>
</tr>
<tr>
<td>Vista</td>
<td>95,400</td>
<td>99,985</td>
<td>116,448</td>
<td>144,592</td>
<td>49,192</td>
<td>52%</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>489,958</td>
<td>545,409</td>
<td>644,589</td>
<td>692,917</td>
<td>202,959</td>
<td>41%</td>
</tr>
<tr>
<td><strong>Region Total</strong></td>
<td><strong>3,131,552</strong></td>
<td><strong>3,535,000</strong></td>
<td><strong>4,026,131</strong></td>
<td><strong>4,384,867</strong></td>
<td><strong>1,253,315</strong></td>
<td><strong>40%</strong></td>
</tr>
</tbody>
</table>

### JOBS (CIVILIAN + MILITARY) PROJECTIONS 2008-2050

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2008</th>
<th>2020</th>
<th>2035</th>
<th>2050</th>
<th>Change 2008-2050 numeric</th>
<th>percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carlsbad</td>
<td>61,999</td>
<td>70,228</td>
<td>80,949</td>
<td>87,109</td>
<td>25,110</td>
<td>41%</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>70,230</td>
<td>82,146</td>
<td>106,418</td>
<td>121,551</td>
<td>51,321</td>
<td>73%</td>
</tr>
<tr>
<td>Coronado</td>
<td>27,994</td>
<td>33,093</td>
<td>33,226</td>
<td>33,251</td>
<td>5,257</td>
<td>19%</td>
</tr>
<tr>
<td>Del Mar</td>
<td>4,065</td>
<td>4,149</td>
<td>4,528</td>
<td>5,028</td>
<td>963</td>
<td>24%</td>
</tr>
<tr>
<td>El Cajon</td>
<td>41,686</td>
<td>44,463</td>
<td>51,861</td>
<td>58,630</td>
<td>16,944</td>
<td>41%</td>
</tr>
<tr>
<td>Encinitas</td>
<td>26,985</td>
<td>28,711</td>
<td>30,746</td>
<td>31,481</td>
<td>4,496</td>
<td>17%</td>
</tr>
<tr>
<td>Escondido</td>
<td>61,143</td>
<td>66,803</td>
<td>72,558</td>
<td>74,915</td>
<td>13,772</td>
<td>23%</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>7,543</td>
<td>8,835</td>
<td>9,790</td>
<td>10,240</td>
<td>2,679</td>
<td>36%</td>
</tr>
<tr>
<td>La Mesa</td>
<td>27,579</td>
<td>28,813</td>
<td>31,018</td>
<td>32,018</td>
<td>4,439</td>
<td>16%</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>7,640</td>
<td>7,890</td>
<td>8,786</td>
<td>9,660</td>
<td>2,020</td>
<td>26%</td>
</tr>
<tr>
<td>National City</td>
<td>28,743</td>
<td>29,677</td>
<td>34,688</td>
<td>37,668</td>
<td>8,925</td>
<td>31%</td>
</tr>
<tr>
<td>Oceanside</td>
<td>43,977</td>
<td>48,464</td>
<td>57,810</td>
<td>67,550</td>
<td>23,573</td>
<td>54%</td>
</tr>
<tr>
<td>Poway</td>
<td>31,176</td>
<td>32,386</td>
<td>37,190</td>
<td>40,955</td>
<td>9,779</td>
<td>31%</td>
</tr>
<tr>
<td>San Diego</td>
<td>821,521</td>
<td>874,678</td>
<td>952,759</td>
<td>1,042,649</td>
<td>221,128</td>
<td>27%</td>
</tr>
<tr>
<td>San Marcos</td>
<td>37,383</td>
<td>40,843</td>
<td>50,990</td>
<td>61,604</td>
<td>24,221</td>
<td>65%</td>
</tr>
<tr>
<td>Santee</td>
<td>15,304</td>
<td>16,949</td>
<td>20,261</td>
<td>26,554</td>
<td>11,250</td>
<td>74%</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>7,533</td>
<td>7,823</td>
<td>8,564</td>
<td>8,780</td>
<td>1,247</td>
<td>17%</td>
</tr>
<tr>
<td>Vista</td>
<td>41,315</td>
<td>44,693</td>
<td>53,891</td>
<td>61,293</td>
<td>19,978</td>
<td>48%</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>137,264</td>
<td>148,971</td>
<td>167,359</td>
<td>192,102</td>
<td>54,838</td>
<td>40%</td>
</tr>
<tr>
<td><strong>Region Total</strong></td>
<td><strong>1,501,080</strong></td>
<td><strong>1,619,615</strong></td>
<td><strong>1,813,372</strong></td>
<td><strong>2,003,038</strong></td>
<td><strong>501,958</strong></td>
<td><strong>33%</strong></td>
</tr>
</tbody>
</table>
### HOUSING PROJECTIONS 2008-2050

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2008</th>
<th>2020</th>
<th>2035</th>
<th>2050</th>
<th>Change 2008-2050</th>
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<tbody>
<tr>
<td></td>
<td>numeric</td>
<td>percent</td>
<td>numeric</td>
<td>percent</td>
<td>numeric</td>
</tr>
<tr>
<td>Carlsbad</td>
<td>43,496</td>
<td>7,063</td>
<td>50,224</td>
<td>7,063</td>
<td>16%</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>77,484</td>
<td>29,515</td>
<td>106,999</td>
<td>29,515</td>
<td>38%</td>
</tr>
<tr>
<td>Coronado</td>
<td>9,543</td>
<td>258</td>
<td>9,801</td>
<td>258</td>
<td>3%</td>
</tr>
<tr>
<td>Del Mar</td>
<td>2,535</td>
<td>71</td>
<td>2,606</td>
<td>71</td>
<td>3%</td>
</tr>
<tr>
<td>El Cajon</td>
<td>35,596</td>
<td>49,797</td>
<td>48,251</td>
<td>14,201</td>
<td>40%</td>
</tr>
<tr>
<td>Encinitas</td>
<td>24,805</td>
<td>28,484</td>
<td>28,135</td>
<td>3,679</td>
<td>15%</td>
</tr>
<tr>
<td>Escondido</td>
<td>47,412</td>
<td>54,596</td>
<td>53,164</td>
<td>7,184</td>
<td>15%</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>9,851</td>
<td>12,148</td>
<td>10,856</td>
<td>2,297</td>
<td>23%</td>
</tr>
<tr>
<td>La Mesa</td>
<td>25,019</td>
<td>32,566</td>
<td>28,985</td>
<td>7,547</td>
<td>30%</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>8,820</td>
<td>10,423</td>
<td>9,811</td>
<td>1,603</td>
<td>18%</td>
</tr>
<tr>
<td>National City</td>
<td>15,773</td>
<td>25,272</td>
<td>20,128</td>
<td>9,499</td>
<td>60%</td>
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### REGIONWIDE PROJECTIONS OF POPULATION, JOBS, HOUSING 1970-2050

![Graph showing projections of population, jobs, and housing from 1970 to 2050.](image-url)
A RESOLUTION OF THE SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG) BOARD OF DIRECTORS ADOPTING THE AIR QUALITY CONFORMITY DETERMINATION, FINDING THE SUSTAINABLE COMMUNITIES STRATEGY ACHIEVES THE REGIONAL GREENHOUSE GAS REDUCTION TARGETS, AND ADOPTING THE FINAL 2050 REGIONAL GROWTH FORECAST, AND THE 2050 SAN DIEGO REGIONAL TRANSPORTATION PLAN, INCLUDING ITS SUSTAINABLE COMMUNITIES STRATEGY

WHEREAS, SANDAG is the federally designated metropolitan planning organization (MPO), pursuant to Title 23 United States Code Sections 134(a) and (g), and the state designated Regional Transportation Planning Agency (RTPA) for the San Diego County region pursuant to California Public Utilities Code Section 132005; and

WHEREAS, Title 23, Part 450 and Title 49 of the Code of Federal Regulations (CFR), require SANDAG as the MPO to prepare and update a long-range Regional Transportation Plan (RTP) every four years; and

WHEREAS, Section 65080 et seq. of the California Government Code requires SANDAG as the RTPA to prepare and update a long-range RTP and Sustainable Communities Strategy (SCS) every four years; and

WHEREAS, on November 30, 2007, the SANDAG Board of Directors found the 2030 Revenue Constrained Regional Transportation Plan: Pathways for the Future in conformance with the State Implementation Plans (SIPs) for air quality, in accordance with the transportation conformity requirements contained in 40 CFR Part 51 and Part 93, as required by the 1990 Clean Air Act Amendments; and with the 2009 Regional Air Quality Strategy (RAQS), in accordance with California law; and

WHEREAS, from April 2009 through October 2011, through the conduct of a continuing, comprehensive, and coordinated transportation planning process in conformance with all applicable federal and state requirements, SANDAG developed its latest RTP with a 2050 horizon year (the “2050 RTP”), which incorporates an SCS for the San Diego region; and

WHEREAS, the 2050 RTP, including its SCS, contains an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system in the San Diego region through the year 2050 and calls for development of an integrated intermodal transportation system that facilitates the efficient, economic movement of people and goods; and

WHEREAS, the 2050 RTP considers, analyzes, and reflects, as appropriate, the metropolitan transportation planning process as identified in the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users of 2005 as well as the National Highway System Designation Act of 1995, and is based on reasonably available funding provisions; and
WHEREAS, the 2050 RTP serves as a Congestion Management Process identifying the most serious congestion problems and evaluating and incorporating, as appropriate, all reasonably available actions to reduce congestion, such as travel demand management and operational management strategies for all corridors with any proposed capacity increase; and

WHEREAS, SANDAG has conducted an air quality analysis of the 2050 RTP utilizing the latest planning assumptions, emissions model, and consultation provisions, including a quantitative regional emissions analysis that meets emissions budget requirements of the U. S. Environmental Protection Agency transportation conformity rule, and the 2050 RTP contributes to all required emissions reductions; and

WHEREAS, conformity of the proposed 2010 Regional Transportation Improvement Program Amendment No. 13 has been determined simultaneously with the 2050 RTP for consistency purposes; and

WHEREAS, transportation control measures (TCMs) from the 2009 RAQS and 1982 SIP for air quality have been given emphasis in the 2050 RTP Revenue Constrained Plan, which provides for the expeditious implementation of all applicable TCMs; and

WHEREAS, the Regional Growth Forecast was developed for planning purposes by working with local jurisdictions, and projects growth based on existing land use plans and policies, and demographic and economic trends; and

WHEREAS, the Preliminary 2050 Regional Growth Forecast was accepted by the SANDAG Board of Directors on February 26, 2010, for planning purposes; and

WHEREAS, a Technical Update to the 2050 Regional Growth Forecast (which is now the proposed Final 2050 Regional Growth Forecast) was accepted by the SANDAG Board of Directors on April 22, 2011, for release with the 2050 RTP and its SCS; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)((E) and federal public participation requirements, the 2050 RTP, including its SCS, was developed through a strategic, proactive, comprehensive public outreach and involvement program, which included: an adopted public participation plan; routine distribution of information to local/regional media to secure media coverage; advertising in local and regional newspapers; distribution of public information materials, such as brochures and newsletters; a robust speakers bureau effort; a dedicated Web site; an interactive Web-based visualization tool called Envision 2050; a community-based outreach program; a meeting on October 8, 2010, with representatives from the County Board of Supervisors and from all city councils, noticed to the clerks of the Board of Supervisors and cities, pursuant to Government Code Section 65080(b)(2)((E); seven noticed public hearings to receive testimony on the Draft 2050 RTP, its SCS, and the Environmental Impact Report; five subregional workshops in June 2011 to facilitate public comment on the Draft 2050 RTP; and interagency coordination and involvement; and
WHEREAS, pursuant to Government Code Section 65080(b)(2)(B), the SANDAG SCS: (i) identifies the general location of uses, residential densities, and building intensities within the region; (ii) identifies areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (iii) identifies areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (iv) identifies a transportation network to service the transportation needs of the region; (v) gathers and considers the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Government Code Section 65580.01; (vi) considers the state housing goals specified in Sections Government Code 65580 and 65581; and (viii) allows the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506); and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(G), the SCS considered spheres of influence adopted by the San Diego Local Agency Formation Commission; and

WHEREAS, pursuant to Government Code Section 65080(b)(2)(B)(vii), the SCS set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve the regional greenhouse gas emission targets set by the California Air Resources Board (CARB); and

WHEREAS, the CARB set the per capita greenhouse gas emission reduction targets for automobiles and light trucks for the San Diego region at 7 percent by 2020 and 13 percent by 2035 from a 2005 base year;

NOW THEREFORE

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

BE IT FURTHER RESOLVED THAT the SANDAG Board of Directors finds the 2050 RTP Revenue Constrained Plan is in conformance with the 2002 and 2004 SIPs for air quality, and the 2007 Eight-Hour Ozone Attainment Plan in accordance with the transportation conformity requirements contained in 40 CFR Part 51 and Part 93, as required by the 1990 Clean Air Act Amendments; and with the 2009 RAQS, in accordance with California law; and

BE IT FURTHER RESOLVED that the SANDAG Board of Directors finds that the 2050 RTP, including its SCS, achieves the regional greenhouse gas reduction targets established by the CARB and meets the requirements of Senate Bill 375 (Steinberg, 2008) as codified in Government Code §65080(b) et seq.; and
BE IT FURTHER RESOLVED that the SANDAG Board of Directors does hereby adopt the
Final 2050 RTP, including its SCS, and the Final 2050 Regional Growth Forecast for the San Diego
region; and

PASSED AND ADOPTED this 28th day of October 2011.

________________________________________           ATTEST: ________________________________________
CHAIRPERSON                   SECRETARY

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

ADVISORY MEMBERS: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County,
U.S. Department of Defense, San Diego Unified Port District, San Diego County Water Authority,
Southern California Tribal Chairmen's Association, and Mexico.
PUBLIC HEARING: FINAL REGIONAL HOUSING NEEDS ASSESSMENT PLAN FOR 2013-2020 HOUSING ELEMENT CYCLE

Introduction

The Regional Housing Needs Assessment (RHNA) process for the fifth housing element cycle was conducted by SANDAG in conjunction with the 2050 Regional Transportation Plan (RTP) and its Sustainable Communities Strategy (SCS) in accordance with Senate Bill 375 (Steinberg, 2008) (SB 375) and SB 575 (Steinberg, 2009). SANDAG is assigned this responsibility by state housing element law, and undertakes this process prior to each housing element cycle. The fifth housing element cycle covers the time period of January 1, 2013 – December 31, 2020 (eight years), and state law requires that housing elements be completed by April 27, 2013, 18 months following the adoption of the 2050 RTP and its SCS (Agenda Item No. 9A on the October 28, 2011, Board agenda). The synchronization and improved integration of transportation, housing, and land use planning are one of the objectives of SB 375, which will help the region meet the greenhouse gas reduction targets set by the California Air Resources Board.

On May 27, 2011, the Board of Directors accepted Draft RHNA Methodology and Allocation Option 2b for distribution and a 60-day public review. The public comments received and responses to the comments are presented in a summary matrix attached to this report (Attachment 3). Revisions to the Draft RHNA Methodology and Allocation Option 2b are not proposed; RHNA Methodology and Allocation Option 2b is included in the Final RHNA Plan (Attachment 2).

The Final RHNA Plan (Attachment 2) summarizes state law as it pertains to the RHNA; documents how the RHNA determination was made by the California Department of Housing and Community Development (HCD) in consultation with SANDAG; and describes the RHNA Methodology and Allocation, its various components, how it meets the objectives of state law and is consistent with the SCS, and the process used to develop it.
Discussion

Letters of Comment on Draft RHNA Methodology and Allocation

During the public review period and subregional workshops and public hearings held on the Draft RHNA Methodology and Allocation, 2050 RTP and its SCS, and 2050 RTP/SCS Environmental Impact Report (EIR), SANDAG received eleven letters of comment on the Draft RHNA Methodology and Allocation Option 2b, which are posted on the SANDAG 2011 – 2020 RHNA Web page. Letters were received from the cities of Chula Vista, Del Mar, Escondido, Lemon Grove, National City, Oceanside, Poway, and Santee; the San Diego Housing Federation; and Sustainable San Diego, and an e-mail from an individual named Corking Pearling.

The letters reflect a variety of views regarding Draft RHNA Methodology and Allocation Option 2b from support for Option 2b to concerns regarding its consistency with the 2050 RTP/SCS, whether the stated objectives in housing element law were met, the need to amend Board Policy No. 033, and reform of the housing element review process.

Responses to Comments on Draft RHNA Methodology and Allocation

Summary responses to the comment letters are provided below; detailed responses to each letter of comment are provided in Attachment 3. In addition, SANDAG staff met with the Cities of Chula Vista, Escondido, Lemon Grove, National City, and Oceanside to discuss the issues contained in their comment letters. Consistency with 2050 RTP/SCS – RHNA Option 2b is consistent with the 2050 RTP and its SCS. The land use pattern in the 2050 RTP/SCS and Final RHNA Plan is based on the 2050 Regional Growth Forecast, which is the foundation of both planning documents. The 2050 Forecast demonstrates that the region has a planned multifamily housing capacity of 74,737 units of 20 – 29 dwelling units/acre (du/ac) and 228,293 units of 30 or greater du/ac of capacity – for a total of 303,030 housing units of 20 du/ac or greater. The lower income housing need (30 or greater du/ac per the default densities in housing element law) in the region for the fifth housing element cycle is 64,150 units.

RHNA Objectives in State Housing Element Law – RHNA Option 2b is consistent with the four RHNA objectives (listed below) contained in state housing element law as described in the Final RHNA Plan. These objectives are consistent with the Regional Comprehensive Plan and Smart Growth Concept Map and include:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low- and very low-income households.

2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

3. Promoting an improved intraregional relationship between jobs and housing.

4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category.
RHNA Methodology and Allocation Option 2b meets the four objectives as described below:

1. It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.

2. It utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS.

3. It promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using the SANDAG forecasting model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.

4. It also moves toward improving the current distribution of lower income households in the region to reduce overconcentration. The allocation results in 15 out of 19 jurisdictions being within 5 percentage points of the 40 percent regional average for lower income households. Attachment 3 (Responses to Letters of Comment) provides more detail regarding how the Draft RHNA Methodology and Allocation Option 2b addresses the issue of overconcentration.

**Revision of Board Policy No. 033** - On July 22, 2011, an Ad Hoc Subcommittee of the Board of Directors was appointed to work on the revision of Board Policy No. 033, “Implementation Guidelines for SANDAG Regional Housing Needs Assessment Memorandum.” To date, the subcommittee has met twice on August 30 and October 7, 2011, and referred several potential amendments to the Regional Planning Technical Working Group (TWG) – the region’s planning directors – for technical input. The TWG will meet on November 10 to discuss technical issues associated with the amendments under discussion by the subcommittee, which is scheduled to meet again on November 18, 2011. The comments received on Board Policy No. 033 in the public comment letters on the Draft RHNA Methodology and Allocation have been transmitted to the subcommittee. A recommendation of the subcommittee is expected to be presented to the Board of Directors in December.

**Revisions to Housing Element Review Process** - Following the anticipated adoption of the RHNA in October, SANDAG is committed to working with the local jurisdictions and HCD to simplify and/or seek efficiencies and greater certainty in the housing element review process. Two of the letters of comment (City of Oceanside and City of Santee) identified specific issues to discuss with HCD.
Final RHNA Plan

Following the acceptance of the Draft RHNA Methodology and Allocation, SANDAG staff prepared a Draft RHNA Plan, which included RHNA Methodology and Allocation Option 2b that was accepted by the Board of Directors for distribution on May 27, 2011. The RHNA Plan summarizes state law as it pertains to the RHNA; documents how the RHNA Determination was made by the HCD in consultation with SANDAG; and describes the RHNA Methodology and Allocation, its various components, how it meets the objectives of state law and is consistent with the SCS, and the process used to develop it.

The TWG and Regional Housing Working Group provided input on the Draft RHNA Plan to SANDAG staff at their joint meeting on August 11, 2011. Their comments (which did not relate to the Draft RHNA Methodology and Allocation), included adding an employment and housing density map from the SCS, and adding text regarding the RHNA factors and how the RHNA relates to the principles of the SCS. SANDAG staff also made some internal technical edits. These revisions have been incorporated into the Final RHNA Plan dated October 28, 2011 (Attachment 2).

GARY L. GALLEGOS
Executive Director

Attachments: 1. Resolution No. 2012-10, adopting the Final RHNA Plan for the 2013-2020 housing element cycle for the San Diego region
2. Final Regional Housing Needs Assessment Plan, October 28, 2011
3. Responses to Letters of Comment on Draft RHNA Methodology and Allocation Option 2b

Key Staff Contact: Susan Baldwin, (619) 699-1943, sba@sandag.org
RESOLUTION ADOPTING THE FINAL REGIONAL HOUSING NEEDS ASSESSMENT PLAN FOR THE 2013 – 2020 (FIFTH) HOUSING ELEMENT CYCLE FOR THE SAN DIEGO REGION

WHEREAS, state housing element law requires that the San Diego Association of Governments (SANDAG) adopt a Regional Housing Needs Assessment (RHNA) Plan prior to the due date for each housing element cycle; and

WHEREAS, the Regional Comprehensive Plan adopted by SANDAG in July 2004 calls for increasing the supply of housing and providing greater housing choice for all income levels; and

WHEREAS, the RHNA Plan was prepared in conjunction with the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS) to improve the connection between planning for transportation, land use, and housing and to help meet the region’s greenhouse gas (GHG) reduction targets set by the California Air Resources Board as required by Senate Bill 375 (SB 375); and

WHEREAS, the 2050 Regional Growth Forecast is the foundation of both the 2050 RTP/SCS land use pattern and the RHNA for the fifth housing element cycle; and

WHEREAS, the California Department of Housing and Community Development (HCD) is required to consult with SANDAG in determining the existing and projected housing need for the region prior to each housing element cycle; and

WHEREAS, HCD provided SANDAG with a regional housing need number of 161,980 units distributed by four income categories based on the regional percentages of very low (22.5 percent), low (17.1 percent), moderate (18.9 percent), and above moderate (41.5 percent) income households from the 2000 U.S. Census; and

WHEREAS, SANDAG is required by state law to allocate the overall regional housing needs by jurisdiction and income category; and

WHEREAS, SANDAG with the assistance of the Regional Planning Committee and its working groups, including the Regional Planning Technical Working Group and Regional Housing Working Group, developed a number of potential methodologies for allocating the region’s housing needs by jurisdiction and income category; and

WHEREAS, these methodologies were consistent with the four RHNA objectives in state law and took into consideration local jurisdiction land use plans, market demand for housing, public facilities, suitable sites, commuting patterns, employment projections, percentage of lower income households, and other local planning and demographic factors and principles; and
WHEREAS, in accordance with state law the distribution of the housing needs seeks to reduce the concentration of lower income households in jurisdictions that already have disproportionately high proportions of lower income households; and

WHEREAS the allocation of and planning for the region’s future housing needs will assist the region in meeting its housing needs in all four income categories, meeting its GHG targets, addressing its transportation needs as identified in the 2050 RTP/SCS, and helping reduce vehicle miles travelled;

NOW THEREFORE

BE IT RESOLVED that the Board of Directors hereby adopts the Final RHNA Plan for the fifth housing element cycle (January 1, 2013 – December 31, 2020).

PASSED AND ADOPTED this 28th day of October 2011.

________________________________________   ATTEST: _______________________________________
CHAIRPERSON                     SECRETARY

MEMBER AGENCIES: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego.
ADVISORY MEMBERS: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, San Diego Unified Port District, San Diego County Water Authority, Southern California Tribal Chairmen’s Association, and Mexico.
Regional Housing Needs Assessment Plan
Fifth Housing Element Cycle
Planning for Housing in the San Diego Region
2010 - 2020
Acknowledgements

Many individuals aided in the preparation of material contained in the 2010-2020 Regional Housing Needs Assessment Plan for the Fifth Housing Element Cycle (January 1, 2013 - December 31, 2020). In particular, the cooperation and involvement of members of various SANDAG committees and working groups are acknowledged.

SANDAG Committees and Working Groups

SANDAG Board of Directors
Regional Planning Committee
Regional Planning Technical Working Group
Regional Housing Working Group

SANDAG Staff

Gary Gallegos, Executive Director
Renée Wasmund, Deputy Executive Director
Kurt Kroninger, Department Director of Technical Services
Charles “Muggs” Stoll, Department Director of Land Use and Transportation Planning
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Beth Jarosz, Senior Research Analyst
Ed Schafer, Senior Research Analyst
Kirby Brady, Research Analyst II
Oswaldo Perez, Regional Planner
Anne Steinberger, Communications Manager
Joey Hendrix, Document Processing Supervisor
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### Maps

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<td>San Diego Region</td>
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<td>2050 Transit Network and Higher Density Land Uses</td>
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Introduction

The preparation of the Regional Housing Needs Assessment (RHNA) for the San Diego region is a responsibility assigned to the San Diego Association of Governments (SANDAG) and other California councils of governments by state housing element law. The RHNA process is undertaken prior to each housing element cycle (see Appendix A for statutory excerpts regarding the RHNA requirements from the California Government Code). This RHNA is for the fifth housing element cycle (January 1, 2013 – December 31, 2020) and covers an eleven-year projection period (January 1, 2010 – December 31, 2020).

The RHNA process for the San Diego region was initiated in April 2010, and was completed on October 28, 2011, with the adoption of the RHNA Plan. The RHNA Plan describes the methodology developed to allocate the region’s housing needs in four income categories (very low, low, moderate, and above moderate) to the 18 cities and the unincorporated area of the County of San Diego in accordance with the objectives and factors contained in state law. It also discusses housing issues in the San Diego region, the 2050 Regional Growth Forecast (2050 Forecast), and the relationship of RHNA to the 2050 Regional Transportation Plan (RTP) and its Sustainable Communities Strategy (SCS).

Recent legislation, Senate Bill 375 (SB 375) (Steinberg, 2008) and SB 575 (Steinberg, 2009), affect the RHNA and fifth housing element cycle in several ways. The main changes in this cycle include the integration of the RHNA process with the RTP and SCS, required coordination/consistency with the RTP and its SCS per SB 375, and the length of the housing element cycle. The fifth cycle for the San Diego region covers an eight-year time period from January 1, 2013, to December 31, 2020; past housing elements were on a five-year cycle.
Planning for housing in the San Diego region

State law requires every city and county to prepare a housing element as part of its general plan. These housing elements are reviewed by the California Department of Housing and Community Development (HCD) for compliance with the law. Jurisdictions are required to identify adequate sites to address their very low, low, moderate, and above moderate income housing needs based on their RHNA allocations. In addition, each jurisdiction is required to submit an annual progress report on housing production by income category based on building permits issued, as well as on the status of their housing element program and policy implementation.

The RHNA process has three main components:

- RHNA Determination – HCD’s regional housing needs determination, in four income categories, for the region as a whole. HCD in consultation with SANDAG and using information from SANDAG’s regional growth forecast and the California Department of Finance population estimates, calculates a demographic housing need based on headship and vacancy rates, and household size. Unlike SANDAG’s regional growth forecasts, the RHNA Determination is not influenced by economic factors.
- RHNA Plan – SANDAG’s regional housing need plan includes a methodology for allocating a share of the RHNA Determination to each city and county in four income categories and information about RHNA process.
- RHNA – The RHNA is each local government’s regional housing needs allocation, which is required to be addressed in local housing elements.

In addition to the RHNA process, SANDAG works on other regional housing-related issues. The 2004 Regional Comprehensive Plan (RCP) includes a housing chapter that describes regional housing issues, goals and policies, and recommended actions. A Regional Housing Working Group with subregional local government representatives, housing industry representatives, and housing advocates meets quarterly to discuss housing-related legislation and regional housing issues (such as RHNA), and holds forums on topics of interest to the group. Past forums have been held on construction defect litigation, housing trust funds, condominium conversions, and housing element law. SANDAG also has partnered with the San Diego Housing Federation on several housing publications. More detailed information about SANDAG’s regional housing work can be found on our Web site (www.sandag.org).
**RHNA Objectives**

State housing element law (Government Code Section 65584 (d)) states that the RHNA shall be consistent with four objectives. These objectives are consistent with SANDAG’s RCP and Smart Growth Concept Map, and include:

- Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low and very low income households.

- Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

- Promoting an improved intraregional relationship between jobs and housing.

- Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category.

A key focus of state law is the requirement that local jurisdiction housing elements identify adequate sites zoned appropriately to address their RHNA allocations in all four income categories in their housing element. For the Very Low and Low Income RHNA units, jurisdictions generally are required to identify sites (both vacant and non-vacant) zoned at multifamily densities.
**SB 375: Integrating land use, housing, and transportation planning to reduce greenhouse gas emissions**

SB 375 calls for the coordination of housing planning with the RTP and SCS to help create more sustainable communities. In the past, the RHNA was undertaken independently from the RTP. SB 375 requires that the RHNA and RTP/SCS processes be undertaken together to better integrate housing, land use, and transportation planning to ensure that the state’s housing goals are met and to help reduce greenhouse gas (GHG) emissions from cars and light trucks. The law recognizes the importance of planning for housing and land use in creating sustainable communities where residents of all income levels have access to jobs, services, and housing using transit, or by walking and bicycling (see the Sustainable Communities Strategy chapter in the 2050 RTP for more detail regarding the SCS for the San Diego region).

In addition to the RHNA requirements of housing element law (Government Code Section 65584), SB 375 requires SANDAG to address the region’s housing needs in the SCS of the RTP. SB 375 states that the SCS will:

- Consider the state housing goals (Government Code Section 65080 (b)(2)(B)(vi));
- Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period for the RTP (out to 2050 for the 2050 RTP) taking into account net migration into the region, population growth, household formation, and employment growth (Government Code Section 65080 (b)(2)(B)(ii)); and
- Identify areas within the region sufficient to house an 8-year projection of the regional housing needs for the region (Government Code Section 65080 (b)(2)(B)(iii)).

The RHNA for the fifth housing element cycle was conducted by SANDAG in conjunction with the development of the 2050 RTP and its SCS in accordance with SB 375. The next update of the RTP will be adopted in 2015 (four year cycle), and the next RHNA process will occur in conjunction with the 2019 RTP (eight year cycle).

The RHNA and SCS identify the general location of uses, residential densities, and building intensities within the San Diego region based on each local jurisdiction’s general plans and housing element updates.

Depending on the number of housing units allocated by income category and local land use plans, the RHNA allocation may trigger amendments to a local jurisdiction’s general plan or changes to local zoning which are required to be completed within three years following adoption of the updated housing element.
Meeting greenhouse gas (GHG) targets

SB 375 calls for a land use pattern that will help meet regional GHG targets set forth by the California Air Resources Board (CARB) by improving transportation and land use coordination and jobs housing balance; creating more transit-oriented, compact, and walkable communities; providing more housing capacity for all income levels, and protecting resource areas (such as sensitive habitat areas and mineral resources) and farmland. SB 375 requires that the RHNA be consistent with the development pattern of the SCS; that the SCS show that it accommodates the RHNA; and that the SCS land use pattern, and therefore the RHNA, assist the region in meeting the GHG reduction targets set by the CARB in September 2010. SANDAG is developing the RHNA, SCS, and RTP in a way that assists the region in meeting its GHG targets. Together these plans show that the region will meet its GHG targets and achieve the other goals stated above by planning for land use and transportation in a more sustainable way.

The 2050 Forecast (approved for planning purposes by the SANDAG Board in February 2010, with a technical update in April 2011) serves as the foundation for the 2050 RTP/SCS land use pattern and the RHNA for the fifth housing element cycle. The 2050 Forecast identifies existing land uses, planned land uses (on vacant land and in redevelopment and infill areas), habitat conservation areas, agricultural lands, and development constraints, such as steep slopes, floodplains, and wetlands on a parcel level basis, which also are factors that housing element law requires to be considered in the development of the RHNA methodology.

The 2050 Forecast, RTP, SCS, and RHNA processes are iterative, each informing the other. Every four years a Forecast, RTP, and SCS will be adopted, and every eight years a RHNA will be adopted. Therefore if local jurisdictions make any changes to their land use and/or housing plans as a result of this RHNA allocation, changes will be reflected in the next RTP set to occur in 2015, and associated regional growth forecast.
2050 Regional Growth Forecast: Forecasting population, housing, and employment growth

The 2050 Regional Growth Forecast is one of the initial steps in developing the 2050 RTP, and is a key building block of the RTP, SCS, and RHNA. This forecast complies with all applicable statutes and regulations regarding the RTP, SCS, and RHNA from SB 375 and the California Transportation Commission’s RTP Guidelines. A summary of how the 2050 Forecast was developed, and how the information it provides is used in the RTP, SCS, and RHNA follows.

Land use data collected from cities and County

The 2050 Forecast is a locally-driven study with input from local jurisdiction staffs and elected officials on future planning and land use assumptions. The 2050 Forecast includes the number of housing units that are likely to be built based on policy and fiscal parameters. SANDAG staff solicited input on the 2050 Forecast from each jurisdiction at City Council, Board of Supervisors, and planning commission meetings over the course of six months. The information and comments collected during these meetings and subsequent interactions had a significant impact on formulating the region’s most likely development pattern over the next 40 years.

How land uses, jobs, housing, and transportation interact in the forecast model

The 2050 Forecast was developed through a multi-step, collaborative process involving input and review by a wide range of local, regional, and subject-area experts. The first step in the forecast process is to develop a regionwide growth projection of population, jobs, housing, and other demographic and economic characteristics. The regionwide projections are developed using the Demographic and Economic Forecasting Model (DEFM). DEFM uses demographic assumptions including age, ethnicity-specific birth rates, death rates, and migration trends (domestic and international); it also uses economic assumptions including labor force participation, labor productivity, and unemployment rates. The DEFM inputs, assumptions, and results were reviewed twice by a panel of subject-area experts, including representatives from local universities, economic and workforce development agencies, resource providers, public-sector partners (including the California Department of Finance and Department of Housing and Community Development), and key industries. The panel represented areas of expertise ranging from economic and demographic trends to housing and resource issues. The regionwide projections then become one input into the neighborhood-level (or jurisdiction level) forecast.
A key component of the neighborhood-level forecast is local land use data, developed through extensive collaboration with each of the 18 cities and the County of San Diego, as well as other land use agencies such as the tribal governments, Department of Defense, and universities with master plans (San Diego State University, California State University, San Marcos, and University of California, San Diego). The local land use inputs incorporate such information as existing development, general plans, constraints to development (e.g., floodplains, steep slopes, habitat preserves, historic districts, building height restrictions, and zoning), and permitted projects in the development pipeline. The final building blocks of the neighborhood-level forecast are proximity to existing job centers (along with travel time estimates and information on local commuting choice) and historical development patterns. How land in a neighborhood is used today, how it’s expected to be developed, how close the neighborhood is to job centers, and historical patterns of land use all contribute to a neighborhood’s expected future growth. Table 1 shows the distribution of projected housing units and jobs within the region as a whole and within the area addressed in the Urban Area Transit Strategy (the results of which were incorporated into the 2050 RTP/SCS), as well as other data from the 2050 Forecast.

Table 1: 2050 Regional Growth Forecast

<table>
<thead>
<tr>
<th></th>
<th>2008</th>
<th>2020</th>
<th>2035</th>
<th>2050</th>
<th>Numeric</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Population</strong></td>
<td>3,131,552</td>
<td>3,535,000</td>
<td>4,026,131</td>
<td>4,384,867</td>
<td>1,253,315</td>
<td>40%</td>
</tr>
<tr>
<td>Household Population</td>
<td>3,033,985</td>
<td>3,405,068</td>
<td>3,873,175</td>
<td>4,210,591</td>
<td>1,176,606</td>
<td>39%</td>
</tr>
<tr>
<td>Group Quarters Population</td>
<td>97,567</td>
<td>129,932</td>
<td>152,956</td>
<td>174,276</td>
<td>76,709</td>
<td>79%</td>
</tr>
<tr>
<td><strong>Jobs</strong></td>
<td>1,501,080</td>
<td>1,619,615</td>
<td>1,813,372</td>
<td>2,003,038</td>
<td>501,958</td>
<td>33%</td>
</tr>
<tr>
<td>Civilian Jobs</td>
<td>1,411,811</td>
<td>1,515,346</td>
<td>1,709,103</td>
<td>1,989,769</td>
<td>486,958</td>
<td>34%</td>
</tr>
<tr>
<td>Military Jobs</td>
<td>89,269</td>
<td>104,269</td>
<td>104,269</td>
<td>104,269</td>
<td>15,000</td>
<td>17%</td>
</tr>
<tr>
<td><strong>Total Housing Units</strong></td>
<td>1,140,654</td>
<td>1,262,488</td>
<td>1,417,520</td>
<td>1,529,090</td>
<td>388,436</td>
<td>34%</td>
</tr>
<tr>
<td>Single Family</td>
<td>692,382</td>
<td>728,566</td>
<td>755,477</td>
<td>761,699</td>
<td>69,317</td>
<td>10%</td>
</tr>
<tr>
<td>Multiple Family</td>
<td>405,023</td>
<td>493,243</td>
<td>624,419</td>
<td>732,832</td>
<td>327,809</td>
<td>81%</td>
</tr>
<tr>
<td>Mobile Homes</td>
<td>43,249</td>
<td>40,679</td>
<td>37,624</td>
<td>34,559</td>
<td>-8,690</td>
<td>-20%</td>
</tr>
<tr>
<td><strong>Households</strong></td>
<td>1,074,896</td>
<td>1,200,966</td>
<td>1,357,084</td>
<td>1,467,026</td>
<td>392,130</td>
<td>36%</td>
</tr>
<tr>
<td>Vacancy Rate</td>
<td>5.8%</td>
<td>4.9%</td>
<td>4.3%</td>
<td>4.1%</td>
<td>-1.7</td>
<td>-29%</td>
</tr>
<tr>
<td>Household Size</td>
<td>2.82</td>
<td>2.84</td>
<td>2.85</td>
<td>2.87</td>
<td>0.05</td>
<td>2%</td>
</tr>
<tr>
<td><strong>Total Acres</strong></td>
<td>2,727,197</td>
<td>2,727,197</td>
<td>2,727,197</td>
<td>2,727,197</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Residential</td>
<td>335,895</td>
<td>403,440</td>
<td>543,040</td>
<td>634,498</td>
<td>298,603</td>
<td>89%</td>
</tr>
<tr>
<td>Employment</td>
<td>88,177</td>
<td>91,286</td>
<td>95,635</td>
<td>99,905</td>
<td>11,728</td>
<td>13%</td>
</tr>
<tr>
<td>Parks and Constrained Lands</td>
<td>1,539,657</td>
<td>1,540,164</td>
<td>1,540,966</td>
<td>1,541,314</td>
<td>1,656</td>
<td>0%</td>
</tr>
<tr>
<td>Vacant Land</td>
<td>386,266</td>
<td>327,972</td>
<td>209,005</td>
<td>136,183</td>
<td>-250,083</td>
<td>-65%</td>
</tr>
</tbody>
</table>

Distribution of Projected Housing

<table>
<thead>
<tr>
<th></th>
<th>2008</th>
<th>2020</th>
<th>2035</th>
<th>2050</th>
<th>Percent of Total</th>
<th>Change 2008-2050</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Region</strong></td>
<td>1,140,654</td>
<td>1,262,488</td>
<td>1,417,520</td>
<td>1,529,090</td>
<td>100%</td>
<td>388,436</td>
</tr>
<tr>
<td>Urban Area Transit Strategy</td>
<td>899,596</td>
<td>988,248</td>
<td>1,108,012</td>
<td>1,204,621</td>
<td>79%</td>
<td>305,025</td>
</tr>
</tbody>
</table>

Distribution of Projected Jobs (civilian and military)

<table>
<thead>
<tr>
<th></th>
<th>2008</th>
<th>2020</th>
<th>2035</th>
<th>2050</th>
<th>Percent of Total</th>
<th>Change 2008-2050</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Region</strong></td>
<td>1,501,080</td>
<td>1,619,615</td>
<td>1,813,372</td>
<td>2,003,038</td>
<td>100%</td>
<td>501,958</td>
</tr>
<tr>
<td>Urban Area Transit Strategy</td>
<td>1,259,489</td>
<td>1,341,428</td>
<td>1,501,309</td>
<td>1,658,061</td>
<td>86%</td>
<td>398,572</td>
</tr>
</tbody>
</table>
Based on all of the land use inputs received from local jurisdictions, and predictions of likely development patterns in the future, the 2050 Forecast projects that 79 percent of housing units and 86 percent of jobs in the region will be located within the boundaries of the Urban Area Transit Strategy, which is the area with the highest priority for future transit investments.

Data generated on housing capacity and number of units projected by density range by parcel

SB 375 requires that the SCS identify areas within the region sufficient to house all the population in the region, including all economic segments of the population, during the RTP planning period as shown in Table 2. The SCS land use pattern has capacity for, and therefore can accommodate, more than the estimated 388,000 new homes that will be needed regionwide over the next 40 years to serve a projected growth in population of 1.3 million people.

Each jurisdiction in the region reviewed how their local plans, policies, and programs might change between 2035 and 2050. Through this effort, the region identified sufficient residential capacity to house the region’s projected population growth out to 2050. The additional capacity was derived from input from the local jurisdictions and partner agencies. Local land use inputs for the growth forecast time period included draft plan, updates, rezoning, future redevelopment (based on existing plans), mixed-use development at transit stations, and redevelopment within Smart Growth Opportunity Areas. The projections out to 2025 from the 2050 RTP form the basis of the 2010-2020 RHNA allocation process. The alternative land use inputs proposed by jurisdictions to help meet the region’s housing needs from 2035-2050 were not used in the RHNA allocation process.

Table 2: 2050 Growth Forecast Estimated Capacity By Jurisdiction & Subregion

<table>
<thead>
<tr>
<th>Dwelling Units Per Acre</th>
<th>&lt; 10</th>
<th>10-19</th>
<th>20-29</th>
<th>30+</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of San Diego</td>
<td>10,671</td>
<td>22,084</td>
<td>51,266</td>
<td>149,784</td>
<td>233,805</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>53,938</td>
<td>5,314</td>
<td>1,179</td>
<td>5,223</td>
<td>65,654</td>
</tr>
<tr>
<td>North County Coastal</td>
<td>8,655</td>
<td>3,961</td>
<td>3,654</td>
<td>4,415</td>
<td>20,685</td>
</tr>
<tr>
<td>Carlsbad</td>
<td>3,968</td>
<td>1,528</td>
<td>885</td>
<td>720</td>
<td>7,101</td>
</tr>
<tr>
<td>Del Mar</td>
<td>31</td>
<td>28</td>
<td>10</td>
<td>2</td>
<td>71</td>
</tr>
<tr>
<td>Encinitas</td>
<td>1,578</td>
<td>838</td>
<td>899</td>
<td>394</td>
<td>3,709</td>
</tr>
<tr>
<td>Oceanside</td>
<td>2,992</td>
<td>1,528</td>
<td>1,452</td>
<td>3,299</td>
<td>9,271</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>86</td>
<td>39</td>
<td>408</td>
<td>0</td>
<td>533</td>
</tr>
<tr>
<td>North County Inland</td>
<td>7,230</td>
<td>2,672</td>
<td>3,146</td>
<td>15,773</td>
<td>28,821</td>
</tr>
<tr>
<td>Escondido</td>
<td>2,543</td>
<td>783</td>
<td>493</td>
<td>3,550</td>
<td>7,369</td>
</tr>
<tr>
<td>Poway</td>
<td>1,563</td>
<td>13</td>
<td>0</td>
<td>353</td>
<td>1,929</td>
</tr>
<tr>
<td>San Marcos</td>
<td>2,292</td>
<td>944</td>
<td>2,049</td>
<td>882</td>
<td>6,167</td>
</tr>
<tr>
<td>Vista</td>
<td>832</td>
<td>932</td>
<td>604</td>
<td>10,988</td>
<td>13,356</td>
</tr>
<tr>
<td>East County</td>
<td>2,181</td>
<td>2,476</td>
<td>1,337</td>
<td>22,940</td>
<td>28,934</td>
</tr>
<tr>
<td>El Cajon</td>
<td>-772</td>
<td>1,352</td>
<td>504</td>
<td>12,721</td>
<td>13,805</td>
</tr>
<tr>
<td>La Mesa</td>
<td>231</td>
<td>220</td>
<td>159</td>
<td>7,862</td>
<td>8,472</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>135</td>
<td>176</td>
<td>190</td>
<td>1,220</td>
<td>1,721</td>
</tr>
<tr>
<td>Santee</td>
<td>2,587</td>
<td>728</td>
<td>484</td>
<td>1,137</td>
<td>4,936</td>
</tr>
<tr>
<td>South Bay</td>
<td>4,373</td>
<td>8,586</td>
<td>14,155</td>
<td>30,158</td>
<td>57,272</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>4,189</td>
<td>7,347</td>
<td>9,354</td>
<td>13,738</td>
<td>34,628</td>
</tr>
<tr>
<td>Coronado</td>
<td>12</td>
<td>6</td>
<td>148</td>
<td>122</td>
<td>288</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>5</td>
<td>745</td>
<td>378</td>
<td>1,406</td>
<td>2,534</td>
</tr>
<tr>
<td>National City</td>
<td>167</td>
<td>488</td>
<td>4,275</td>
<td>14,892</td>
<td>19,822</td>
</tr>
<tr>
<td>Region</td>
<td>87,048</td>
<td>45,093</td>
<td>74,737</td>
<td>228,293</td>
<td>435,171</td>
</tr>
</tbody>
</table>
Senate Bill 575

Senate Bill 575 adjusted the deadline for adoption of local jurisdiction housing elements in the San Diego region so that the deadline occurs eighteen (18) months following the adoption of the 2050 RTP. Housing elements in the San Diego region are required to be completed, with a finding of compliance by HCD, by April 27, 2013, 18 months following the October 28, 2011, adoption of the 2050 RTP. SB 575 also clarifies rezoning requirements under state housing element law if a jurisdiction does not have adequate sites to cover the portion of the projection period from July 1, 2010 to the deadline for housing element adoption.

RHNA Determination: Determining the region’s housing need for the fifth housing element cycle

Consultation with HCD per state law

Prior to the determination by HCD of the regional housing needs by income category for the 2013-2020 housing element cycle, HCD staff and SANDAG staff met between June and November 2010 to consult with each other to exchange information about the assumptions and methodology (population projections, vacancy rates, household formation rates) used in the determination. In addition, representatives from both HCD and the California Department of Finance (DOF) participated in the expert review meetings that took place during the development of the 2050 Forecast.

The RHNA Determination that SANDAG received from HCD for the 11-year projection period is 161,980 housing units (see Appendix B for HCD letter to SANDAG dated November 23, 2010). Table 3 shows the breakdown of the RHNA number into the four income categories. SANDAG is required to allocate the full amount of regional housing needs by income category. No reductions to regionwide numbers can be made, and every jurisdiction must be assigned very low and low income housing units in accordance with state law.

<table>
<thead>
<tr>
<th>Income Categories</th>
<th>%</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Low</td>
<td>22.5%</td>
<td>36,450</td>
</tr>
<tr>
<td>Low</td>
<td>17.1%</td>
<td>27,700</td>
</tr>
<tr>
<td>Moderate</td>
<td>18.9%</td>
<td>30,610</td>
</tr>
<tr>
<td>Above-Moderate</td>
<td>41.5%</td>
<td>67,220</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>161,980</strong></td>
</tr>
</tbody>
</table>

Table 3: Regionwide Distribution of Total RHNA Determination by Income Category

Difference between 2050 Regional Growth Forecast and RHNA Determination

The 2050 forecast projected that about 125,000 housing units will be built during the 11-year RHNA projection period. The RHNA Determination projects the need for 161,980 housing units, nearly 35,000 more units than the 2050 Forecast for the same time period.
The two projections have different purposes and were developed using different assumptions. The 2050 Forecast reflects the number of housing units that are likely to be built in the region during the 11-year RHNA period based on economic, fiscal, and other policy factors. The RHNA Determination is a projection of housing need based solely on demographic considerations such as population growth, vacancy rates, and household formation rates, and is not influenced by economic factors. The 2050 Forecast is oriented toward actual housing production, whereas the RHNA Determination is focused on planning for adequate housing capacity.

**Adequacy of housing capacity for RHNA based on 2050 Regional Growth Forecast**

Data from the 2050 Forecast demonstrate the ability of the San Diego region to accommodate the overall RHNA Determination of 161,980 housing units, and the lower income RHNA of 64,150 units (36,450 very low income units plus 27,700 low income units). The 2050 Forecast projects the construction of 169,528 housing units between January 1, 2010, and January 1, 2025 (only four years beyond the RHNA projection period).

The 2050 Forecast also contains a capacity of over 225,000 housing units (see Table 2) in the category of 30 dwelling units per acre or greater (based primarily on existing general/community plans and policies), which demonstrates that the region has more than enough sites planned to address its RHNA Determination lower income housing need of 64,150 units. Housing element law requires jurisdictions to identify adequate sites to accommodate their share of the region’s lower income housing needs and allows the use of sites with densities of at least 30 dwelling units per acre (at least 20 dwelling units per acre for Coronado, Del Mar, and Solana Beach) in their analysis.
Allocating the region’s housing need: Objectives, factors, and methodology

The RHNA Methodology and Allocation is shown in Table 4. Tables that show and compare the options considered during the development of the methodology and allocation are included in Appendix D.

State housing element law (found, in part, at Government Code Section 65584 (d)) states that the RHNA shall be consistent with the following four objectives:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low-income and very low-income households.

2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

3. Promoting an improved intraregional relationship between jobs and housing.

4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent decennial United States census.

Table 4: Regional Housing Needs Assessment for Fifth Housing Element Cycle

<table>
<thead>
<tr>
<th>11-Year RHNA (1/1/2010 - 12/31/2020)</th>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
<th>VL + Low**</th>
<th>20+ du/ac</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>11 years</strong></td>
<td>(a)</td>
<td>(b)</td>
<td>(c)</td>
<td>(d)</td>
<td>(e)</td>
<td>(f)</td>
</tr>
<tr>
<td>Carlsbad</td>
<td>4,999</td>
<td>912</td>
<td>693</td>
<td>1,062</td>
<td>2,332</td>
<td>1,605</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>12,861</td>
<td>3,209</td>
<td>2,439</td>
<td>2,257</td>
<td>4,956</td>
<td>5,648</td>
</tr>
<tr>
<td>Coronado</td>
<td>50</td>
<td>13</td>
<td>9</td>
<td>9</td>
<td>19</td>
<td>22</td>
</tr>
<tr>
<td>Del Mar</td>
<td>61</td>
<td>7</td>
<td>5</td>
<td>15</td>
<td>34</td>
<td>12</td>
</tr>
<tr>
<td>El Cajon</td>
<td>5,805</td>
<td>1,448</td>
<td>1,101</td>
<td>1,019</td>
<td>2,237</td>
<td>2,549</td>
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<td>Encinitas</td>
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<td>446</td>
<td>413</td>
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<td>La Mesa</td>
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<td>Lemon Grove</td>
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<td>National City</td>
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<td>353</td>
<td>327</td>
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<td>Oceanside</td>
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<td>Poway</td>
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<td>201</td>
<td>152</td>
<td>282</td>
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<tr>
<td>San Diego</td>
<td>88,096</td>
<td>21,977</td>
<td>16,703</td>
<td>15,462</td>
<td>33,954</td>
<td>38,680</td>
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<tr>
<td>San Marcos</td>
<td>4,183</td>
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<td>642</td>
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<td>1,608</td>
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<td>Solana Beach</td>
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<td>59</td>
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<td>150</td>
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<td>Vista</td>
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<td>343</td>
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<td>530</td>
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<td>Unincorporated</td>
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<td>5,864</td>
<td>12,878</td>
<td>3,670</td>
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<tr>
<td><strong>Region</strong></td>
<td>161,980</td>
<td>36,450</td>
<td>27,700</td>
<td>30,610</td>
<td>67,220</td>
<td>64,150</td>
</tr>
<tr>
<td><strong>11-YEAR RHNA</strong></td>
<td>36,450</td>
<td>27,700</td>
<td>30,610</td>
<td>67,220</td>
<td>64,150</td>
<td>17.1%</td>
</tr>
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</table>
The RHNA Methodology and Allocation as shown in Table 4 meets the four objectives listed above.

1. It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region. Table 2 demonstrates the mix of housing types planned for in the region by jurisdiction and subregion in the four density categories.

2. It utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources. It also demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity and ability to accommodate the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP. Table 2 demonstrates the significant housing capacity, particularly in the 20 dwelling units per acre or greater density range, for which local jurisdictions have planned in the future.

3. It promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans. Figure 1: 2050 Transit Network and Higher Density Land Uses, shows the relationship of higher density land uses (residential, employment, and mixed use) to planned high quality transit corridors in the 2050 RTP/SCS. This map also is included in Chapter 3 of the 2050 RTP/SCS.

4. It also moves toward improving the current distribution of lower-income households in the region to reduce over-concentration. Table 4 in Appendix D compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on U.S. Census data (Column (a)). Column (c) is the RHNA allocation of lower income housing by jurisdiction as a percentage of their total RHNA. It shows that the RHNA moves all but two jurisdictions -- the City of Del Mar and the unincorporated area of the county -- closer to the regional percentage of lower income households. The small size of Del Mar (population just over 4,000) and the rural nature and lack of infrastructure in the unincorporated area of the county resulted in RHNA allocations with a lower percentage of lower income housing than the regional percentage of lower income households.
Figure 1
2050 Transit Network
and Higher Density Land Uses
October 2011

High Density Land Uses
- Mixed Use: 20 or more dwelling units per acre and 30 or more jobs per acre
- Residential: 10 or more dwelling units per acre
- Employment: 30 or more jobs per acre

Transit Network
- High Quality Transit Corridors: major transit stops and/or 15-minute peak period services
- 1/2-mile from center of transit line

SANDAG
State housing element law also requires that SANDAG consider a number of factors in the development of the RHNA allocation methodology. No more than six months prior to the development of a proposed allocation methodology, SANDAG is required to survey its member agencies to request information regarding the factors listed below for use in the development of the methodology (65584.04(b)(1-4)).

As described in the section about the 2050 Forecast (pages 11-13), SANDAG obtained data (our survey) that was comparable throughout the region and readily available as inputs in the preparation of the forecast. This information was confirmed in a request SANDAG sent to the local jurisdictions in October 2010, asking for any updates that had occurred since completing the collection of land use inputs for the 2050 Forecast in December 2009. The 2050 Forecast was accepted for planning purposes in February 2010, and a technical update (used in the development of the Draft RHNA Methodology and Allocation and the Draft 2050 RTP) was accepted by the SANDAG Board in April 2011 for use in the final 2050 RTP and its SCS.

The majority of the required RHNA factors were taken into consideration during the development of the 2050 Forecast, and the Forecast serves as the foundation for the RHNA Methodology and Allocation and the 2050 Regional Transportation Plan (RTP) and its SCS land use pattern. SANDAG worked very closely in partnership with local jurisdiction staff to ensure that the 2050 Forecast reflects existing and planned land use throughout the region.

The RHNA factors as excerpted from state law and how each of the factors was addressed in the RHNA methodology is described below.

1. Each member jurisdiction’s existing and projected jobs and housing relationship.

   The 2050 Regional Growth Forecast takes each jurisdiction’s existing and projected jobs and housing into account. The 2050 Forecast considers where job growth is expected to occur and locates new housing units based on projected increases in jobs and the commuting patterns associated with the existing and planned transportation system.

2. The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

   (A) Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.
Local jurisdiction land use inputs (i.e. residential densities included in general and community plans) are based in part on the capacity or lack of capacity for sewer and water service. One of the reasons that lower density development is planned in much of the unincorporated area is its reliance on well water and septic service.

(B) The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.

The land use inputs contained in SANDAG’s 2050 Forecast for the 2050 RTP and its SCS and RHNA show a significant increase in the region’s projected multifamily housing units (84 percent of future residential growth) and land identified for redevelopment and infill development. Eighty percent of future residential growth is projected to occur on land that will be redeveloped.

(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis.

The 2050 Forecast shows land preserved or protected from urban development as constrained land in the 2050 Forecast, land which is not projected to be developed based on local land use plans.

(D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.

The land use inputs provided to SANDAG by the County of San Diego for the unincorporated area reflect the County’s recently approved updated general plan and its plans to protect agricultural land.

3. The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.

As described in this section, the distribution of household growth reflected in the 2050 Forecast guides the RHNA Methodology and Allocation and the 2050 RTP and its SCS. Housing is distributed and transportation facilities are planned in an iterative process using SANDAG’s transportation models to ensure that the relationship between the two is maximized. Figure 1 shows the relationship between higher density residential, employment, and mixed use land use and the planned high quality transit corridors in the 2050 RTP/SCS.

4. The market demand for housing.

The 2050 Forecast takes into consideration the market demand for housing for the region as a whole based on household growth, vacancy rates, and job growth, among other factors.
5. **Agreements between a county and cities in a county to direct growth toward incorporated areas of the county.**

During the development of the RHNA Methodology and Allocation and based on the regional planning undertaken by SANDAG and its member agencies during the past 15 to 20 years, the region’s decision-makers have agreed that the region’s growth should be focused in the western third of the region primarily in its incorporated cities and near transit service. This direction can be found in the Regional Comprehensive Plan and its predecessors the Regional Growth Management Strategy, Region 2020, and the Smart Growth Concept Map and 2050 RTP/SCS.

6. **The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.**

The loss of assisted housing developments for lower income households is an issue that will be addressed by each jurisdiction when preparing their housing elements. The data for these units is not readily available and varies by jurisdiction. This factor was not used in the RHNA Methodology and Allocation.

7. **High-housing cost burdens.**

Housing costs in the San Diego region are generally higher than the less urbanized areas of the state. It is expected that by planning for enough housing to meet the region’s needs for all income levels (84 percent of new residential units are projected to be multifamily) that the cost of housing in the region will moderate as these units are constructed.

8. **The housing needs of farmworkers.**

Information was provided during the development of the RHNA Methodology and Allocation regarding agricultural workers by jurisdiction. Because it is assumed that many of these workers live in the San Diego region year-round, and that their housing needs are taken into consideration in the assessment of housing needs for very low and low income households, farmworker housing needs were not directly taken into consideration in the development of the RHNA Methodology and Allocation. The County of San Diego has recently adopted an ordinance that allows farmworker housing to be built by right in the unincorporated area of the region to help address these needs.

9. **The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.**

The housing needs of college and university students were considered in the development of the 2050 Forecast. SANDAG staff worked closely with university planning staff to incorporate master plans and planned expansions of these institutions.

10. **Any other factors adopted by the council of governments.**

In the development of the RHNA Methodology and Allocation, the working groups and staff looked at several factors such as transit proximity, jobs-housing balance and income adjustments to address equity issues. The RHNA Methodology and Allocation reflects these factors as they were considered in the development of the 2050 Forecast. However, some of the RHNA options considered and shown in the tables in Appendix D took them into consideration to a greater degree than occurred in the 2050 Forecast.
Public outreach and participation

Starting in June 2010, the Regional Planning Technical Working Group (TWG) and the Regional Housing Working Group (RHWG) began meeting jointly to discuss and formulate recommendations to the Regional Planning Committee (RPC) on the RHNA Determination and the RHNA Methodology and Allocation. The TWG and RHWG met jointly in 13 public meetings: June 8, July 9, September 9, October 21, November 10, and December 9, 2010; January 13, February 10, February 24, March 10, April 14, August 11, and September 8, 2011.

In addition to the working group meetings, the Regional Planning Committee discussed the RHNA on April 2, September 10, and December 3, 2010; and on March 4, April 1, and May 6, 2011. The SANDAG Board of Directors discussed the RHNA at Policy Board meetings on July 9, 2010, and May 13, 2011. On January 28, 2011, the Board agenda included an information item regarding the RHNA Determination from HCD and on May 27, 2011 the Board accepted the Draft RHNA Methodology and Allocation for distribution and a 60-day public review period. The Board also met on September 23, 2011, to consider the comments received during the public review period. On October 28, 2011, the Board held a public hearing to adopt the final RHNA plan. All of the RPC and Board meetings were public meetings.

In June 2011, SANDAG staff held subregional public workshops and public hearings (five) and a public hearing at the Regional Planning Stakeholders Working Group (SWG) to invite the public to review and comment on the Draft RHNA Methodology and Allocation as well as the draft 2050 RTP and its SCS, and the Draft 2050 RTP EIR.
Housing production during the 2005 - 2010 housing element cycle

Housing production in the four income categories for seven years of the RHNA projection period (January 1, 2003 – December 31, 2009 – 7.5 years) for the fourth housing element cycle is shown in Table 5. The data in this table is from the Annual Housing Element Progress Reports prepared by each jurisdiction as required by housing element law, or from contact made with jurisdictions that did not prepare an annual report. The data from the annual reports is collected by SANDAG and is used in the Regional Comprehensive Plan (RCP) Performance Monitoring Report (most recent report for 2009 accepted for distribution in September 2010) and in implementing Board Policy No. 033, which is used in the evaluation of applications for competitive funding allocated by SANDAG (e.g., the Smart Growth Incentive Program (SGIP) and TransNet/Transportation Development Act (TDA) Active Transportation Program.

Table 5: Very Low and Low Income RHNA Allocations and New Units Permitted - Fourth Housing Element Cycle

<table>
<thead>
<tr>
<th>Fourth Housing Element Cycle RHNA Projection Period</th>
<th>RHNA Allocation 1/1/2003 - 6/30/2010 (7.5 years)</th>
<th>New Units Permitted 1/1/2003 - 12/31/2009 (7 years)*</th>
<th>% of RHNA for new V.L. + L Income Units</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Very Low Income RHNA</td>
<td>Low Income RHNA</td>
<td>Total Very Low + Low RHNA</td>
</tr>
<tr>
<td>Carlsbad</td>
<td>1,922</td>
<td>1,460</td>
<td>3,382</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>3,875</td>
<td>2,945</td>
<td>6,820</td>
</tr>
<tr>
<td>Coronado</td>
<td>14</td>
<td>11</td>
<td>25</td>
</tr>
<tr>
<td>Del Mar</td>
<td>6</td>
<td>4</td>
<td>10</td>
</tr>
<tr>
<td>El Cajon</td>
<td>86</td>
<td>75</td>
<td>161</td>
</tr>
<tr>
<td>Encinitas</td>
<td>392</td>
<td>299</td>
<td>691</td>
</tr>
<tr>
<td>Escondido</td>
<td>548</td>
<td>417</td>
<td>965</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>13</td>
<td>9</td>
<td>22</td>
</tr>
<tr>
<td>La Mesa</td>
<td>89</td>
<td>68</td>
<td>157</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>46</td>
<td>32</td>
<td>78</td>
</tr>
<tr>
<td>National City</td>
<td>18</td>
<td>39</td>
<td>57</td>
</tr>
<tr>
<td>Oceanside</td>
<td>1,445</td>
<td>1,098</td>
<td>2,543</td>
</tr>
<tr>
<td>Poway</td>
<td>285</td>
<td>216</td>
<td>501</td>
</tr>
<tr>
<td>San Diego</td>
<td>10,645</td>
<td>8,090</td>
<td>18,735</td>
</tr>
<tr>
<td>San Marcos</td>
<td>1,407</td>
<td>1,069</td>
<td>2,476</td>
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<tr>
<td>Santee</td>
<td>317</td>
<td>241</td>
<td>558</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>30</td>
<td>22</td>
<td>52</td>
</tr>
<tr>
<td>Vista</td>
<td>510</td>
<td>388</td>
<td>898</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>2,476</td>
<td>1,881</td>
<td>4,357</td>
</tr>
<tr>
<td>Region</td>
<td>24,124</td>
<td>18,364</td>
<td>42,488</td>
</tr>
</tbody>
</table>

*Data does not include building permits issued between 1/1/10 and 6/30/10 (last 6 months of housing element cycle). Only permits for new units are included; building permits issued for rehabilitation of existing units are not included.

Source: Local jurisdiction Annual Housing Element Progress Reports and contact with local jurisdiction staff.
Appendices

A: Excerpts from housing element law – RHNA objectives, factors, and methodology .......... Pages 27-31

B: RHNA Determination Letter from California Department of Housing and Community Development (HCD) - November 2010 ................................................................. Pages 33-36

C: Key dates for RHNA for fifth housing element cycle ......................................................... Page 37

D: RHNA Methodology and Allocation Option Tables and Descriptions
(From May 27, 2011 SANDAG Board of Directors report) ....................................................... Pages 39-54

E: Board Policy No. 033
On July 22, 2011, the Board of Directors appointed an ad hoc subcommittee of Board members to review and make recommendations on Board Policy No. 033. Appendix E will be added to the RHNA Plan following the Board action on Policy No. 33. .................................................................................. Pages 55-___
Excerpts from Housing Element Law  
(Government Code Sections 65584 and 65584.04)  

Regional Housing Needs Assessment (RHNA)  
Objectives, Methodology, and Factors

65584.  

(a) (1) For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.

(2) While it is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, it is recognized, however, that future housing production may not equal the regional housing need established for planning purposes.

(b) The department, in consultation with each council of governments, shall determine each region’s existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04 and 65584.05 with the advice of the department.

(c) Notwithstanding any other provision of law, the due dates for the determinations of the department or for the councils of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding housing element revision deadline pursuant to Section 65588 by not more than 60 days.

(d) The regional housing needs allocation plan shall be consistent with all of the following objectives:

(1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low and very low income households.
(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

(3) Promoting an improved intraregional relationship between jobs and housing.

(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent decennial United States census.

(e) For purposes of this section, "household income levels" are as determined by the department as of the most recent decennial census pursuant to the following code sections:

(1) Very low incomes as defined by Section 50105 of the Health and Safety Code.

(2) Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.

(3) Moderate incomes, as defined by Section 50093 of the Health and Safety Code.

(4) Above moderate incomes are those exceeding the moderate income level of Section 50093 of the Health and Safety Code.

(f) Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, or 65584.07 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

65584.04. (a) At least two years prior to a scheduled revision required by Section 65588, each council of governments, or delegate subregion as applicable, shall develop a proposed methodology for distributing the existing and projected regional housing need to cities, counties, and cities and counties within the region or within the subregion, where applicable pursuant to this section. The methodology shall be consistent with the objectives listed in subdivision (d) of Section 65584.

(b) (1) No more than six months prior to the development of a proposed methodology for distributing the existing and projected housing need, each council of governments shall survey each of its member jurisdictions to request, at a minimum, information regarding the factors listed in subdivision (d) that will allow the development of a methodology based upon the factors established in subdivision (d).

(2) The council of governments shall seek to obtain the information in a manner and format that is comparable throughout the region and utilize readily available data to the extent possible.

(3) The information provided by a local government pursuant to this section shall be used, to the extent possible, by the council of governments, or delegate subregion as applicable, as source information for the methodology developed pursuant to this
The survey shall state that none of the information received may be used as a basis for reducing the total housing need established for the region pursuant to Section 65584.01.

(4) If the council of governments fails to conduct a survey pursuant to this subdivision, a city, county, or city and county may submit information related to the items listed in subdivision (d) prior to the public comment period provided for in subdivision (c).

(c) Public participation and access shall be required in the development of the methodology and in the process of drafting and adoption of the allocation of the regional housing needs. Participation by organizations other than local jurisdictions and councils of governments shall be solicited in a diligent effort to achieve public participation of all economic segments of the community. The proposed methodology, along with any relevant underlying data and assumptions, and an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, and how each of the factors listed in subdivision (d) is incorporated into the methodology, shall be distributed to all cities, counties, any subregions, and members of the public who have made a written request for the proposed methodology. The council of governments, or delegate subregion, as applicable, shall conduct at least one public hearing to receive oral and written comments on the proposed methodology.

(d) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:

1. Each member jurisdiction’s existing and projected jobs and housing relationship.

2. The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

   A) Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.

   B) The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water
Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding.

(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis.

(D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.

(3) The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.

(4) The market demand for housing.

(5) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county.

(6) The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.

(7) High-housing cost burdens.

(8) The housing needs of farmworkers.

(9) The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.

(10) Any other factors adopted by the council of governments.

(e) The council of governments, or delegate subregion, as applicable, shall explain in writing how each of the factors described in subdivision (d) was incorporated into the methodology and how the methodology is consistent with subdivision (d) of Section 65584. The methodology may include numerical weighting.

(f) Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county shall not be a justification for a determination or a reduction in the share of a city or county of the regional housing need.

(g) In addition to the factors identified pursuant to subdivision (d), the council of governments, or delegate subregion, as applicable, shall identify any existing local, regional, or state incentives, such as a priority for funding or other incentives available to those local governments that are willing to accept a higher share than proposed in the draft allocation to those local governments by the council of governments or delegate subregion pursuant to Section 65584.05.

Land protected from urban development

Prime agricultural land in unincorporated area

Distribution of household growth in RTP

SANDAG shall explain how factors were used in RHNA

Building permit limits shall not be justification for RHNA allocations

SANDAG shall identify incentives for acceptance of higher RHNA share

60-day public comment period
(h) Following the conclusion of the 60-day public comment period described in subdivision (c) on the proposed allocation methodology, and after making any revisions deemed appropriate by the council of governments, or delegate subregion, as applicable, as a result of comments received during the public comment period, each council of governments, or delegate subregion, as applicable, shall adopt a final regional, or subregional, housing need allocation methodology and provide notice of the adoption of the methodology to the jurisdictions within the region, or delegate subregion as applicable, and to the department.

(i) (1) It is the intent of the Legislature that housing planning be coordinated and integrated with the regional transportation plan. To achieve this goal, the allocation plan shall allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.

(2) The final allocation plan shall ensure that the total regional housing need, by income category, as determined under Section 65584, is maintained, and that each jurisdiction in the region receive an allocation of units for low and very low-income households.

(3) The resolution approving the final housing need allocation plan shall demonstrate that the plan is consistent with the sustainable communities strategy in the regional transportation plan.
November 23, 2010

Mr. Gary L. Gallegos  
Executive Director  
San Diego Association of Governments  
401 B Street, Suite 800  
San Diego, CA 92101-4231  

Dear Mr. Gallegos:

**RE: Regional Housing Need Determination**

This letter provides the San Diego Association of Governments (SANDAG) its Regional Housing Need Determination. Pursuant to State housing element law (Government Code Section 65584, et seq.), the Department of Housing and Community Development (Department) is required to provide the determination of SANDAG’s existing and projected housing need.

As you know, recent legislation amended State laws impacting regional housing and transportation planning. SB 375 (Chapter 728, Statutes of 2008) strengthened coordination of housing and transportation planning and requires Metropolitan Planning Organizations (MPOs) to prepare a sustainable communities strategy to achieve greenhouse gas emission reductions. Among other things, SB 575 (Chapter 354, Statutes of 2009) included amendments establishing the due date for San Diego local governments to update the fifth revision of their housing elements. In assessing SANDAG’s regional housing need, the Department considered the importance of these legislative amendments in connection with the critical role housing plays in creating sustainable communities and providing jobs.

In determining SANDAG’s regional housing need, the Department and SANDAG staff completed an extensive consultation process. On June 21, 2010, the Department met with the following SANDAG staff: Mr. Muggs Stoll, Ms. Coleen Clementson, Ms. Susan Baldwin, and Ms. Beth Jarosz. The Department, along with Ms. Baldwin and Ms. Jarosz, also consulted with Ms. Mary Heim, State Department of Finance (DOF) Deputy Director of the Demographic Research Unit. Consultations between June and November included data generation and review by SANDAG, DOF, and the Department.

Attachment 1 displays the minimum regional housing need allocation (RHNA) of 161,980 total units among four income categories for SANDAG to distribute among its local governments. Attachment 2 explains the methodology applied pursuant to Government Code Section 65584.01. As you know, SANDAG is responsible for adopting a methodology and RHNA Plan for the projection period beginning January 2010 and
ending December 2020. Within 30 days from adopting the Plan, SANDAG must submit
the Plan to the Department for approval. Local governments are required to update
their Housing Element for the planning period beginning January 2013 and ending
December 2020 to accommodate the share of RHNA for each income category.

Pursuant to Government Code Section 65584, the methodology to prepare SANDAG’s
RHNA plan must be consistent with the following objectives:

(1) increasing the housing supply and mix of housing types, tenure, and affordability;
(2) promoting infill development and socioeconomic equity, protecting environmental and
    agricultural resources, and encouraging efficient development patterns;
(3) promoting an improved intraregional relationship between jobs and housing;
(4) balancing the distribution of households by income category.

The Department commends SANDAG for its leadership and efforts in fulfilling its
important role in advancing the State’s housing, transportation, and environmental
goals. SANDAG is also recognized for successfully undertaking the challenging task of
being the first MPO in the State to begin implementing SB 375 including efforts to
develop its RHNA and sustainable communities strategy. The Department especially
thanks Ms. Baldwin and Ms. Jarosz for their significant efforts and assistance. The
Department looks forward to its continued partnership with SANDAG and its member
jurisdictions and assisting SANDAG in its planning efforts to accommodate the region’s
share of housing need.

If the Department can provide any additional assistance, or if you, or your staff, have any
questions, please contact Glen Campora, Assistant Deputy Director, at (916) 445-4728.

Sincerely,

Cathy E. Creswell
Deputy Director

Enclosures
### ATTACHMENT 1

#### HCD REGIONAL HOUSING NEED DETERMINATION

**SANDAG GOVERNMENTS: JANUARY 2010 through DECEMBER 2020**

<table>
<thead>
<tr>
<th>Income Category</th>
<th>Percent</th>
<th>Housing Unit Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very-Low</td>
<td>22.5%</td>
<td>36,450</td>
</tr>
<tr>
<td>Low</td>
<td>17.1%</td>
<td>27,700</td>
</tr>
<tr>
<td>Moderate</td>
<td>18.9%</td>
<td>30,610</td>
</tr>
<tr>
<td>Above-Moderate</td>
<td>41.5%</td>
<td>67,220</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>100.0%</strong></td>
<td><strong>161,980</strong></td>
</tr>
</tbody>
</table>

**Notes:**

**Housing Need Determination:**
Refer to Attachment 2 for a description and explanation of methodology.

The Department and SANDAG staff acknowledge important differences between the "projection" methodology specified in statute to determine housing need versus the "forecasting" methodology SANDAG used for its 2050 Growth Forecast. The planning objective of the RHNA is to accommodate housing "capacity" for projected household growth. However, among the objectives of SANDAG's Growth Forecast is to estimate housing "production" based on policy considerations (including potential constraints) and assumptions regarding variables such as housing prices, resource limitations and market trends, etc. Differences in estimates of the number of housing units can occur from applying different methodologies.

**Income Categories:**
Each category is defined by California Health and Safety Code (Section 50093, et seq.). Percent is derived based on Census reported household income brackets and county median income. Housing unit need is derived from multiplying income category percent against total.
**ATTACHMENT 2**

**HCD REGIONAL HOUSING NEED DETERMINATION: SANDAG January 2010-December 2020**

**Methodology**

<table>
<thead>
<tr>
<th>Projected Population, Households, and New Housing Unit Need: December 31, 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. <strong>Population:</strong> December 31, 2020 (SANDAG's Estimate):</td>
</tr>
<tr>
<td>2. <strong>Less: Group Quarter Population (SANDAG’s Estimate):</strong></td>
</tr>
<tr>
<td>3. <strong>Household (HH) Population:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. <strong>Projected Households (HHS):</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Age Groups (DOF):</strong></td>
</tr>
<tr>
<td>Under 15 years</td>
</tr>
<tr>
<td>15 - 24 years</td>
</tr>
<tr>
<td>25 - 34 years</td>
</tr>
<tr>
<td>35 - 44 years</td>
</tr>
<tr>
<td>45 - 54 years</td>
</tr>
<tr>
<td>55 - 64 years</td>
</tr>
<tr>
<td>65 plus years</td>
</tr>
</tbody>
</table>

**Projected Households (HHs):** 1,258,980

| 5. **Less: Existing Households at Beginning of Projection Period (January 1, 2010):** | -1,103,320 |

| 6. **Household (HH) Growth: 11-Year Projection Period (New Housing Unit Need):** | 155,660 |

<table>
<thead>
<tr>
<th>7. <strong>Vacancy Allowance:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Tenure Percentage:</strong></td>
</tr>
<tr>
<td>New Unit Need</td>
</tr>
<tr>
<td>Vacancy Rate</td>
</tr>
<tr>
<td>Vacancy Allowance</td>
</tr>
<tr>
<td>1,726</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>8. <strong>Replacement Allowance:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>0.70%</td>
</tr>
</tbody>
</table>

**REGIONAL HOUSING NEED DETERMINATION (New Housing Unit Need):** 161,980

**Explanation and Data Sources**

1. **Population:** Population reflects SANDAG's January 1, 2021 projection from its 2050 Growth Forecast. Per Government Code 65584.01(b), HCD accepted SANDAG's projection upon determining it was within 3 percent of the population projected by State Department of Finance (DOF) for the same period.

2. **Group Quarter Population:** Figure is SANDAG's estimate of persons residing in group home/institution/military/dormitory quarters. As this population doesn't constitute a "household" population generating demand for a housing unit, the group quarter population is subtracted from total population to derive household population or the number of persons generating a housing need for a owner or renter unit.

3. **Household (HH) Population:** The population projected to reside in housing units after subtracting the group quarter population from total projected population.

4. **Projected Households (HHS):** Projected HHs are derived by applying (to HH population) estimated HH formation rates determined by DOF among displayed age groups. HH formation or headship rates reflect the propensity of different population groups (by age, ethnicity, etc.) to form new households.

5. **Existing Households:** This figure reflects DOF's estimate of "occupied" units at start of period of January 2010 (per DOF E-5 report released May 2010 by the Demographic Research Unit). Existing HHs (units) are subtracted from projected HHs at end of period (December 31, 2020) to derive household growth.

6. **Household (HH) Growth:** This figure reflects projected HH growth and need for new units.

7. **Vacancy Allowance:** An adjustment (unit increase) is made to facilitate availability among owner and renter units. Owner/Renter % is based on Census data. A smaller rate is applied to owner units due to less frequent movement. Information from different authoritative sources support an acceptable range of 1-4% for owner units and 4-8% for renter units depending on market conditions. The 2% owner rate was reduced from the 3% rate used in 2005. No change was made to the 5% renter rate.

8. **Replacement Allowance:** Rate (0.7%) reflects housing losses localities annually reported to DOF each January for years 2000-2010.
### Key Dates for Regional Housing Needs Assessment (RHNA)  
**Fifth Housing Element Update**

<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 2010</td>
<td>SANDAG Board of Directors accepts 2050 Regional Growth Forecast for planning purposes for use in preparing the Draft 2050 Regional Transportation Plan (2050 RTP), its Sustainable Communities Strategy (SCS), and RHNA</td>
</tr>
<tr>
<td>January 1, 2010</td>
<td>Eleven-year RHNA projection period for fifth housing element cycle starts (January 1, 2010 – December 31, 2020)</td>
</tr>
<tr>
<td>June 1, 2010</td>
<td>Joint meeting between the Regional Planning Technical Working Group (TWG) and Regional Housing Working Group (RHWG) to kick off RHNA methodology discussion: RHNA background, schedule, and principles</td>
</tr>
<tr>
<td>June 2010 - April 2011</td>
<td>TWG/RHWG develop RHNA allocation methodology</td>
</tr>
<tr>
<td>July 9, 2010</td>
<td>SANDAG Board holds policy meeting to discuss RHNA</td>
</tr>
<tr>
<td>July 23, 2010</td>
<td>SANDAG provides California Department of Housing and Community Development (HCD) and Caltrans date of expected adoption of 2050 RTP in writing as required by Senate Bill 575 (Steinberg, 2009)</td>
</tr>
<tr>
<td>November 2010</td>
<td>HCD provides SANDAG with regional housing needs determination for eleven-year RHNA projection period: January 1, 2010 – December 31, 2020</td>
</tr>
<tr>
<td>April 2011</td>
<td>RHNA allocation options forwarded by TWG and RHWG to Regional Planning Committee</td>
</tr>
<tr>
<td>May 2011</td>
<td>Regional Planning Committee makes recommendation on Draft RHNA methodology and allocation to SANDAG Board; Board accepts Draft RHNA methodology and allocation for 60-day public review</td>
</tr>
<tr>
<td>June 2011</td>
<td>Public workshops held in conjunction with 2050 RTP and its SCS</td>
</tr>
<tr>
<td>July/September 2011</td>
<td>RHNA Plan to TWG/RHWG, and Board of Directors</td>
</tr>
<tr>
<td>October 28, 2011</td>
<td>Final 2050 RTP, its SCS, and RHNA adopted by SANDAG Board</td>
</tr>
<tr>
<td>April 27, 2013</td>
<td>Due date for eight-year January 1, 2013 – December 31, 2020, housing elements (due within 18 months after RTP is adopted)*</td>
</tr>
</tbody>
</table>

*Housing elements are due every four years for:

1. Jurisdictions that did not adopt their fourth housing element revisions by January 1, 2009, and did not adopt the fourth revision by March 31, 2010, and complete any rezoning contained in the housing element program by June 30, 2010; and
2. Jurisdictions that do not adopt their housing element within 120 days from next housing element due date.
RHNA Methodology and Allocation Option Tables and Descriptions
May 27, 2011

Attached are background tables and RHNA Methodology and Allocation tables that have been developed during the RHNA process for the Regional Planning Technical Working Group (TWG), Regional Housing Working Group (RHWG), Regional Planning Committee, and SANDAG Board of Directors.

Tables 1a, 1b, 1c, 2b, 2c, 3a, 3c, 3d, 4, and 5 are included. Tables 2a and 3b were dropped from consideration at the March 10, 2011, joint meeting of the TWG and RHWG.

RHNA Option Tables

During the RHNA process, the two working groups (TWG and the RHWG) meeting jointly reviewed background information from the 2050 Regional Growth Forecast, and developed a number of RHNA methodology and allocation options, which considered the RHNA factors in state housing element law, meet the RHNA objectives in state law, and are consistent with the Sustainable Communities Strategy (SCS) of the Draft 2050 Regional Transportation Plan (2050 RTP).

Brief descriptions of the background information contained in Tables 1a, 1b, 4, and 5, and the remaining RHNA options shown in Tables 1c, 2b, 2c, 3a, 3c, and 3d are provided below.

To assist in understanding the RHNA allocation options, some additional information is provided below.

- The 2050 Regional Growth Forecast is the foundation for the background data and RHNA allocation options in the attached tables. Each jurisdiction’s 11-year RHNA number in Table 1a, Column (e) is based on the 2050 Regional Growth Forecast.
- The numbers shown in the RHNA allocation options tables have been revised based on the technical update of the 2050 Regional Growth Forecast, and further revisions may occur based on any future changes to the transit network in the Final 2050 RTP.
- The lower income housing capacities shown in the tables are based on densities of 20 dwelling units per acre (du/ac) or greater. In state housing element law, the density associated with the identification of adequate lower income housing sites is 30 cu/ac or greater for all jurisdictions in the San Diego region, except Coronado and Del Mar, which can use sites zoned for 20 du/ac or greater to identify lower income sites. State housing element law allows a jurisdiction to identify sites at lower densities if jurisdictions can demonstrate that affordable housing has been built at those densities. In addition to multifamily zoned land, jurisdictions can identify sites for farmworker housing, second units, and/or existing units that jurisdictions identify and commit funding for acquiring and rehabilitating units.
- The Very Low and Low Income (also known as lower income) RHNA numbers have been grouped together in the RHNA allocation option tables and are shown as VL+L in the table headings.
- The RHNA options in Tables 1c, 2c, 3a, 3c, and 3d exceed the existing plan lower income capacities of several jurisdictions (numbers shown in bold). (Only the RHNA option in Table 2b does not exceed the existing lower income capacities for each of the local jurisdictions.) The
TWG and RHWG discussed the potential of using incentives, such as the TransNet Smart Growth Incentive Program and Active Transportation Program grant funds and Board Policy No. 033 in conjunction with the methodology ultimately selected. The two groups propose to continue discussing the potential use of incentives at upcoming joint meetings and report back to the Regional Planning Committee and the Board of Directors at future meetings.

Table 1a. Distribution of Total RHNA-Determination, Jobs/Housing Data, and Percent of Very Low and Low Income Households by Jurisdiction

Table 1a addresses anticipated housing unit growth by jurisdiction over the 11-year RHNA period. To determine the 11-year RHNA projected housing unit growth, the table shows actual housing unit counts as of January 1, 2010, and housing units projected as of January 1, 2020, and January 1, 2025, based on the 2050 Regional Growth Forecast. The projected housing unit growth over the 15-year period (169,528) is then prorated to the 11-year RHNA period by jurisdiction to meet the RHNA-Determination from the California Department of Housing and Community Development (HCD) of 161,980 housing units. Existing and projected civilian jobs in 2008 and 2020 are shown and used to calculate jobs/housing ratios for those two years.

The table also includes each jurisdiction’s number of agricultural jobs, and percentage and share of jobs in lower-wage industries (including retail, wholesale, leisure, and hospitality jobs). The percentages of Very Low and Low Income (VL+L) households by jurisdiction from the 2000 Census also are shown.

Table 1b. 2050 Estimated Housing Capacity

Table 1b shows the estimated housing capacity by jurisdiction in 2050 at <10, 10-19, 20-29, 30+, and 20+ dwelling units per acre (du/acre) based on the 2050 Regional Growth Forecast.

Table 1c. Regional Share Option

Table 1c allocates the 11-year RHNA projected housing unit number by jurisdiction based on the regionwide income distribution percentages assigned by HCD. The differences between the Very Low and Low Income Allocation and each jurisdiction’s Existing Plan and 2050 20+ du/ac Capacity are shown in Columns (g) and (j).

This table serves as the starting point for all the remaining RHNA options (Tables 2b, 2c, 3a, 3c, and 3d).

Table 2b. Lower Income Capacity Option – SANDAG Staff Recommendation: Forwarded to Board of Directors by Regional Planning Committee on May 6, 2011

Table 2b takes the 11-year RHNA projected housing numbers by jurisdiction and distributes them into the four income groups based on HCD regionwide income percentages (22.5% Very Low, 17.1% Low, 18.9% Moderate, and 41.5% Above Moderate). The Existing Plan 20+ du/ac capacity reflected in each jurisdiction’s general/community plans was not exceeded to calculate the Very Low and Low Income RHNA numbers in this option. A total of 5,736 units from the jurisdictions in which existing plan capacity was exceeded in Table 1c (Carlsbad by 375 units, Del Mar by 12 units, Poway by 143 units, and the County Unincorporated Area by 5,206 units) were redistributed proportionately to jurisdictions with remaining capacity by applying an adjustment factor of 1.10871.
Table 2c. Lower Income Capacity Option with Jobs/Housing Balance Adjustment – **Forwarded to Regional Planning Committee by Working Groups on April 14, 2011**

Table 2c adjusts the Very Low and Low Income housing unit allocations from the December 9, 2010, RHNA Allocation Proposal (Table 2a) (which was not forwarded to the Regional Planning Committee) to address the issue of jobs/housing balance using variance calculations from the regional jobs/housing ratio and a controlled adjustment. The differences between the Very Low and Low Income Allocation and each jurisdiction’s Existing Plan and 2050 20+ du/ac Capacity are shown in Columns (i) and (l).

Table 3a. Regional Share Option with Jobs/Housing Balance and Income Adjustment

Table 3a demonstrates a RHNA allocation option that allocates the Very Low and Low Income units using Table 1c, and applying a jobs/housing balance adjustment and income adjustment. The percentage and numerical differences between the Very Low and Low Income Allocation and each jurisdiction’s Existing Plan capacity are shown in Columns (l) and (m), and the numerical difference between the Very Low and Low Income Allocation and each jurisdiction’s 2050 20+ du/ac capacity is shown in Column (p).

Table 3c. Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment – **Forwarded to Regional Planning Committee by Working Groups on April 14, 2011**

Table 3c demonstrates a RHNA allocation concept that allocates the Very Low and Low Income units using Table 1c and applying three adjustments: jobs/housing balance, income, and transit (based on the housing capacity within a quarter-mile radius of the transit stations and bus stops shown on the attached 2020 peak-period high-frequency transit service map). The percentage and numerical difference between the Very Low and Low Income Allocation and each jurisdiction’s Existing Plan 20+ du/ac capacity are shown in Columns (p) and (q), and the numerical difference between the Very Low and Low Income Allocation and each jurisdiction’s 2050 20+ du/ac capacity is shown in Column (t).

Table 3d. Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Area Capacity Adjustment – **Forwarded to Regional Planning Committee by Working Groups on April 14, 2011; Forwarded to Board of Directors by Regional Planning Committee on May 6, 2011**

Table 3d builds on Table 3c by adding a capacity adjustment that limits the Very Low and Low Income housing capacity (20+ du/ac) of the Unincorporated Area to 3,670 units and redistributes units proportionately to all the cities by applying an adjustment factor of 1.09417.

Table 4. Households by Income and Very Low and Low Income Allocation Percentages for RHNA Concepts

Table 4 shows the percentages of Very Low and Low Income Households based on the 2000 Census and the six RHNA allocation options forwarded to the Regional Planning Committee. This table shows how each RHNA allocation option addresses the RHNA income overconcentration objective in housing element law by showing the relationship between the RHNA Very Low and Low Income allocations and the percentage of existing Very Low and Low Income households in each jurisdiction. For example, Option 2b reflects an increase of 5 percentage points in Very Low and Low Income housing for Carlsbad, and a decrease of 17 percentage points in Very Low and Low
Income housing for National City in relation to the percentage of existing Very Low and Low Income households in these jurisdictions.

*Table 5 Very Low and Low Income Allocation Numbers for RHNA Options*

Table 5 compares the lower income RHNA allocations for the six RHNA options as well as the estimated existing lower income capacities for each of the local jurisdictions.
<table>
<thead>
<tr>
<th>Options</th>
<th>Characteristics</th>
<th>Notes</th>
</tr>
</thead>
</table>
| **Option 1c: Regional Share Option**                                    | • Applies income distribution percentages assigned by HCD  
• Based on 2050 Regional Growth Forecast                                                                                                                                                                         | Exceeds lower income general plan capacities of four jurisdictions – Carlsbad, Del Mar, Poway, and Unincorporated Area                                                                                   |
| **Option 2b: Lower Income Capacity Option**                            | • Applies income distribution percentages assigned by HCD, but does not exceed 20 du/ac capacity of any local jurisdiction  
• Redistributes lower income RHNA from four jurisdictions where capacity is exceeded to jurisdictions with remaining capacity                                                                                   | Only option where no lower income general plan capacities are exceeded  
Carlsbad, Del Mar, Poway, and Unincorporated Area lower income general plan capacities are not exceeded                                                                                          |
| **Option 2c: Lower Income Capacity Option with Jobs/Housing Balance Adjustment** | • Applies jobs/housing balance adjustment to December 9, 2010, RHNA Proposal (Option 2a)  
• Limits Unincorporated Area lower income RHNA to 3,670 units                                                                                                                                    | Exceeds lower income general plan capacities of three jurisdictions (by smallest amounts) – Carlsbad, Del Mar, and Poway  
Unincorporated Area lower income general plan capacity not exceeded                                                                                                                            |
| **Option 3a: Regional Share Option with Jobs/Housing Balance and Income Adjustments** | • Starts with Option 1c and applies two adjustments: jobs/housing balance and income                                                                                                                                               | Exceeds lower income general plan capacities of four jurisdictions – Carlsbad, Del Mar, Poway, and Unincorporated Area                                                                                |
| **Option 3c: Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustments** | • Starts with Option 1c and applies three adjustments: jobs/housing balance, income, and transit accessibility within quarter mile radius of high-frequency transit stops in 2020                                                                                      | Exceeds lower income general plan capacities of four jurisdictions – Carlsbad, Del Mar, Poway, and Unincorporated Area                                                                               |
| **Option 3d Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Area Capacity Adjustment** | • Starts with Option 3c and adds an adjustment that limits the Unincorporated Area lower income RHNA to 3,670 units                                                                                                               | Exceeds lower income general plan capacities of three jurisdictions – Carlsbad, Del Mar, and Poway  
Unincorporated Area lower income general plan capacity not exceeded                                                                                                                           |
### Table 1a. Distribution of Total RHNA-Determination, Jobs/Housing Data, and Percent of Very Low & Low Income Households by Jurisdiction

#### 2050 Regional Growth Forecast (Technical Update)

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Existing Housing Units 2010-25 Growth</th>
<th>Pro-rated to 11 years</th>
<th>Jobs / Housing Ratio 2008</th>
<th>Projected Jobs 2020</th>
<th>Jobs / Housing Ratio 2020</th>
<th>Sales &amp; Tourism Jobs %</th>
<th>Number of Sales &amp; Tourism Jobs</th>
<th>Share of Regional Sales and Tourism Jobs</th>
<th>Percent VL+ L Households (2000 Census)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carlsbad</td>
<td>43,844</td>
<td>48,104</td>
<td>1/1/2010</td>
<td>2010-25</td>
<td>5,232</td>
<td>4,999</td>
<td>1.4599</td>
<td>18,621</td>
<td>30%</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>78,244</td>
<td>88,186</td>
<td>91,704</td>
<td>13,460</td>
<td>12,663</td>
<td>11,999</td>
<td>1.4799</td>
<td>20,623</td>
<td>36%</td>
</tr>
<tr>
<td>Coronado</td>
<td>9,562</td>
<td>9,580</td>
<td>9,614</td>
<td>52</td>
<td>52</td>
<td>61,999</td>
<td>1.4254</td>
<td>70,228</td>
<td>30%</td>
</tr>
<tr>
<td>Del Mar</td>
<td>2,542</td>
<td>2,587</td>
<td>2,606</td>
<td>64</td>
<td>61</td>
<td>4,065</td>
<td>1.6036</td>
<td>4,149</td>
<td>56%</td>
</tr>
<tr>
<td>El Cajon</td>
<td>35,644</td>
<td>39,187</td>
<td>41,719</td>
<td>6,075</td>
<td>5,805</td>
<td>41,686</td>
<td>1.1346</td>
<td>44,463</td>
<td>26%</td>
</tr>
<tr>
<td>Encinitas</td>
<td>24,777</td>
<td>26,331</td>
<td>27,339</td>
<td>2,462</td>
<td>2,353</td>
<td>26,955</td>
<td>1.0879</td>
<td>28,711</td>
<td>22%</td>
</tr>
<tr>
<td>Escondido</td>
<td>47,682</td>
<td>50,370</td>
<td>52,061</td>
<td>4,369</td>
<td>4,175</td>
<td>61,143</td>
<td>1.2902</td>
<td>66,803</td>
<td>24%</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>9,860</td>
<td>9,866</td>
<td>10,126</td>
<td>266</td>
<td>254</td>
<td>7,187</td>
<td>0.7296</td>
<td>7,479</td>
<td>9%</td>
</tr>
<tr>
<td>La Mesa</td>
<td>25,614</td>
<td>26,785</td>
<td>27,416</td>
<td>1,802</td>
<td>1,722</td>
<td>27,579</td>
<td>1.0123</td>
<td>28,813</td>
<td>27%</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>8,868</td>
<td>9,076</td>
<td>9,191</td>
<td>323</td>
<td>309</td>
<td>7,640</td>
<td>0.8662</td>
<td>7,890</td>
<td>27%</td>
</tr>
<tr>
<td>National City</td>
<td>15,787</td>
<td>17,052</td>
<td>17,737</td>
<td>1,950</td>
<td>1,863</td>
<td>21,060</td>
<td>1.3352</td>
<td>21,994</td>
<td>39%</td>
</tr>
<tr>
<td>Oceanside</td>
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<td>69,630</td>
<td>71,257</td>
<td>6,499</td>
<td>6,210</td>
<td>43,977</td>
<td>0.6623</td>
<td>48,464</td>
<td>33%</td>
</tr>
<tr>
<td>Poway</td>
<td>16,364</td>
<td>17,233</td>
<td>17,765</td>
<td>1,311</td>
<td>1,253</td>
<td>31,176</td>
<td>1.9111</td>
<td>32,386</td>
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<td>577,416</td>
<td>604,016</td>
<td>92,196</td>
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<td>790,252</td>
<td>1.5543</td>
<td>838,909</td>
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<td>30,065</td>
<td>32,122</td>
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<td>4,183</td>
<td>37,383</td>
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<td>3,220</td>
<td>15,304</td>
<td>0.7833</td>
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<td>6,646</td>
<td>6,877</td>
<td>346</td>
<td>340</td>
<td>7,533</td>
<td>1.1573</td>
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<td>31,602</td>
<td>32,154</td>
<td>1,438</td>
<td>1,374</td>
<td>41,315</td>
<td>1.3480</td>
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<td>192,597</td>
<td>23,455</td>
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<td>107,131</td>
<td>0.6420</td>
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<td><strong>1,262,488</strong></td>
<td><strong>1,318,944</strong></td>
<td><strong>169,518</strong></td>
<td><strong>161,980</strong></td>
<td><strong>1,411,811</strong></td>
<td><strong>1.2377</strong></td>
<td><strong>1,515,346</strong></td>
<td><strong>25%</strong></td>
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</table>

#### Regionwide Distribution of Total RHNA Target by Income Category

<table>
<thead>
<tr>
<th>Income Category</th>
<th>% units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Low</td>
<td>22.9%</td>
</tr>
<tr>
<td>Low</td>
<td>17.1%</td>
</tr>
<tr>
<td>Moderate</td>
<td>18.9%</td>
</tr>
<tr>
<td>Above Moderate</td>
<td>41.1%</td>
</tr>
</tbody>
</table>

#### Notes:

(a) Actual housing unit counts (January 1, 2010)
(b) Projected housing units January 1, 2020 from 2050 Regional Growth Forecast (Technical Update)
(c) Projected housing units January 1, 2025 from 2050 Regional Growth Forecast (Technical Update)
(d) Projected 15-year housing forecast (1/1/2010-1/1/2025)
(e) Forecast pro-rated to 11-year RHNA Determination
(f) Jobs / housing ratio in 2008
(g) Projected jobs/housing ratio in 2020
(h) Sales & tourism jobs %
(i) Number of jobs in agriculture and mining sector in 2008, rounded to nearest 10. (Values not shown if fewer than 50 jobs.)
(j) Percent of civilian jobs in lower-wage industries (retail, wholesale, leisure & hospitality) by jurisdiction.
(k) Projected number of sales & tourism jobs
(l) Percent of Very Low and Low Income Households in each jurisdiction from 2000 Census
### Table 1b. 2050 Estimated Housing Capacity* by Jurisdiction

2050 Regional Growth Forecast (Technical Update)

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>&lt; 10 du/ac</th>
<th>10-19 du/ac</th>
<th>20-29 du/ac</th>
<th>30+ du/ac</th>
<th>TOTAL</th>
<th>20+ du/ac Capacity</th>
</tr>
</thead>
<tbody>
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<td>Carlsbad</td>
<td>3,968</td>
<td>1,528</td>
<td>885</td>
<td>720</td>
<td>7,101</td>
<td>1,605</td>
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<tr>
<td>Chula Vista</td>
<td>4,189</td>
<td>7,347</td>
<td>9,354</td>
<td>13,738</td>
<td>34,628</td>
<td>23,092</td>
</tr>
<tr>
<td>Coronado</td>
<td>12</td>
<td>6</td>
<td>148</td>
<td>122</td>
<td>288</td>
<td>270</td>
</tr>
<tr>
<td>Del Mar</td>
<td>31</td>
<td>28</td>
<td>10</td>
<td>2</td>
<td>71</td>
<td>12</td>
</tr>
<tr>
<td>El Cajon</td>
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<td>1,352</td>
<td>504</td>
<td>12,721</td>
<td>13,805</td>
<td>13,225</td>
</tr>
<tr>
<td>Encinitas</td>
<td>1,578</td>
<td>838</td>
<td>899</td>
<td>394</td>
<td>3,709</td>
<td>1,293</td>
</tr>
<tr>
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<td>2,543</td>
<td>783</td>
<td>493</td>
<td>3,550</td>
<td>7,369</td>
<td>4,043</td>
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<tr>
<td>Imperial Beach</td>
<td>5</td>
<td>745</td>
<td>378</td>
<td>1,406</td>
<td>2,534</td>
<td>1,784</td>
</tr>
<tr>
<td>La Mesa</td>
<td>231</td>
<td>220</td>
<td>159</td>
<td>7,862</td>
<td>8,472</td>
<td>8,021</td>
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<tr>
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<td>135</td>
<td>176</td>
<td>190</td>
<td>1,220</td>
<td>1,721</td>
<td>1,410</td>
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<tr>
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<td>488</td>
<td>4,275</td>
<td>14,892</td>
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<td>19,167</td>
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<td>1,452</td>
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<td>149,784</td>
<td>233,805</td>
<td>201,050</td>
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<tr>
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<td>944</td>
<td>2,049</td>
<td>882</td>
<td>6,167</td>
<td>2,931</td>
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<tr>
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<td>1,650</td>
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<tr>
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<td>932</td>
<td>604</td>
<td>10,988</td>
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<td>11,592</td>
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<tr>
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<td><strong>228,322</strong></td>
<td><strong>435,200</strong></td>
<td><strong>300,327</strong></td>
</tr>
</tbody>
</table>

* 2050 Capacity is for discussion purposes only. 2050 Capacity includes visionary inputs beyond existing, adopted general plans.

* The 20+ du/ac capacity for the Unincorporated Area was revised to reflect the County of San Diego's assessment of its lower income capacity.

Notes:

- **(a)** Estimated housing capacity at less than 10 dwelling units per acre based on input provided by local jurisdictions for the 2050 Regional Growth Forecast
- **(b)** Estimated housing capacity at 10-19 dwelling units per acre
- **(c)** Estimated housing capacity at 20-29 dwelling units per acre
- **(d)** Estimated housing capacity at 30+ dwelling units per acre
- **(e)** Estimated total housing capacity
- **(f)** Estimated housing capacity at 20+ du/ac (c) + (d)

(The 20+ du/ac capacity in column (f) for the Unincorporated Area was adjusted to reflect the County of San Diego’s assessment of its lower income capacity.)
### Table 1c. Regional Share Option

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<tr>
<th>11-Year RHNA (1/1/2010 - 12/31/2020)</th>
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<tbody>
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<td><strong>Table 1c. Regional Share Option</strong></td>
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<td><strong>RHNA Allocation Based on Regionwide %</strong></td>
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<td><strong>Est. Existing Plan Capacity</strong></td>
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<tr>
<td><strong>Est. 2050 Capacity</strong></td>
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<tr>
<td><strong>Difference between VL+L Allocation and 20+ Capacity (Existing)</strong></td>
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<tr>
<td><strong>20+ du/ac Capacity</strong></td>
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<tr>
<td><strong>20+ du/ac Capacity (2050)</strong></td>
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<tr>
<td><strong>Difference between VL+L Allocation and 20+ Capacity (2050)</strong></td>
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<table>
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<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
<th>VL + Low</th>
<th>Difference between VL+L Allocation and 20+ Capacity (Existing)</th>
<th>20+ du/ac Capacity</th>
<th>20+ du/ac Capacity (2050)</th>
<th>Difference between VL+L Allocation and 20+ Capacity (2050)</th>
</tr>
</thead>
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<td></td>
<td>(a)</td>
<td>(b)</td>
<td>(c)</td>
<td>(d)</td>
<td>(e)</td>
<td>(f)</td>
<td>(g)</td>
<td>(h)</td>
<td>(i)</td>
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<td>5,094</td>
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<td>20</td>
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<td>270</td>
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<td>-250</td>
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<tr>
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<td>100</td>
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<td>128</td>
<td>123</td>
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<td>16,649</td>
<td>36,559</td>
<td>34,888</td>
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</tr>
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<td>3,670</td>
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<tr>
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<td><strong>27,700</strong></td>
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<td><strong>67,220</strong></td>
<td><strong>64,150</strong></td>
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<td><strong>27,700</strong></td>
<td><strong>30,610</strong></td>
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<td><strong>11-YEAR RHNA</strong></td>
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<td><strong>27,700</strong></td>
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<tr>
<td><strong>Distribution</strong></td>
<td>22.5%</td>
<td>17.1%</td>
<td>18.9%</td>
<td>41.5%</td>
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<td>22.5%</td>
<td>17.1%</td>
<td>18.9%</td>
<td>41.5%</td>
</tr>
</tbody>
</table>

* 2050 Capacity is for discussion purposes only. 2050 Capacity includes visionary inputs beyond existing, adopted general plans.

Notes:

(a) 2050 Regional Growth Forecast pro-rated to 11-year RHNA Determination. The Forecast is based on information from local jurisdictions regarding existing and future land use policies and inputs.
(b) Very Low Income unit allocation by jurisdiction (based on 22.5% of total)
(c) Low Income unit allocation by jurisdiction (based on 17.1% of total)
(d) Moderate Income unit allocation by jurisdiction (based on 18.9% of total)
(e) Above Moderate Income unit allocation by jurisdiction (based on 41.5% of total)
(f) Sum of Very Low + Low Income unit allocation (b) + (c)
(g) Difference between Low + Very Low Income unit allocation and estimated capacity at 20+ du/acre = (f) - (h)
(h) Estimated Existing Plan housing capacity at 20+ du/ac
(i) Estimated 2050 housing capacity at 20+ du/ac
(j) Difference between Low + Very Low Income unit allocation and estimated 2050 capacity at 20+ du/ac = (f) - (i)
### Table 2b. Lower Income Capacity Option

**SANDAG STAFF RECOMMENDATION**

FORWARDED TO BOARD BY RPC ON 5/6/11

<table>
<thead>
<tr>
<th></th>
<th>RHNA Allocation by Income Category</th>
<th>Est. Existing Capacity</th>
<th>Est. 2050 Capacity*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>11 years Very Low Low Moderate Above Moderate VL + Low**</td>
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<td>20+ du/ac</td>
</tr>
<tr>
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<td>(a)</td>
<td>(b)</td>
<td>(c)</td>
</tr>
<tr>
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<td>912</td>
<td>693</td>
</tr>
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<td>Chula Vista</td>
<td>12,861</td>
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<td>2,439</td>
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<tr>
<td>Coronado</td>
<td>50</td>
<td>13</td>
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<tr>
<td>Del Mar</td>
<td>61</td>
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<td>El Cajon</td>
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<tr>
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<td>Lemon Grove</td>
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<td>77</td>
<td>59</td>
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<tr>
<td>National City</td>
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<td>465</td>
<td>353</td>
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<tr>
<td>Oceanside</td>
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<tr>
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<td>201</td>
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<td>88,096</td>
<td>21,977</td>
<td>16,703</td>
</tr>
<tr>
<td>San Marcos</td>
<td>4,183</td>
<td>1,043</td>
<td>793</td>
</tr>
<tr>
<td>Santee</td>
<td>3,660</td>
<td>914</td>
<td>694</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>340</td>
<td>85</td>
<td>65</td>
</tr>
<tr>
<td>Vista</td>
<td>1,374</td>
<td>343</td>
<td>260</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>22,412</td>
<td>2,085</td>
<td>1,585</td>
</tr>
<tr>
<td><strong>Region</strong></td>
<td><strong>161,980</strong></td>
<td><strong>36,450</strong></td>
<td><strong>27,700</strong></td>
</tr>
<tr>
<td><strong>11-YEAR RHNA</strong></td>
<td><strong>36,450</strong></td>
<td><strong>27,700</strong></td>
<td><strong>30,610</strong></td>
</tr>
<tr>
<td></td>
<td>22.5%</td>
<td>17.1%</td>
<td>18.9%</td>
</tr>
</tbody>
</table>

* 2050 Capacity is for discussion purposes only. 2050 Capacity includes visionary inputs beyond existing, adopted general plans.

**Allocation proposal is based on Existing Plan capacity, or regional allocation, whichever is lower in jurisdictions where Existing Plan capacity is exceeded (see bolded numbers in Table 1c, column (j) )

**Notes:**

(a) 2050 Regional Growth Forecast pro-rated to 11-year RHNA Determination.
The Forecast is based on information from local jurisdictions regarding existing and future land use policies and inputs.

(b) Very Low Income unit allocation by jurisdiction (based on 22.5% of total, or Existing Plan capacity for 20+ du/acre).

(c) Low Income unit allocation by jurisdiction (based on 17.1% of total, or Existing Plan capacity for 20+ du/acre).

(d) Moderate Income unit allocation by jurisdiction (balance of total minus other Income categories) = (a) - (b) - (c) - (e)

(e) Above Moderate Income unit allocation by jurisdiction (based on 41.5% of total, or balance of units).

(f) Sum of Very Low + Low Income unit allocation = (b) + (c)

(g) Estimated Existing Plan housing capacity at 20+ du/ac

(h) Estimated 2050 housing capacity at 20+ du/ac
Table 2c: Lower Income Capacity Option with Jobs/Housing Balance Adjustment

11-Year RHNA (1/1/2010 - 12/31/2020)

<table>
<thead>
<tr>
<th>Jobs/Housing Balance Adjustment</th>
<th>Est. Existing Plan Capacity</th>
<th>Est. 2050 Capacity*</th>
<th>Difference between VL+L Allocation and 20+ du/ac Capacity (Existing)</th>
<th>Difference between VL+L Allocation and 20+ du/ac Capacity (2050)</th>
</tr>
</thead>
<tbody>
<tr>
<td>11 year RHNA 11/9 Proposal*(a)</td>
<td>(b)</td>
<td>(c)</td>
<td>(d)</td>
<td>(e)</td>
</tr>
<tr>
<td>Carlsbad</td>
<td>4,999</td>
<td>1,605</td>
<td>1.4599</td>
<td>0.2596</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>12,861</td>
<td>5,364</td>
<td>0.9315</td>
<td>-0.2688</td>
</tr>
<tr>
<td>Coronado</td>
<td>56</td>
<td>21</td>
<td>0.8627</td>
<td>-0.3376</td>
</tr>
<tr>
<td>Del Mar</td>
<td>61</td>
<td>12</td>
<td>1.6038</td>
<td>0.4035</td>
</tr>
<tr>
<td>El Cajon</td>
<td>5,085</td>
<td>2,430</td>
<td>1.1346</td>
<td>-0.0657</td>
</tr>
<tr>
<td>Encinitas</td>
<td>2,353</td>
<td>985</td>
<td>1.0904</td>
<td>-0.1099</td>
</tr>
<tr>
<td>Escondido</td>
<td>4,175</td>
<td>1,747</td>
<td>1.3262</td>
<td>-0.1246</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>254</td>
<td>106</td>
<td>0.7581</td>
<td>-0.4422</td>
</tr>
<tr>
<td>La Mesa</td>
<td>1,722</td>
<td>721</td>
<td>1.0757</td>
<td>-0.0630</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>309</td>
<td>130</td>
<td>0.8893</td>
<td>-0.3310</td>
</tr>
<tr>
<td>National City</td>
<td>1,863</td>
<td>780</td>
<td>1.2898</td>
<td>0.0447</td>
</tr>
<tr>
<td>Oceanside</td>
<td>6,210</td>
<td>2,600</td>
<td>0.6960</td>
<td>-0.5043</td>
</tr>
<tr>
<td>Poway</td>
<td>1,253</td>
<td>353</td>
<td>1.8793</td>
<td>0.6790</td>
</tr>
<tr>
<td>San Diego</td>
<td>88,096</td>
<td>36,873</td>
<td>1.4529</td>
<td>0.2526</td>
</tr>
<tr>
<td>San Marcos</td>
<td>4,183</td>
<td>1,750</td>
<td>1.3585</td>
<td>0.1582</td>
</tr>
<tr>
<td>Santee</td>
<td>3,660</td>
<td>1,533</td>
<td>0.7596</td>
<td>-0.4407</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>340</td>
<td>143</td>
<td>1.1771</td>
<td>-0.0232</td>
</tr>
<tr>
<td>Vista</td>
<td>1,374</td>
<td>575</td>
<td>1.4142</td>
<td>0.2139</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>22,412</td>
<td>6,402</td>
<td>0.6336</td>
<td>-0.5667</td>
</tr>
<tr>
<td>Region</td>
<td>161,980</td>
<td>64,150</td>
<td>12003</td>
<td>904</td>
</tr>
</tbody>
</table>

Notes:

(a) 2050 Regional Growth Forecast pro-rated to 11-year RHNA Determination.
(b) Sum of Very Low + Low Income unit allocation from Table 2a column (f)
(c) Projected jobs/housing ratio in 2020
(d) Variance of each jurisdiction's jobs/housing ratio from the regional average = 1.2003 (regional average) - (c)
(e) Half of Variance = (d) * 1/2
(f) Uncontrolled Adjustment of jobs/housing ratio = (b) * (e)
(g) Adjustment of jobs/housing balance = (b) * (e) controlled to a net balance of zero regionwide
(h) New Very Low + Low Income unit allocation with controlled jobs/housing factor = (b) + (g)
(i) Difference between Very Low + Low Income unit allocation and estimated 20+ du/ac capacity
(j) Estimated Existing Plan housing capacity at 20+ du/ac
(k) Estimated 2050 housing capacity at 20+ du/ac
(l) Difference between Very Low + Low Income unit allocation and estimated 2050 capacity at 20+ du/ac
<table>
<thead>
<tr>
<th>City</th>
<th>2050 Capacity (est.)</th>
<th>Existing 20+ du/ac Capacity</th>
<th>Difference between VL + L unit allocation and estimated 20+ du/ac capacity (k) - (o)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carlsbad</td>
<td>4,999</td>
<td>1,980</td>
<td>2,019</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>12,861</td>
<td>5,094</td>
<td>7,767</td>
</tr>
<tr>
<td>Coronado</td>
<td>50</td>
<td>20</td>
<td>30</td>
</tr>
<tr>
<td>Del Mar</td>
<td>61</td>
<td>24</td>
<td>37</td>
</tr>
<tr>
<td>El Cajon</td>
<td>5,805</td>
<td>2,299</td>
<td>3,506</td>
</tr>
<tr>
<td>Encinitas</td>
<td>2,353</td>
<td>932</td>
<td>1,421</td>
</tr>
<tr>
<td>Escondido</td>
<td>4,175</td>
<td>1,653</td>
<td>2,522</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>1,893</td>
<td>738</td>
<td>1,155</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>2,375</td>
<td>912</td>
<td>1,463</td>
</tr>
<tr>
<td>National City</td>
<td>6,210</td>
<td>2,480</td>
<td>3,730</td>
</tr>
<tr>
<td>Oceanside</td>
<td>1,374</td>
<td>544</td>
<td>830</td>
</tr>
<tr>
<td>Poway</td>
<td>2,375</td>
<td>912</td>
<td>1,463</td>
</tr>
<tr>
<td>San Diego</td>
<td>1,863</td>
<td>738</td>
<td>1,155</td>
</tr>
<tr>
<td>Santee</td>
<td>3,660</td>
<td>1,450</td>
<td>2,210</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>340</td>
<td>135</td>
<td>205</td>
</tr>
</tbody>
</table>

Notes:
(a) 2050 Regional Growth Forecast pro-rated to 11-year RHNA Determination. The Forecast is based on information from local jurisdictions regarding existing and future land use policies and inputs.
(b) Very Low + Low Income unit allocation based on regionwide shares.
(c) Projected jobs/housing ratio in 2020.
(d) Variance of each jurisdiction's jobs/housing ratio from the regional average.
(e) Half of Variance = (d) x 1/2.
(f) Adjustment for jobs/housing balance = (b) x (e) controlled to a net balance of 0 regionwide.
(g) Percentage of Very Low + Low Income Households in each jurisdiction (2000 Census).
(h) Variance from regional average of VL + L Income Households = 39.6% - (g).
(i) New Very Low + Low Income unit allocation with controlled jobs/housing factor & controlled variance.
(j) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.
(k) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.
(l) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.
(m) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.
(n) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.
(o) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.
(p) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.
(q) New Very Low + Low Income unit allocation with controlled (phasing/sharing) & controlled variance.

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RHNA PLAN : Fifth Housing Element Cycle Planning for Housing in the San Diego Region 2010 - 2020
### Table 3c: Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment

**11-Year RHNA (1/1/2010 - 12/31/2020)**

<table>
<thead>
<tr>
<th>City</th>
<th>Population</th>
<th>Jobs/Housing Balance</th>
<th>Income Adjustment</th>
<th>Transit Adjustment</th>
<th>2050 Capacity</th>
<th>Difference between VL+L Capacity and 20+ du/acre Capacity (Existing)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carlsbad</td>
<td>4,999</td>
<td>1,980</td>
<td>1.4599</td>
<td>0.2596</td>
<td>0.1298</td>
<td>237</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>12,861</td>
<td>5,094</td>
<td>0.9159</td>
<td>-0.2688</td>
<td>-0.1344</td>
<td>749</td>
</tr>
<tr>
<td>Coronado</td>
<td>500</td>
<td>20</td>
<td>1.8027</td>
<td>-0.3376</td>
<td>-0.1680</td>
<td>14</td>
</tr>
<tr>
<td>Del Mar</td>
<td>61</td>
<td>24</td>
<td>1.6058</td>
<td>0.4035</td>
<td>0.2017</td>
<td>65</td>
</tr>
<tr>
<td>El Cajon</td>
<td>5,805</td>
<td>2,299</td>
<td>1.1346</td>
<td>-0.0657</td>
<td>-0.0325</td>
<td>83</td>
</tr>
<tr>
<td>Encinitas</td>
<td>2,353</td>
<td>932</td>
<td>1.0004</td>
<td>-0.1099</td>
<td>-0.0548</td>
<td>44</td>
</tr>
<tr>
<td>Escondido</td>
<td>4,175</td>
<td>1,655</td>
<td>1.3182</td>
<td>0.1259</td>
<td>0.0629</td>
<td>96</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>254</td>
<td>100</td>
<td>0.7561</td>
<td>-0.4422</td>
<td>-0.2211</td>
<td>24</td>
</tr>
<tr>
<td>La Mesa</td>
<td>1,722</td>
<td>659</td>
<td>1.0575</td>
<td>-0.1246</td>
<td>-0.0623</td>
<td>46</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>309</td>
<td>123</td>
<td>0.8093</td>
<td>-0.3310</td>
<td>-0.1655</td>
<td>22</td>
</tr>
<tr>
<td>National City</td>
<td>1,626</td>
<td>702</td>
<td>1.2388</td>
<td>0.0685</td>
<td>0.0475</td>
<td>31</td>
</tr>
<tr>
<td>Oceanside</td>
<td>6,210</td>
<td>2,460</td>
<td>0.6960</td>
<td>-0.5043</td>
<td>-0.2521</td>
<td>67</td>
</tr>
<tr>
<td>Poway</td>
<td>1,263</td>
<td>496</td>
<td>1.8793</td>
<td>0.6790</td>
<td>0.3395</td>
<td>155</td>
</tr>
<tr>
<td>San Diego</td>
<td>80,409</td>
<td>34,885</td>
<td>1.4629</td>
<td>0.2526</td>
<td>0.12630</td>
<td>4,063</td>
</tr>
<tr>
<td>San Marcos</td>
<td>4,183</td>
<td>1,656</td>
<td>1.3385</td>
<td>0.1582</td>
<td>0.0791</td>
<td>121</td>
</tr>
<tr>
<td>Santee</td>
<td>3,660</td>
<td>1,455</td>
<td>0.7596</td>
<td>-0.4407</td>
<td>-0.2205</td>
<td>349</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>3,282</td>
<td>139</td>
<td>0.9771</td>
<td>-0.0232</td>
<td>-0.0165</td>
<td>2</td>
</tr>
<tr>
<td>Vista</td>
<td>1,374</td>
<td>544</td>
<td>1.1442</td>
<td>0.2139</td>
<td>0.1065</td>
<td>54</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>22,412</td>
<td>8,792</td>
<td>0.6395</td>
<td>-0.0967</td>
<td>-0.0694</td>
<td>2,233</td>
</tr>
<tr>
<td>Region</td>
<td>161,980</td>
<td>64,150</td>
<td>1.2003</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0</td>
</tr>
</tbody>
</table>

Notes:

(a) 2050 Regional Growth Forecast pro-rated to 11-year RHNA Determination.

(b) Very Low = Low Income unit allocation based on regionwide shares.

(c) Projected jobs/housing ratio in 2020.

(d) Variance of each jurisdiction's jobs/housing ratio from the regional average = 1.2003 (regional average) - (c).

(e) Half of Variance = (d) / 2.

(f) Adjustment for jobs/housing balance = (b) + (e) controlled to a net balance of 0 regionwide.

(g) Percentage of Very Low + Low Income households in each jurisdiction (2000 Census).

(h) Variance from regional average of VL+L Income Households = 36.9% - (g).

(i) Half of Variance = (h) / 2.

(j) Percent of each jurisdiction's capacity within 1/4 mile of a transit stop.

(k) Variance of each jurisdiction's transit accessible housing unit capacity from incorporated average = (i) - 69%.

(l) Adjustment for transit = (m) * (n) controlled to a net balance of 0 regionwide.

(m) Very Low = Low Income unit allocation with controlled Jobs/Housing, Income, & Transit adjustments = (b) + (f) + (g).

(n) Adjustment for income distribution = (b) * (i) controlled to a net balance of 0 regionwide.

(o) Difference between VL+L Income unit allocation and existing 20+ du/acre capacity = (d) - (o).

(p) Difference between Very Low = Low Income unit allocation and estimated 2050 capacity at 20+ du/acre = (o) - (o).

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RHNA PLAN : Fifth Housing Element Cycle Planning for Housing in the San Diego Region 2010 - 2020

51

(a)
4,999
12,861
50
61
5,805
2,353
4,175
254
1,722
309
1,863
6,210
1,253
88,096
4,183
3,660
340
1,374
22,412
161,980

1,980
5,094
20
24
2,299
932
1,653
100
682
123
738
2,460
496
34,888
1,656
1,450
135
544
8,876
64,150

(b)

VL+ Low
(Regionwide
Shares)

1

60,480

(c)
2,166
5,574
22
26
2,516
1,020
1,809
109
746
135
807
2,692
543
38,173
1,812
1,587
148
595

New
Starting
Shares*

(d)
1.4599
0.9315
0.8627
1.6038
1.1346
1.0904
1.3262
0.7581
1.0757
0.8693
1.2898
0.6960
1.8793
1.4529
1.3585
0.7596
1.1771
1.4142
0.6336
1.2003

(e)
0.2596
-0.2688
-0.3376
0.4035
-0.0657
-0.1099
0.1259
-0.4422
-0.1246
-0.3310
0.0895
-0.5043
0.6790
0.2526
0.1582
-0.4407
-0.0232
0.2139
-0.57

(f)
0.12980
-0.13440
-0.16880
0.20175
-0.03285
-0.05495
0.06295
-0.22110
-0.06230
-0.16550
0.04475
-0.25215
0.33950
0.12630
0.07910
-0.22035
-0.01160
0.10695
-0.28
0

191
-1,424
-8
4
-158
-107
78
-46
-88
-42
25
-1,291
125
3,270
97
-666
-4
44

(g)

(h)
26.57%
41.65%
25.31%
25.16%
52.60%
26.99%
43.82%
52.40%
44.37%
46.75%
61.14%
39.51%
21.14%
41.26%
40.00%
31.54%
26.99%
42.49%
34%
39.60%

Transit Adjustment

0

220
-42
3
3
-121
100
-28
-5
-13
-3
-64
2
78
-234
-3
99
14
-6

(k)

(l)
36.29%
60.88%
83.68%
74.65%
77.28%
53.90%
64.34%
94.20%
90.20%
68.91%
94.29%
42.00%
0.00%
71.40%
50.63%
2.87%
32.08%
73.83%
1%

(m)
-31.98%
-7.39%
15.41%
6.38%
9.01%
-14.37%
-3.93%
25.93%
21.93%
0.64%
26.02%
-26.27%
-68.27%
3.13%
-17.63%
-65.40%
-36.19%
5.56%
-67%

Percent
Housing
Unit
Variance
Capacity
from
Controlled w/in a Qtr
Incorporated
Mi of
Income
Half of
Variance Adjustment Transit** Average***

(i)
(j)
13.03%
6.515%
-2.05% -1.025%
14.29%
7.145%
14.44%
7.220%
-13.00% -6.500%
12.61%
6.305%
-4.22% -2.110%
-12.80% -6.400%
-4.77% -2.385%
-7.15% -3.575%
-21.54% -10.770%
0.09%
0.045%
18.46%
9.230%
-1.66% -0.830%
-0.40% -0.200%
8.06%
4.030%
12.61%
6.305%
-2.89% -1.445%

Controlled
Variance
Adjustment
from
for Jobs/ Households
Half of
Housing by Income - Regional
Variance
Average
VL + L
Balance

Income Adjustment

(a) 2050 Regional Growth Forecast pro-rated to 11-year RHNA Determination.
The Forecast is based on information from local jurisdictions regarding existing and future land use policies and inputs.
(b) Very Low + Low Income unit allocation based on regionwide shares
(c) New Starting Shares
(d) Projected jobs/housing balance in 2020
(e) Variance of each jurisdiction's jobs/housing ratio from the regional average = 1.2003 (regional average) - (c)
(f) Half of Variance = (e) * 1/2
(g) Adjustment for jobs/housing balance = (c) * (f) controlled to a net balance of 0 regionwide
(h) Percentage of Very Low + Low Income Households in each jurisdiction (2000 Census)
(i) Variance from regional average of VL+ L Income Households = 39.6% - (g)
(j) Half of Variance = (i) * 1/2

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Notes:
(k)
(l)
(m)
(n)
(o)
(p)
(q)
(r)
(s)
(t)
(u)

(n)
-15.99%
-3.70%
7.71%
3.19%
4.51%
-7.19%
-1.97%
12.97%
10.97%
0.32%
13.01%
-13.14%
-34.14%
1.57%
-8.82%
-32.70%
-18.10%
2.78%

Half of
Variance

Est. 2050
Capacity*

(o)

0

-258
-153
3
1
173
-55
-27
22
125
0
160
-263
-138
910
-119
-386
-20
25

2,319
3,955
20
34
2,410
958
1,832
80
770
90
928
1,140
608
42,119
1,787
634
138
658
3,670
64,150

(p)

(q)
144%
18%
7%
283%
18%
74%
71%
4%
12%
11%
5%
24%
172%
27%
61%
38%
53%
38%
100%

(r)
714
-17,944
-250
22
-10,815
-335
-750
-1,704
-5,728
-738
-17,272
-3,611
255
-116,154
-1,144
-1,016
-124
-1,073
0

(s)
1,605
21,899
270
12
13,225
1,293
2,582
1,784
6,498
828
18,200
4,751
353
158,273
2,931
1,650
262
1,731
3,670

(t)
1,605
23,092
270
12
13,225
1,293
4,043
1,784
8,021
1,410
19,167
4,751
353
201,050
2,931
1,650
408
11,592
3,670

(u)
714
-19,137
-250
22
-10,815
-335
-2,211
-1,704
-7,251
-1,320
-18,239
-3,611
255
-158,931
-1,144
-1,016
-270
-10,934
0

VL + L
Difference
Allocation Difference
VL + L
between
between
as
VL+L
VL+L
Allocation After Percentage
Allocation
Allocation
of 20+
Jobs/Housing,
Controlled
and 20+
and 20+
du/acre
Income &
Adjustment
Capacity 20+ du/ac 20+ du/ac Capacity
Capacity
Transit
for Transit
(2050)
(Existing) (Existing) Capacity Capacity
Adjustment

Est.
Existing
Plan
Capacity

FORWARDED TO BOARD BY RPC ON 5/6/11

Adjustment for income distribution = (c) * (j) controlled to a net balance of 0 regionwide
Percent of each jurisdiction's capacity within 1/4 mile of a transit stop
Variance of each jurisdiction's transit accessible housing capacity from incorporated average = (l) - 69%
Half of variance = (m) * 1/2
Adjustment for transit =(n) *(c) controlled to a net balance of 0 regionwide
Very Low + Low Income unit allocation with controlled Jobs/Housing, income, & Transit adjustment= (c) + (g) + (k) + (o)
Very Low + Low unit allocation expressed as a percentage of existing 20+ du/acre capacity = (p)/(s)
Difference between Very Low + Low Income unit allocation and existing 20+ du/acre capacity = (p) - (s)
Estimated Existing Plan housing capacity at 20+ du/acre
Estimated 2050 housing capacity at 20+ du/acre
Difference between Very Low + Low Income unit allocation and estimated 2050 capacity at 20+ du/acre = (p) - (t)

** For this analysis, the transit types included are: Bus Rapid Transit (BRT), rail, and local and express bus routes with 15 minute headways or better during peak periods
*** For this calculation, the incorporated area housing capacity average was used as opposed to the regional average. This is based on the fact that the Unincorporated Area has litte transit service
and very low density land which significantly reduces the regional average housing capacity within a quarter mile of transit.

*New starting shares based on VL + L Regionwide Shares with an adjustment made to cap the Unincorporated Area at 3,670 units, and 5,206 units distributed proportionally to the remaining jurisdictions

Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
Unincorporated
Region

11 year
RHNA

Variance
from
Jobs/Housing Regional
Ratio (2020) Average

Jobs/Housing Balance Adjustment

Table 3d: Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Area Capacity Adjustment

11-Year RHNA (1/1/2010 - 12/31/2020)


### Table 4. Households by Income and Very Low & Low Income Allocation Percentages for RHNA Options

**11-Year RHNA (1/1/2010 - 12/31/2020)**

<table>
<thead>
<tr>
<th>Households by Income (2000 Census)</th>
<th>Regional Share Option (Table 1c)</th>
<th>Lower Income Capacity Option with Jobs/Housing Balance Adjustment (Table 2b)</th>
<th>Lower Income Capacity Option with Jobs/Housing Balance and Income Adjustment (Table 2c)</th>
<th>Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment (Table 3a)</th>
<th>Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Area Capacity Adjustment (Table 3d)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Carlsbad</strong></td>
<td>27%</td>
<td>40%</td>
<td>32%</td>
<td>36%</td>
<td>47%</td>
</tr>
<tr>
<td><strong>Chula Vista</strong></td>
<td>42%</td>
<td>40%</td>
<td>44%</td>
<td>36%</td>
<td>33%</td>
</tr>
<tr>
<td><strong>Coronado</strong></td>
<td>25%</td>
<td>40%</td>
<td>44%</td>
<td>32%</td>
<td>34%</td>
</tr>
<tr>
<td><strong>Del Mar</strong></td>
<td>25%</td>
<td>40%</td>
<td>20%</td>
<td>23%</td>
<td>51%</td>
</tr>
<tr>
<td><strong>El Cajon</strong></td>
<td>53%</td>
<td>40%</td>
<td>44%</td>
<td>40%</td>
<td>36%</td>
</tr>
<tr>
<td><strong>Encinitas</strong></td>
<td>27%</td>
<td>40%</td>
<td>44%</td>
<td>39%</td>
<td>40%</td>
</tr>
<tr>
<td><strong>Escondido</strong></td>
<td>44%</td>
<td>40%</td>
<td>44%</td>
<td>44%</td>
<td>41%</td>
</tr>
<tr>
<td><strong>Imperial Beach</strong></td>
<td>52%</td>
<td>40%</td>
<td>44%</td>
<td>31%</td>
<td>28%</td>
</tr>
<tr>
<td><strong>La Mesa</strong></td>
<td>44%</td>
<td>40%</td>
<td>44%</td>
<td>39%</td>
<td>36%</td>
</tr>
<tr>
<td><strong>Lemon Grove</strong></td>
<td>47%</td>
<td>40%</td>
<td>44%</td>
<td>34%</td>
<td>31%</td>
</tr>
<tr>
<td><strong>National City</strong></td>
<td>61%</td>
<td>40%</td>
<td>44%</td>
<td>44%</td>
<td>37%</td>
</tr>
<tr>
<td><strong>Oceanside</strong></td>
<td>40%</td>
<td>40%</td>
<td>44%</td>
<td>30%</td>
<td>29%</td>
</tr>
<tr>
<td><strong>Poway</strong></td>
<td>21%</td>
<td>40%</td>
<td>28%</td>
<td>37%</td>
<td>56%</td>
</tr>
<tr>
<td><strong>San Diego</strong></td>
<td>41%</td>
<td>40%</td>
<td>44%</td>
<td>47%</td>
<td>44%</td>
</tr>
<tr>
<td><strong>San Marcos</strong></td>
<td>40%</td>
<td>40%</td>
<td>44%</td>
<td>45%</td>
<td>42%</td>
</tr>
<tr>
<td><strong>Santee</strong></td>
<td>32%</td>
<td>40%</td>
<td>44%</td>
<td>32%</td>
<td>32%</td>
</tr>
<tr>
<td><strong>Solana Beach</strong></td>
<td>27%</td>
<td>40%</td>
<td>44%</td>
<td>41%</td>
<td>42%</td>
</tr>
<tr>
<td><strong>Vista</strong></td>
<td>42%</td>
<td>40%</td>
<td>44%</td>
<td>46%</td>
<td>43%</td>
</tr>
<tr>
<td><strong>Unincorporated</strong></td>
<td>34%</td>
<td>40%</td>
<td>16%</td>
<td>16%</td>
<td>29%</td>
</tr>
<tr>
<td><strong>Region</strong></td>
<td>40%</td>
<td>40%</td>
<td>40%</td>
<td>40%</td>
<td>40%</td>
</tr>
</tbody>
</table>

**Notes:**

(a) Proportion of households in Very Low and Low Income categories (Where "Very Low" is defined as less than 50% of regional median household income and "Low" is defined as 50-80% of regional median household income defined by California Dept. of Housing and Community Development).

(b) Percent of Very Low + Low Income Units under the Regional Share Option (Table 1c)

(c) Percent of Very Low + Low Income Units under the Lower Income Capacity Option (Table 2b)

(d) Percent of Very Low + Low Income Units under the Lower Income Capacity Option with Jobs/Housing Balance Adjustment (Table 2c)

(e) Percent of Very Low + Low Income Units under the Regional Share Option with Jobs/Housing Balance and Income Adjustment (Table 3a)

(f) Percent of Very Low + Low Income Units under the Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment (Table 3c)

(g) Percent of Very Low + Low Income Units under the Revised Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Area Capacity Adjustment (Table 3d)
### Table 5: Very Low & Low Income Allocation Numbers for RHNA Options

11-Year RHNA (1/1/2010 - 12/31/2020)

<table>
<thead>
<tr>
<th></th>
<th>Regional Share Option (Table 1c)</th>
<th>Lower Income Capacity Option (Table 2b)</th>
<th>Lower Income Capacity Option with Jobs/Housing Balance Adjustment (Table 2c)</th>
<th>Regional Share Option with Jobs/Housing Balance and Income Adjustment (Table 3a)</th>
<th>Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment (Table 3c)</th>
<th>Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Capacity Adjustment (Table 3d)</th>
<th>Estimated Existing Plan Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(a) Very Low + Low Income</td>
<td>(b) Very Low + Low Income</td>
<td>(c) Very Low + Low Income</td>
<td>(d) Very Low + Low Income</td>
<td>(e) Very Low + Low Income</td>
<td>(f) Very Low + Low Income</td>
<td>(g) Estimated Existing Plan</td>
</tr>
<tr>
<td></td>
<td>Units</td>
<td>Units</td>
<td>Units</td>
<td>Units</td>
<td>Units</td>
<td>Units</td>
<td>Housing Capacity at 20+ du/ac</td>
</tr>
<tr>
<td>Carlsbad</td>
<td>1,980</td>
<td>1,605</td>
<td>1,796</td>
<td>2,357</td>
<td>2,170</td>
<td>2,319</td>
<td>1,605</td>
</tr>
<tr>
<td>Chula Vista</td>
<td>5,094</td>
<td>5,648</td>
<td>4,586</td>
<td>4,296</td>
<td>4,185</td>
<td>3,955</td>
<td>21,899</td>
</tr>
<tr>
<td>Coronado</td>
<td>20</td>
<td>22</td>
<td>16</td>
<td>17</td>
<td>22</td>
<td>20</td>
<td>270</td>
</tr>
<tr>
<td>Del Mar</td>
<td>24</td>
<td>12</td>
<td>14</td>
<td>31</td>
<td>33</td>
<td>34</td>
<td>12</td>
</tr>
<tr>
<td>El Cajon</td>
<td>2,298</td>
<td>2,549</td>
<td>2,342</td>
<td>2,077</td>
<td>2,415</td>
<td>2,410</td>
<td>13,225</td>
</tr>
<tr>
<td>Encinitas</td>
<td>932</td>
<td>1,033</td>
<td>925</td>
<td>940</td>
<td>901</td>
<td>958</td>
<td>1,205</td>
</tr>
<tr>
<td>Escondido</td>
<td>1,653</td>
<td>1,833</td>
<td>1,845</td>
<td>1,716</td>
<td>1,687</td>
<td>1,832</td>
<td>2,582</td>
</tr>
<tr>
<td>Imperial Beach</td>
<td>100</td>
<td>111</td>
<td>80</td>
<td>70</td>
<td>112</td>
<td>80</td>
<td>1,784</td>
</tr>
<tr>
<td>La Mesa</td>
<td>682</td>
<td>756</td>
<td>671</td>
<td>621</td>
<td>865</td>
<td>770</td>
<td>6,498</td>
</tr>
<tr>
<td>Lemon Grove</td>
<td>123</td>
<td>136</td>
<td>106</td>
<td>97</td>
<td>98</td>
<td>90</td>
<td>828</td>
</tr>
<tr>
<td>National City</td>
<td>738</td>
<td>818</td>
<td>812</td>
<td>695</td>
<td>1,009</td>
<td>928</td>
<td>18,200</td>
</tr>
<tr>
<td>Oceanside</td>
<td>2,460</td>
<td>2,727</td>
<td>1,877</td>
<td>1,784</td>
<td>1,593</td>
<td>1,140</td>
<td>4,751</td>
</tr>
<tr>
<td>Poway</td>
<td>496</td>
<td>353</td>
<td>463</td>
<td>701</td>
<td>601</td>
<td>608</td>
<td>353</td>
</tr>
<tr>
<td>San Diego</td>
<td>34,888</td>
<td>38,680</td>
<td>41,135</td>
<td>38,682</td>
<td>40,467</td>
<td>42,119</td>
<td>158,273</td>
</tr>
<tr>
<td>San Marcos</td>
<td>1,656</td>
<td>1,836</td>
<td>1,877</td>
<td>1,774</td>
<td>1,688</td>
<td>1,787</td>
<td>2,931</td>
</tr>
<tr>
<td>Santee</td>
<td>1,450</td>
<td>1,608</td>
<td>1,160</td>
<td>1,164</td>
<td>884</td>
<td>634</td>
<td>1,650</td>
</tr>
<tr>
<td>Solana Beach</td>
<td>135</td>
<td>150</td>
<td>141</td>
<td>143</td>
<td>129</td>
<td>138</td>
<td>262</td>
</tr>
<tr>
<td>Vista</td>
<td>544</td>
<td>603</td>
<td>631</td>
<td>590</td>
<td>640</td>
<td>658</td>
<td>1,731</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>8,876</td>
<td>3,670</td>
<td>3,670</td>
<td>6,395</td>
<td>4,641</td>
<td>3,670</td>
<td>3,670</td>
</tr>
<tr>
<td>Region</td>
<td>64,150</td>
<td>64,150</td>
<td>64,150</td>
<td>64,150</td>
<td>64,150</td>
<td>64,150</td>
<td>241,917</td>
</tr>
</tbody>
</table>

Notes:

(a) Very Low + Low Income Units under the Regional Share Option (Table 1c)
(b) Very Low + Low Income Units under the Lower Income Capacity Option (Table 2b)
(c) Very Low + Low Income Units under the Lower Income Capacity Option with Jobs/Housing Balance Adjustment (Table 2c)
(d) Very Low + Low Income Units under the Regional Share Option with Jobs/Housing Balance and Income Adjustment (Table 3a)
(e) Very Low + Low Income Units under the Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment (Table 3c)
(f) Very Low + Low Income Units under the Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Capacity Adjustment (Table 3d)
(g) Estimated Existing Plan Housing Capacity at 20+ du/ac
Regional Housing Needs Assessment Plan

Fifth Housing Element Cycle
Planning for Housing in the San Diego Region

2010 - 2020

401 B Street, Suite 800, San Diego, CA 92101
(619) 699-1900 • sandag.org
July 27, 2011

**City of Chula Vista**  
Gary Halbert, Assistant City Manager/Development Services Director

<table>
<thead>
<tr>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1: Mayor Cox as Chula Vista’s representative on the SANDAG Board initially supported Option 3d.</td>
<td>Comment noted.</td>
</tr>
</tbody>
</table>

**#2:** Ultimately, in support of regional cooperation Mayor Cox voted for Option 2b; however, we believe that the RHNA allocation as proposed in Option 2b raises equity issues in the region. We believe that Option 2b burdens those jurisdictions that have added additional capacity in their General Plans to provide for their fair share of housing at higher densities to accommodate more than their share of lower income households. As proposed the RHNA allocation does not take into account existing concentrations of lower income persons, as required by housing element law. It polarizes affordable housing capacity into a few jurisdictions in the region and does not support the balanced provision of Affordable Housing through the entire San Diego region.

Option 2b meets the RHNA objectives in state law and the requirements of SB 375 as follows:

- It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.
- It utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS. Over 80 percent of the new housing built in the region will be multifamily.
- It promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.
- It also moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b moves most jurisdictions closer to the regional percentage of lower income households with the exception of Del Mar and the unincorporated area of the San Diego County. The small size of Del Mar and the rural nature and lack of infrastructure in most of the unincorporated area of the County resulted in RHNA allocations with a lower
City of Chula Vista (continued)  

#3: Chula Vista agrees that lower-income housing in particular should be focused into urbanized/urbanizing areas close to transit/transportation investments and services. This is consistent with the RCP and RTP. The Board has taken the position that this is best served through Option 2b. The Board should now assist jurisdictions that accept the additional affordable housing allocation in order to make Option 2b more viable. Regional transit, infrastructure and service funding considerations should be directed to those areas that will be accommodating the density sufficient to support affordable housing.

<table>
<thead>
<tr>
<th>City of Chula Vista</th>
<th>percentage of lower income housing than the regional percentage of lower income households.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SANDAG integrated the preparation of the 2050 RTP/SCS and RHNA in several ways. RHNA Option 2b supports the region’s commitment to smart growth, socio-economic balance and environmental sustainability as expressed in the Regional Comprehensive Plan (RCP) as described below.</td>
<td></td>
</tr>
<tr>
<td>• Both planning documents were prepared during the same time frame, and were based on the land use pattern contained in the 2050 Regional Growth Forecast.</td>
<td></td>
</tr>
<tr>
<td>• The 2050 Forecast includes land uses and densities based on local jurisdiction existing plans and policies during the 11-year RHNA projection period.</td>
<td></td>
</tr>
<tr>
<td>• The forecast was used to help determine the transportation network for the RTP, and the RTP transit network provides new transit services that provide more transit access for many people in the region.</td>
<td></td>
</tr>
<tr>
<td>• The forecast shows that the number of housing units and jobs within a half-mile of transit nearly doubles between 2008 and 2050, thus providing workers of all income levels with opportunities to live close to work or to utilize transit.</td>
<td></td>
</tr>
<tr>
<td>• The forecast and RTP/SCS also shows that the San Diego region is planning for compact, higher density development located near transit and within the already urbanized areas of the region.</td>
<td></td>
</tr>
<tr>
<td>• More than 80 percent of the projected new housing in the region will be higher density.</td>
<td></td>
</tr>
<tr>
<td>• Seventy-nine percent of all housing and 86 percent of all jobs will be located in the areas where the greatest investments in public transit are being made (within the Urban Area Transit Strategy Area).</td>
<td></td>
</tr>
</tbody>
</table>

#4: We acknowledge that at the July 22 SANDAG Board Meeting the Chair created a subcommittee to review Policy No. 033 (Policy 33) and that Chula Vista’s Mayor has been appointed as the South Bay member of that subcommittee. Chula Vista believes that the updated Policy 33 should be adopted by the SANDAG Board concurrently with the adoption of the RHNA and the RTP (including the SCS). We believe that revisions to Policy 33 should include funding formulas and competitive application scoring criteria to ensure appropriate consideration is given to promoting the allocation of resources and infrastructure to those smart growth areas where affordable housing is focused under the newly adopted RHNA obligations.

| #4: We acknowledge that at the July 22 SANDAG Board Meeting the Chair created a subcommittee to review Policy No. 033 (Policy 33) and that Chula Vista’s Mayor has been appointed as the South Bay member of that subcommittee. Chula Vista believes that the updated Policy 33 should be adopted by the SANDAG Board concurrently with the adoption of the RHNA and the RTP (including the SCS). We believe that revisions to Policy 33 should include funding formulas and competitive application scoring criteria to ensure appropriate consideration is given to promoting the allocation of resources and infrastructure to those smart growth areas where affordable housing is focused under the newly adopted RHNA obligations. |
| The Board Ad Hoc Subcommittee on Policy 33 has met twice since it was appointed in July 2011. The City of Chula Vista proposed amendments to Policy 33, which have been discussed by the Subcommittee and referred to the planning directors for review based on their technical expertise. The work on Policy 33 is expected to be completed shortly after the scheduled date to adopt the 2050 RTP/SCS and RHNA by the end of the calendar year. |
July 26, 2011

**City of Del Mar**
Mayor Donald Mosier

<table>
<thead>
<tr>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1: On behalf of the Del Mar City Council, we would like to express our support of Option 2b as the RHNA Methodology and Allocation and encourage its adoption.</td>
<td>Comments noted.</td>
</tr>
</tbody>
</table>

Option 2b focuses on a plan for regional success, without harming any individual jurisdiction. This option allows all jurisdictions a reasonable ability to certify their housing elements. It will provide equal access to funding that will promote regional smart growth development, a key to implementing the goals of affordable housing. By addressing capacity, Option 2b fairly considers those jurisdictions with substantial open space, environmentally constrained lands, or built-out conditions. The likelihood that the region will actually provide the needed housing is increased with Option 2b, instead of continually being limited by capacity in the built-out cities.

We encourage the Board of Directors to endorse Option 2b because it creates a true regional approach to addressing the housing imbalance and allows those jurisdictions, like ourselves, to address the necessary change but not fail in producing a viable solution to housing.

Thank you for the opportunity to review and comment on the Draft Regional Housing Needs Assessment (RHNA) Methodology and Allocation. We appreciate Ms. Baldwin’s attendance at our April 11, 2011, City Council hearing and her willingness to answer our questions.
July 20, 2011

City of Escondido
Mayor Sam Abed

Comment

#1. Government Code Section 65584 (d) provides that the “regional housing needs allocation plan shall be consistent with all of the following objectives:

a) Increasing the housing supply and mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner and allocating very low and low income units in to all jurisdictions.

During the RHNA process each jurisdiction’s percentage of existing Target Households was identified, and the Regional Average was determined to be 40 percent (Table 4 from May 27, 2011 SANDAG agenda). The jurisdictions’ existing percentage of Target Households ranges from 21 percent (Poway) to 61 percent (National City). Eleven of the 19 jurisdictions in the region currently have a percentage of Target Households at or below the Regional Average. Escondido’s existing percentage of Target Households is 44 percent, which exceeds the Regional Average. The Draft RHNA Methodology allocates 1,833 Target Households to Escondido which exceeds the Regional Average by 180 units. Escondido strongly opposes this allocation methodology and firmly believes allocations should equitably distribute Target Households in a manner that more closely aligns each jurisdiction’s percentage of Target Households with the regional average. Under this approach Escondido’s equitable Target Household allocation would be 1,653 units.

Response

a) The foundation of RHNA Option 2b is the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast.

The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS. Over 80 percent of the new housing built in the region will be multifamily.

Table 4 in Appendix D of the RHNA Plan shows the percent of lower income housing allocated to each jurisdiction as well as the percentage of lower income households residing in each. Although the regional percentage of lower income households is 40 percent, jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households.

The following points summarize how the Draft RHNA Methodology and Allocation Option 2b addresses overconcentration.

• In the Draft RHNA Methodology and Allocation Option 2, all jurisdictions but four (Carlsbad, Poway, County of San Diego unincorporated area, and Del Mar) received a lower income RHNA allocation of 44 percent, within the range of the 40 percent regional average.
• Carlsbad received a lower income RHNA allocation of 32 percent in comparison to its 27 percent of lower income households, and Poway received a lower income RHNA allocation of 28 percent in comparison to its 21 percent of lower income households. The lower income RHNA allocations for both move them toward the regional average of 40 percent.
• The County of San Diego unincorporated area received a lower income RHNA allocation of 16 percent (compared to its lower income household percentage of 34 percent) in recognition of its rural nature and lack of urban infrastructure,
City of Escondido (continued)

and Del Mar received a lower income RHNA allocation of 20 percent (compared to its lower income household percentage of 25 percent) primarily because of its small size of slightly more than 4,000 residents.

- The four jurisdictions with a proportion of lower income households that exceeds the regional average by more than 5 points and are therefore considered to have an overconcentration of lower income households (El Cajon - 53 percent, Imperial Beach - 52 percent, Lemon Grove - 47 percent, and National City - 61 percent) received lower income RHNA allocations of 44 percent, which moves these jurisdictions in the direction of the regional average.

- It allocates RHNA numbers in all four income categories to all 19 of the region’s jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.

b) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.

c) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category as compared to the regional distribution.

Escondido believes there is a socioeconomic equity issue with regard to the proposed allocation of Escondido's Target Household units in light of the City's current conditions. The Draft Methodology proportionately allocates fewer Target Household units to more affluent cities that already contain significantly fewer Target Households than the regional average. SANDAG has reported that Escondido maintains the lowest median income of all San Diego North County cities ($56,259) based on 2010 Census information. This income level is significantly less than the regional average of $62,771 and only slightly more than one-half of the top-ranked city's median income. A goal of Escondido’s General Plan Update that is currently underway is to improve the city's current jobs/housing balance and raise median income levels. While Escondido recognizes the importance of providing opportunities for Target Households, obligating the city to provide more than

b) and c) Option 2b utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and to the horizon year of the 2050 RTP/SCS. Over 80 percent of new housing is projected to be multifamily.

- In the Draft RHNA Methodology and Allocation Option 2, all jurisdictions but four (Carlsbad, Poway, County of San Diego unincorporated area, and Del Mar) received a lower income housing allocation of 44 percent, within the range of the 40 percent regional average. Escondido’s percentage of lower income households based on the U.S. Census is 44 percent; Escondido’s allocation of lower income RHNA housing units is the same as its current share of lower income households.

Based on state law, jurisdictions must identify adequate sites for multifamily housing to meet their lower income RHNA allocation. The degree to which these units will be built as lower income housing will depend on local jurisdiction housing element programs and local, state, and federal funds that are used to build affordable lower income housing. Therefore, the RHNA does not increase lower income housing impacts in a disproportionate manner.
City of Escondido (continued)

the regional average exacerbates efforts of raising the community’s median income by further amplifying socioeconomic inequity in the community.

d) Promoting an improved intraregional relationship between jobs and housing.

Escondido currently maintains only 3.4 percent of its land area for employment purposes based on SANDAG’s 2009 Employment and Residential Lands Inventory. This is less than the regional average of 3.9 percent and significantly less than all San Diego North County communities which range from 5.1 percent (Poway) to 22.9 percent (Carlsbad). This has resulted in a significant out-migration of commuters from Escondido to employment areas in other jurisdictions. The proposed RHNA methodology degrades the intraregional relationship between jobs and housing by allocating a disproportionate share of Target Households to Escondido rather than to jurisdictions that can provide employment opportunities in closer proximity to housing, thus reducing commuting patterns.

In preparing the various RHNA options, SANDAG staff analyzed the 20 dwelling units per acre (du/ac) or greater housing capacity of all local jurisdictions in the San Diego region. This analysis was used to generally determine each jurisdictions’ ability (based on their general plan land use designations, not zoning) to identify sites for lower income housing when preparing their housing elements. State law uses a default density of 30 du/ac as a proxy for very low and low income housing. Determining and using the 20+ du/ac capacity in Option 2b instead of 30+ du/ac capacity ensures its compliance with this section of state law. Option 2b does not ensure that any jurisdiction (including those with “excess” capacity) will be exempt from rezoning to meet the site identification requirements of state law.

#2: Overall, the Draft Methodology appears to reward more affluent jurisdictions that have adopted General Plans with more restrictive land use designations (i.e. less residential capacity) by allocating them a lower number of Target Household units. The RHNA Fact sheet states that the “allocation proposal is based on estimated existing plan capacity, or regional allocation, whichever is lower in jurisdictions where estimated existing plan capacity is exceeded.” Escondido strongly opposes this methodology and feels that jurisdictions should not be allocated fewer units simply because their General Plans do not currently accommodate growth. The State Department of Housing and Community Development does not accept this approach in certifying Housing Elements and will require that agencies amend their General Plan to accommodate additional units. The City is willing to accept up to 1,653 Target Household units, which is consistent with the regional
**City of Escondido (continued)**

However, Escondido should **not** be required to accommodate more Target Household units than the regional average simply because other jurisdictions’ General Plans currently do not have capacity, or do not choose to amend their General Plan policies to increase capacity.

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**July 6, 2011**

**City of Lemon Grove**
Mayor Mary Sessom

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<tr>
<th>Comment</th>
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<tbody>
<tr>
<td>#1: The comments communicated in this letter should also extend to the related documents (RTP, SCS, and EIR).</td>
<td>Comment noted. These documents were prepared together and are based on the 2050 Regional Growth Forecast, which serves as the foundation of the 2050 RTP and its SCS land use pattern and Draft RHNA Methodology and Allocation.</td>
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</table>
| #2: SB 375 requires SANDAG to integrate the preparation of the RTP with the RHNA and the SCS with the goal of ensuring a mix of housing types and affordability, thus providing workers of all income levels with opportunities to live close to work or utilize transit. | SANDAG integrated the preparation of the RTP/SCS and RHNA in several ways.  
  - Both planning documents were prepared during the same time frame, and were based on the land use pattern contained in the 2050 Regional Growth Forecast.  
  - The 2050 Forecast includes land uses and densities based on local jurisdiction existing plans and policies during the 11-year RHNA projection period.  
  - The forecast was used to help determine the transportation network for the RTP, and the RTP transit network provides new transit services that provide more transit access for many people in the region.  
  - The forecast shows that the number of housing units and jobs within a half-mile of transit nearly doubles between 2008 and 2050, thus providing workers of all income levels with opportunities to live close to work or to utilize transit.  
  - The forecast and 2050 RTP/SCS also shows that the San Diego region is planning for compact, higher density development located near transit and within the already urbanized areas of the region.  
  - More than 80 percent of the projected new housing in the region will be higher density.  
  - Seventy-nine percent of all housing and 86 percent of all jobs will be located in the areas where the greatest investments in public transit are being made (within the Urban Area Transit Strategy Area). |
City of Lemon Grove (continued)

#8: The four RHNA objectives from Housing Element Law are: affordability of housing; infill development and socioeconomic equity; jobs/housing balance; & balanced communities. The City of Lemon Grove does not believe that the current option being circulated for public comment, Option 2b, meets the requirements of SB 375 or the RHNA objectives.

State law RHNA objectives:
- Increasing the housing supply and mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner and allocating very low and low income units in to all jurisdictions.
- Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.
- Promoting an improved intraregional relationship between jobs and housing.
- Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category as compared to the regional distribution.

Option 2b meets the RHNA objectives in state law and the requirements of SB 375 as follows:
- It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.
- It utilizes the forecasted pattern of development from the 2050 Regional Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS. Over 80 percent of the new housing built in the region will be multifamily.
- It promotes an intraregional relationship between jobs and housing, because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.
- It also moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b moves most jurisdictions closer to the regional percentage of lower income households with the exception of Del Mar and the unincorporated area of San Diego County. The small size of Del Mar and the rural nature and lack of infrastructure in most of the unincorporated area of the County resulted in RHNA allocations with a lower percentage of lower income housing than the regional percentage of lower income households.
- The four jurisdictions with a proportion of lower income households that exceeds the regional average by more than 5 points and are therefore considered to have an overconcentration of lower income households (El Cajon - 53 percent, Imperial Beach - 52 percent, Lemon Grove - 47 percent, and...
City of Lemon Grove (continued)

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<th>National City - 61 percent) received lower income RHNA allocations of 44 percent, which moves these jurisdictions in the direction of the regional average.</th>
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#4: Option 2b raises the following questions:
How does the RHNA allocation outlined in Option 2b affect the Social Equity Goal of the RTP and the socioeconomic goal of Housing Element Law? The communities of concerns (low income, minority populations, low-mobility, low-community engagement) are mapped in the RTP and transit improvements are recommended to serve these populations. RHNA Option 2b appears to allocate increased low income populations (one of the four communities of concern) to areas that already exceed the regional average.

The social equity goals of the 2050 RTP/SCS and RHNA complement one another.
- The 2050 RTP/SCS social equity goal is stated as follows: The transportation system should be designed to provide an equitable level of transportation services to all segments of the population.
- The RHNA objectives state that we should be: Promoting infill development and socioeconomic equity; and Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category as compared to the regional distribution.

The RTP provides transportation access to communities of concern and the RHNA allocates lower income housing needs (based 20 or greater du/ac) using the 2050 Regional Growth Forecast. The forecast is based on local jurisdiction plans and policies and as stated above, the land use pattern shows that most housing and jobs in the region will be located within a half-mile of transit and on non-vacant land (redevelopment and infill sites). The RHNA housing allocation is based on local jurisdiction plans and policies, which have changed in recent years to increase multifamily housing capacity and to locate higher density housing near transit.

#5: Does the Option 2b RHNA allocation increase these disproportionate impacts even more because of the increase in the low income population? If so, then Option 2b is contrary to RTP policy.

The RHNA allocates housing in four income categories. Based on state law, jurisdictions must identify adequate sites for multifamily housing to meet their lower income RHNA allocation. The degree to which these units are built as lower income housing will depend on local jurisdiction housing element programs and local, state, and federal funds that are used to finance affordable lower income housing. Therefore, the RHNA does not increase the impacts of lower income housing in a disproportionate manner.

#6: How would an incentive policy offset those impacts?

An incentive policy like Policy 33 can provide assistance to jurisdictions that plan for and build affordable housing by improving their scores for the SANDAG TransNet Smart Growth Incentive Program grants for capital and planning projects in Smart Growth Opportunity Areas and for the TransNet/Transportation Development Act Active Transportation Program funds.
City of Lemon Grove (continued)

**#7:** If an incentive policy is to be implemented to offset the impacts of Option 2b for the RHNA allocation formula, then when will it happen? Policy 33 should be under discussion concurrently with the RHNA discussion and not after its adoption. Such a policy that incentivizes a community with a disproportionate community of concern to take more than other communities seems to be contrary to the RTP goals. However, it would be the foundation for giving assurances to those jurisdictions taking more than their “fair share” of very low and low income housing allocations, that there will be funds available to meet the RHNA numbers.

**#8:** How could Option 2b have been addressed in the RTP/SCS EIR (E-J-2) when Option 2b was selected just prior to the release of a 1,400 page EIR?

The 2050 RTP/SCS land use pattern analyzed in the 2050 RTP/SCS EIR and RHNA Option 2b include the same housing density and location assumptions that are contained in the 2050 Regional Growth Forecast. (The RHNA is not subject to the California Environmental Quality Act.)

**#9:** Would Option 2b require those jurisdictions taking more than their “fair share” to make significant investments to improve the performance measures for those populations (average travel time, job access, access to transit, and access to amenities such as schools, airport, healthcare, parks and beaches? How will the quality of those amenities such as high performing schools be measured?

Option 2b is based on local jurisdiction general plans and therefore would not require jurisdictions to make significant investments beyond what they are currently planning. The 2050 RTP/SCS shows that the performance measures for communities of concern do not differ from the rest of the region.

**#10:** The selection of Option 2b provides only a “close” standard to the goals of Housing Element Law that it “moves the county in the right direction” whereas Option 3c clearly meets all four goals of the Housing Element Law and SB 375 as reflected in the RTP and SC. Any option that creates inequitable housing distribution fails to meet Housing Element Law and generates flaws in the region’s planning documents.

All of the RHNA options that were considered during the preparation of the Draft RHNA Methodology and Allocation meet the objectives of state housing element law, and are consistent with the 2050 RTP and its SCS.
September 1, 2011

City of National City
Brad Raulston, Executive Director City of National City Community Development

Comment

#1: National City has the greatest proportion of lower income households among SANDAG’s 19 member agencies. Based on the 2000 Census, 61 percent of the City’s households were lower income compared to the regional average of 40 percent. Yet the draft plan allocates a greater share of 44 percent lower income housing units to the City than the regional average of lower income households.

The Draft RHNA Plan does not achieve several of the State Housing Element Law’s objectives including (paraphrased): 1) Planning for housing affordability in an equitable manner among the cities and county within the region; 2) Promoting socioeconomic equity; and 3) Allocating a lower proportion of lower income units when a jurisdiction has a disproportionately higher share of the countywide average of lower income households.

The proposed allocation to the City does not further the objectives of State Housing Law and would further exacerbate the overconcentration of lower income households in the City. Moreover, the proposed plan would continue to perpetuate the regional inequity between more affluent and less affluent communities by not addressing the existing distribution of lower income households in the region when allocating RHNA numbers.

To be minimally consistent with State Housing Law, a community with a greater proportion of lower income households than the regional average should be allocated a percentage of lower income units that is less than this regional average. To be consistent with the intent and spirit of the law, the allocation should reflect a substantial effort to achieve the objectives stated above.

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<td>RHNA Option 2b moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b allocates 44 percent of National City’s RHNA units to the lower income categories thus moving the city toward the regional average of 40 percent, which is a significant shift from its current percentage of lower income households of 61 percent. The other jurisdictions with an overconcentration of lower income households — El Cajon, Imperial Beach, and Lemon Grove — also are allocated 44 percent of their RHNA units to the lower income categories.</td>
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City of National City (continued)

#2: Another concern is Board Policy 33. The purpose of Policy 33 is penalized in relation to cities unwilling to plan for growth that, as a result, receive lower RHNA allocations. Lower RHNA allocations improve production results due to the percentage methodology used to determine funding priorities. Because of this contradiction we have concerns about any proposed resolution. We ask that you consider this concern and allow us to have a seat at the table in the committee discussions that are ongoing so we can help form a resolution that matches the goals and needs of our community and the region.

The Board Ad Hoc Subcommittee on Policy 33 has met twice since it was appointed. The City of Chula Vista proposed amendments to Policy 33, which have been discussed by the Subcommittee and referred to the planning directors for review based on their technical expertise. The work on Policy 33 is expected to be completed within two months of the scheduled date to adopt the 2050 RTP/SCS and RHNA. The Subcommittee is considering ways to allocate Smart Growth Incentive Program and Active Transportation Program funds that link these funds to housing element compliance and the production of lower income housing. Several ways to evaluate the production of lower income housing are under consideration. The South County subregion is represented on the Subcommittee by Chula Vista Mayor Cheryl Cox.

July 27, 2011

City of Oceanside
Mayor Jim Wood

Comment

#1: As previously expressed by Planning Division staff in public meetings of the Regional Planning Board (RPC) in April and May of this year, the City of Oceanside has serious concerns about the fairness and legality of the RHNA allocation method distributed for public review. We agree with the City of Escondido and other SANDAG members that have formally opined that the San Diego region cannot move forward with an allocation method that rewards those jurisdictions that have created the most restrictive conditions for affordable housing while penalizing those jurisdictions that have done the most to accommodate it. We believe that such an approach is contrary to state law, manifestly unfair to several jurisdictions, and harmful to the San Diego region's economic and environmental sustainability.

Comment noted. As stated in the RHNA reports, SANDAG believes that all of the RHNA options discussed by the Regional Planning Technical Working Group (TWG), Regional Planning Committee (RPC), and Board of Directors are consistent with the objectives of state law and with the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS).

Option 2b meets the RHNA objectives in state law and the requirements of SB 375 as follows:

- It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.
- It utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS.
### City of Oceanside (continued)

Over 80 percent of the new housing built in the region will be multifamily.
- It promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.
- It also moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b moves most jurisdictions closer to the regional percentage of lower income households with the exception of Del Mar and the unincorporated area of San Diego County. The small size of Del Mar and the rural nature and lack of infrastructure in most of the unincorporated area resulted in RHNA allocations with a lower percentage of lower income housing than the regional percentage of lower income households.

### #2: The City continues to advocate for a more principled and regionally-beneficial allocation method, akin to those options favored by a majority of the planning and housing professionals who comprise the Regional Housing Working Group (RHWG).

Convening over a 10-month period, the RHWG worked closely with SANDAG staff to develop allocation options that not only accord with state housing law but also with the San Diego region’s commitment to smart growth, socio-economic balance and environmental sustainability, as expressed in the Regional Comprehensive Plan and carried out through associated policies and programs like the Smart Growth Concept Map, the Climate SANDAG integrated the preparation of the 2050 RTP/SCS and RHNA in several ways. RHNA Option 2b supports the region’s commitment to smart growth, socio-economic balance and environmental sustainability as expressed in the RCP as described below.

- Both planning documents were prepared during the same time frame, and were based on the land use pattern contained in the 2050 Regional Growth Forecast.
- The 2050 Forecast includes land uses and densities based on local jurisdiction existing plans and policies during the 11 year RHNA projection period.
- The forecast was used to help determine the transportation network for the RTP, and the RTP transit network provides new transit services that provide more transit access for many people in the region
City of Oceanside (continued)

Action Strategy and the Sustainable Communities Strategy. We remain hopeful that SANDAG’s member jurisdictions will reconsider the extent to which the Board-accepted RHNA allocation method is inconsistent with state and regional planning goals, and, in turn, recommit themselves to a more appropriate approach to distributing the region’s affordable housing obligation.

- The forecast shows that the number of housing units and jobs within a half-mile of transit nearly doubles between 2008 and 2050, thus providing workers of all income levels with opportunities to live close to work or to utilize transit.
- The forecast and 2050 RTP/SCS also shows that the San Diego region is planning for compact, higher density development located near transit and within the already urbanized areas of the region.
- More than 80 percent of the projected new housing in the region will be higher density.
- Seventy-nine percent of all housing and 86 percent of all jobs will be located in the areas where the greatest investments in public transit are being made (within the Urban Area Transit Strategy Area).

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<th>#3: State Law</th>
<th>Please see response to Comment #1 above.</th>
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<td>In our collective effort to equitably share responsibility for accommodating nearly 162,000 new housing units over the next decade, the nineteen jurisdictions that comprise the San Diego region receive considerable guidance from state law, as outlined in Government Code Section 65584, et. seq. State law is abundantly clear in requiring that councils of governments develop RHNA allocation methods that:</td>
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<td>• Promote infill development and socioeconomic equity, the protection of environmental and agricultural resources and the encouragement of efficient development patterns;</td>
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<td>• Improve the intraregional relationship between jobs and housing; and</td>
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<td>• Alleviate the overconcentration of lower-income households in jurisdictions that already accommodate a disproportionately high share of such households.</td>
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<th>#4: Furthermore, state law requires that allocation methods consider &quot;opportunities to maximize the use of public transportation and existing transportation infrastructure&quot; (Govt. Code Section 65584.04(d)(3)). Consistent with this state requirement, the RHWG developed allocation methods that factor in the transit orientation of each jurisdiction (Options 3c and 3d). As indicated by our strong support of Options 3c and 3d, the City of Oceanside finds that adjusting the RHNA allocation method to account for transit orientation (as well as income distribution</th>
<th>All of the RHNA options considered the maximization of public transportation and existing transportation infrastructure. The foundation of RHNA Option 2b is the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast.</th>
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| City of Oceanside (continued) | The 2050 Regional Growth Forecast shows that the number of housing units and jobs within a half-mile of transit nearly doubles between 2008 and 2050 thus providing workers of all income levels with opportunities to live close to work or to utilize transit.

Also RHNA Option 2b promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans. |

| #5: With respect to RHNA allocation methods that privilege housing capacities as constrained by local general plans, state law is equally clear in prohibiting councils of governments from limiting their consideration of housing capacity to the existing zoning ordinances and land use restrictions of their member jurisdictions. Thus, SANDAG and its counterparts must consider the potential for increased residential development under alternative zoning and land use schemes. Notwithstanding such physical constraints as flood zones, farmland and sensitive habitat, state law clearly establishes that jurisdictions cannot justify reductions in their fair share of regional housing need on the basis of their failure to adequately zone for high-density housing (Govt. Code Section 65584.04(f)). Being rooted in just such an approach, Option 2b conforms neither to the spirit nor the letter of state law. | In preparing the various RHNA options, SANDAG staff analyzed the 20 du/ac or greater housing capacity of all local jurisdictions in the San Diego region. This analysis was used to generally determine each jurisdictions’ ability (based on their general plan land use designations, not zoning) to identify sites for lower income housing when preparing their housing elements. State law uses a default density of 30 du/ac as a proxy for very low and low income housing. Determining and using the 20+ du/ac capacity in Option 2b instead of 30+ du/ac capacity ensures its compliance with this section of state law. Option 2b does not ensure that any jurisdiction (including those with “excess” capacity) will be exempt from rezoning to meet the site identification requirements of state law. |

| #6: Housing “Capacity” In addition to its noncompliance with state law, Option 2b fails to acknowledge the ambiguous nature of general plan housing “capacity” and the common disconnect between what jurisdictions define as their respective housing capacities and what the California Department of Housing and Community Development (HCD) recognizes as “capacity” in the housing sites inventories that all jurisdictions must include in their updated housing elements. Housing sites inventories have become the single biggest obstacle to housing element certification in California, in large part because of the strict criteria HCD has established for inventoried sites. Consequently, many jurisdictions with general plan “capacity” for affordable housing find that they As noted above, RHNA Option 2b does not ensure that any jurisdiction will be exempt from rezoning to meet their lower income RHNA allocation. SANDAG is committed to working with HCD to simplify and increase the certainty of the site identification part of state law. We understand that this part of the law has been a challenge for local jurisdictions, and will work with HCD and the local jurisdictions to improve the process. The site identification issues identified in Oceanside’s letter will be shared with the TWG in preparing a report for use in our discussions with HCD. |
still have to rezone property to gain HCD approval of their sites
City of Oceanside (continued)

inventories. It is likely that some jurisdictions in the San Diego
region will confront a similar requirement in the course of
updating their housing elements for the 2013-2020 planning
period.

#7: Most of the remaining "capacity" for new housing in Oceanside
(affordable or market-rate) exists on small infill lots along the City's
already-developed commercial corridors: e.g. Coast Highway,
Oceanside Boulevard and Mission Avenue. Few of these lots are
vacant, and fewer still are large enough to accommodate the scale
of affordable housing development typically eligible for state and
federal subsidies. Convincing HCD that underutilized properties are
ripe for redevelopment will be a daunting challenge, particularly
given the current state of the local housing market. While
Oceanside's general plan "capacity" for affordable housing (at
densities of at least 20 du/acre) appears to exceed the City's RHNA
obligation under Option 2b, much of this "capacity" will not
qualify as suitable for affordable housing development under HCD
standards. Without a parcel-by-parcel analysis of affordable
housing capacity in each of the region's nineteen jurisdictions, it is
imprudent to assume that jurisdictions with theoretical general
plan "capacity" for high-density housing are any better prepared
to accommodate affordable housing than those with more limited
general plan "capacity."

The issue of "capacity" is further complicated by state density
bonus law and other local provisions that allow densities above
ostensible maximums set by general plans and zoning ordinances.
While state law mandates density bonuses of up to 35 percent
above locally-established density maximums, some jurisdictions
allow even greater bonuses through various mechanisms designed
to encourage affordable housing.

The fact is, although the state has established high density as a
proxy for housing affordability, many jurisdictions in San Diego

As noted above, SANDAG will work with HCD to consider changes to how non-vacant land, density bonus units, and the lower density zoned land are addressed in the housing element review process.
County have accommodated affordable housing at lower densities than those prescribed under RHNA protocol. We fully understand the challenge all jurisdictions face in dealing with minimum densities articulated by HCD as part of its evaluation of housing sites inventories, but we also believe that the RHNA allocation process must be informed by the reality of affordable housing development in our region - i.e., that affordability has been achieved across a range of densities, and through a variety of regulatory processes.

**#8: Jobs/Housing Ratio** Among incorporated jurisdictions in San Diego County, the City of Oceanside has the lowest ratio of jobs to housing units, supplying less than 0.7 jobs per residence. This jobs/housing ratio is less than half that of San Diego, Carlsbad, Vista and Poway. Consequently, much of the City's workforce is obliged to commute to job centers in San Diego, Carlsbad, Vista, the I-15 Corridor and southern Orange County. The cost of excessive commuting is not only borne by the commuters themselves, but by the entire region, in the form of increased traffic congestion and air pollution. The City's business community is also adversely impacted by this commuting pattern, with the purchasing power of local residents depleted by rising transportation costs.

RHNA Option 2b promotes an intraregional relationship between jobs and housing, because the 2050 Regional Growth Forecast (upon which it is based) distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.

**#9: The City of Oceanside is committed to creating more local jobs for residents at all income levels. This effort is challenging enough under current economic circumstances; it will be considerably more challenging if the City is forced to rezone a significant share of its already limited commercial and/or industrial land inventory to exclusively residential use.** The housing burden that Option 2b would place on Oceanside would compromise the City's efforts to build its employment base and create a more economically balanced and sustainable community. This consequence is implicitly acknowledged in Options 3c and 3d, which partially adjust RHNA shares based on the extent to which a jurisdiction's job/housing

| Jurisdictions that are required by HCD to rezone land to address their RHNA needs are not required to rezone employment land. They can rezone residential land at higher densities and/or for mixed use. |  |
### #10: Income Distribution

Income distribution in the City of Oceanside aligns precisely with the regional average; forty percent (40 percent) of households both in the City of Oceanside and across the San Diego region qualify as very low or low income. However, under Option 2b, Oceanside's allocation of very low and low income units accounts for forty-four percent (44 percent) of its total RHNA share. Other jurisdictions with percentages of very low and low income households currently at or above the regional average (San Diego, Chula Vista, San Marcos, Vista) also see their percentages go even higher under Option 2b.

If one of the principal goals of the RHNA process is to move the region toward a more balanced distribution of very low and low income households, how can it be appropriate to push a jurisdiction above the regional average, particularly if that jurisdiction has neither the employment base nor the transit infrastructure to accommodate these additional households? Such an approach undermines the principles of equity and sustainability that SANDAG and its member jurisdictions purport to follow in their regional planning efforts. Basic fairness requires that no jurisdiction with percentages of very low and low income households at or above the regional average be allocated very low and low income units in excess of this regional average.

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### #11: Recommendation

The City of Oceanside has consistently supported those allocation options that account for income distribution, jobs/housing balance and transit orientation, as well as those options that alleviate development pressure on the region's rural unincorporated areas by capping the County's

All of the RHNA options that were considered during the preparation of the Draft RHNA Methodology and Allocation meet the objectives of state housing element law, and are consistent with the 2050 RTP and its SCS.
City of Oceanside (continued)

allocation at its general plan capacity. We continue to find Option 3d to be the most principled and legally defensible of the allocation methods, and thus support its wholesale adoption. We believe that upon further review - including formal inquiries to state housing officials - SANDAG and its member jurisdictions must concede that Option 2b cannot be reconciled with state housing law and should therefore be abandoned in favor of a more reasoned and equitable approach.

July 28, 2011

City of Poway

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<tr>
<th>Comment</th>
<th>Response</th>
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<tr>
<td>#1: Thank you for the opportunity to comment on the Draft RHNA Methodology and Allocation for the upcoming housing element cycle. The City of Poway fully supports Option 2b: Lower Income Capacity Option, as proposed. This option is the only option that was considered that does not require a jurisdiction to exceed their lower income general plan capacities. The proposed Option 2b is equitable because it respects all jurisdictions' General Plans and does not force any jurisdiction to rezone in order to comply. The individual General Plans adopted at the local level are reflective of the jurisdictions' character and vision, and they serve as the basis for the Regional Comprehensive Plan (RCP) and Regional Transportation Plan (RTP). The distribution of the RHNA in Option 2b is consistent with the Smart Growth concepts in the RCP in that it places more affordable units in closer proximity to transit and away from habitat conservation areas. The units are assigned to the jurisdictions that have the capacity and the transportation infrastructure to accommodate them. The other options that were considered required three jurisdictions (Poway being one of them) to provide more affordable units than their adopted General Plans have provided for. This would create</td>
<td>Comments noted.</td>
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an inequity and puts those three jurisdictions at a significant
city of Poway (continued)

disadvantage of being able to achieve a certified Housing Element
within the timeframe dictated by HCD because only those
jurisdictions would be required to go through the additional steps
of rezoning and amending their General Plans to accommodate the
additional units. All other jurisdictions have the capacity (and
more) within their existing General Plans to provide the units
assigned. It should be noted that even with Option 2b, those three
jurisdictions would be required to provide 100 percent of their
higher density land as affordable housing, unlike any of the other
jurisdictions.

The City of Poway is pleased that Option 2b is the proposed
methodology and is fully supportive. This option truly is most
equitable and will result in a regional build out that is consistent
with the Smart Growth concepts of the RCP.

July 28, 2011

City of Santee

<table>
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<th>Comment</th>
<th>Response</th>
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| #1: The City appreciates the opportunity to comment on the
  proposed RHNA Methodology and Allocation of very low and low
  income housing units in the County and other jurisdictions in the
  region. The City does not oppose the allocation methodology
  reflected in Option 2b, which is based upon existing General Plan
  residential capacities by jurisdiction. | Comment noted. |
| #2: Option Tables - The option tables identify an estimated Santee
  General Plan 20+ du/acre housing capacity at 1,650 units. This
  number should be revised to reflect a 1,621 unit capacity to more
  accurately reflect the capacity of the City’s sole “Urban Residential
  (R-30)” site. The Urban Residential land use designation does not
  establish a density range but rather a single density based upon
  30 dwelling units per acre. When the actual site area and the
  existing density are considered, the result is a small (29 unit) | Comment noted and 20+ du/acre capacity changed from 1,650 to 1,621 units. As
  noted in Santee’s letter, this change does not change any of the RHNA allocation
  options, including Option 2b. |
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<tr>
<th>Reduction in the City’s 20+ du/acre residential capacity, from 1,650 City of Santee (continued) to 1,621 units. This minor change does not result in a change to the City’s Very Low/Low Income RHNA allocation in any of the options including Option 2b.</th>
<th>SANDAG is committed to working with HCD to simplify and increase the certainty of the site identification part of state law. We understand that this part of the law has been a challenge for local jurisdictions, and will work with HCD and the local jurisdictions to improve the process. The site identification issues identified in Santee’s letter will be shared with the TWG in preparing a report for use in our discussions with HCD.</th>
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<tr>
<td>#3: Housing Element Law - Crucial to each jurisdiction is the ability to demonstrate the existence of adequate capacity to accommodate its lower income RHNA allocations when preparing its 2013-2020 housing elements during the next two years. The City encourages HCD to accept infill sites in housing element inventories even when there are structures on these sites (i.e. non-vacant land sites). To ignore under-developed or under-utilized sites in urbanized areas is contrary to the goal of developing affordable housing closer to services and transit. Many cities partner with affordable housing developers to develop housing in appropriate infill locations and along transit-served corridors. These infill sites must be counted so that housing developers are presented with a wider range of site development options. Secondary dwelling units are constructed in all cities with ministerial review. Therefore, all single-family residential zones contribute affordable housing capacity and jurisdictions should be permitted to count these units toward meeting the very low and low RHNA numbers. State housing law defaults to an affordable housing density of 30 dwelling units per acre in identifying very low and low income RHNA sites. The City of Santee has, in partnership with affordable housing developers, constructed and will construct, affordable housing at 14 and 19 dwelling units per acre. As such, the City urges that the 30 dwelling units per acre default be reduced to at least 15 dwelling units per acre.</td>
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City of Santee (continued)

In addition, the City requests further analysis of density bonus law as it relates to capacity. Affordable housing developers almost always take advantage of density bonus provisions of state law as a means of ensuring the financial viability of their projects. Therefore density bonus should be taken into account when calculating capacity.

July 26, 2011

**Corking Pearling (by email)**

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<th>Comment</th>
<th>Response</th>
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<td>#1: National City is comprised of ~40 percent very low income households and ~22 percent low income households. The region is comprised of ~22 percent very low and ~17 percent low income households. Yet, the RPC/Staff have recommended that National City receive a RHNA allocation equivalent to ~25 percent very low and ~19 percent low of their regional share, which will further contribute to the extreme lower income impaction in National City and socioeconomic inequity in the region. The RHNA methodology and allocation [Option 2b] is not consistent with State Housing Element Law, and its outcome is patently unfair to lower income communities such as National City, which has the lowest household income in the region.</td>
<td>As stated in the RHNA reports, SANDAG believes that all of the RHNA options discussed by the TWG, Regional Housing Working Group (RHWG), RPC, and Board of Directors are consistent with the objectives of state law and with the 2050 Regional Transportation Plan and its Sustainable Communities Strategy.</td>
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Pursuant to Government Code Section 65584, the regional housing needs allocation plan must be consistent with:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low and very low income households.

Comment: The proposed allocation methodology has inequity built into it since the allocation of lower income units to an impacted community will always be a factor greater than the regional proportion, i.e. the equation moves the allocation slightly closer to

Option 2b meets the RHNA objectives in state law and the requirements of SB 375 as follows:

1. It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region. State law does not require an allocation methodology that ultimately results in mathematical equity. RHNA Methodology and Allocation Option 2b allocates a lower percentage of lower income housing units to jurisdictions with an overconcentration of lower income households. The four jurisdictions with a proportion of lower income households that exceeds the regional average by more than 5 percentage points and are therefore considered to have an overconcentration of lower income households (El Cajon at 53 percent,
### Responses to Comments on Draft RHNA Methodology and Allocation – October 28, 2011

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<tr>
<th>Corking Pearling (by email) (continued)</th>
<th>Imperial Beach at 52 percent, Lemon Grove at 47 percent, and National City at 61 percent) received lower income RHNA allocations of 44 percent, which moves these jurisdictions in the direction of the regional average.</th>
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<td>the regional average, but will never mathematically achieve equity. Hence, the proposed plan is not consistent with this objective of state housing law.</td>
<td>(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns. Comment: The proposed allocation plan promotes socioeconomic inequity more so than equity by allocating a greater proportion of lower income households than the existing regional proportion to impacted communities, i.e. If the regional proportion of very low income households is ~22 percent, an allocation of ~25 percent to National City (with a current proportion of 40 percent) does not promote socioeconomic equity. The proposed plan is not consistent with this objective of state housing law.</td>
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<td>(2) RHNA Option 2b utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS. Over 80 percent of the new housing built in the region will be multifamily.</td>
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<td>(4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent decennial United States census. Comment: The proposed plan does not allocate a lower proportion of lower income units compared to the countywide distribution. For example, National City with a disproportionately high share of lower income households (~40 percent) is allocated a proportion of ~25 percent lower income units. The countywide distribution of lower income households is ~22 percent. National City’s allocation proportion of ~25 percent is greater and not lower than the countywide distribution of ~22 percent. Consequently, the proposed plan is not consistent with this objective of state housing law.</td>
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<td>These inconsistencies with state housing law can be remedied by allocating a lower proportion of lower income units than the</td>
<td>(4) RHNA Option 2b also moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b moves most jurisdictions closer to the regional percentage of lower income households with the exception of Del Mar and the unincorporated area of San Diego County. The small size of Del Mar and the rural nature and lack of infrastructure in most of the unincorporated area resulted in RHNA allocations with a lower percentage of lower income housing than the regional percentage of lower income households.</td>
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Responses to Comments on Draft RHNA Methodology and Allocation – October 28, 2011

Regional distribution to those communities that have a higher proportion of lower income households than the region. Otherwise, adoption of the plan as proposed would contribute to perpetuating lower income impaction and socioeconomic inequity in the region.

July 28, 2011

San Diego Housing Federation

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<tr>
<td>#1: At its May 27 meeting, the SANDAG Board of Directors recommended Alternative 2b for the Regional Housing Needs Assessment (“RHNA”). The San Diego Housing Federation feels strongly that this allocation methodology fails to make meaningful progress towards achieving the public policy objectives set forth in Housing Element Law and SB 375.</td>
<td>The 2050 RTP/SCS and RHNA documents were prepared together and are based on the 2050 Regional Growth Forecast, which serves as the foundation of the SCS land use pattern and Draft RHNA Methodology and Allocation. SANDAG integrated the preparation of the 2050 RTP/SCS and RHNA to make meaningful progress towards meeting the public policy objectives in housing element law and SB 375 in several ways: • Both planning documents were prepared during the same time frame, and were based on the land use pattern contained in the 2050 Regional Growth Forecast. • The 2050 Forecast includes land uses and densities based on local jurisdiction existing plans and policies during the 11-year RHNA projection period. • The forecast was used to help determine the transportation network for the 2050 RTP, and the RTP transit network provides new transit services that provide more transit access for many people in the region. • The forecast shows that the number of housing units and jobs within a half-mile of transit nearly doubles between 2008 and 2050, thus providing workers of all income levels with opportunities to live close to work or to utilize transit. • The forecast and 2050 RTP/SCS also shows that the San Diego region is planning for compact, higher density development located near transit and within the already urbanized areas of the region. • More than 80 percent of the projected new housing in the region will be higher density.</td>
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Explicit in these laws is an acknowledgement that their goals, including deconcentration of poverty, increased jobs-housing balance, and sustainable land use patterns, are best achieved by utilizing a regional lens. By choosing Alternative 2b, SANDAG has failed to apply this lens. By relying upon a distribution methodology based solely upon HCD income distribution percentages, the region will continue to perpetuate and worsen illogical and unhealthy traffic patterns and contribute to deeper socioeconomic inequities in the region. Furthermore, allowing individual jurisdictions to independently determine whether they have sufficient capacity to accommodate affordable housing runs absolutely counter to the fundamental principles of Housing Element law.
San Diego Housing Federation (continued)

- Seventy-nine percent of all housing and 86 percent of all jobs will be located in the areas where the greatest investments in public transit are being made (within the Urban Area Transit Strategy Area).

In preparing the various RHNA options, SANDAG staff analyzed the 20 du/ac or greater housing capacity of all local jurisdictions in the San Diego region. This analysis was used to generally determine each jurisdictions’ ability (based on their general plan land use designations, not zoning) to identify sites for lower income housing when preparing their housing elements. State law uses a default density of 30 du/ac as a proxy for very low and low income housing. Determining and using the 20+ du/ac capacity in Option 2b instead of 30+ du/ac capacity ensures its compliance with this section of state law. Option 2b does not ensure that any jurisdiction (including those with “excess” capacity) will be exempt from rezoning to meet the site identification requirements of state law.

#2: During the Board’s deliberations, one Board member questioned how the RHNA methodology might differ given a different decision-making body that did not have a jurisdictional stake in the outcome. The action of SANDAG’s Regional Housing Working Group on April 14, 2011 is instructive in addressing this inquiry. The Regional Housing Working Group is primarily comprised of organizational interests that serve the entire San Diego region without regard to jurisdictional boundaries. The RHWG members present on that date unanimously agreed that Alternative 3c was the best methodology for allocation of lower income housing. The significance of this vote may be heightened by the fact that participants represented groups with broadly divergent interests, including the San Diego Housing Federation, the San Diego Regional Chamber of Commerce, and Affordable Housing Advocates.

The unanimous support shown by the RHWG members for Alternative 3c is a recognition that its methodology: 1) is more consistent with and builds upon the goals set forth in the current Regional Comprehensive Plan, and 2) maximizes the intent of housing element law by fully applying the objectives set forth under the law; and 3) is integral to ensuring the implementation

All of the RHNA options that were considered during the preparation of the Draft RHNA Methodology and Allocation meet the objectives of state housing element law, and are consistent with the 2050 RTP and its SCS. Option 2b meets the RHNA objectives in state law and the requirements of SB 375 as follows:

- It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.
- It utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS. Over 80 percent of the new housing built in the region will be multifamily.
- It promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.
- It also moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions
of a successful Sustainable Communities Strategy under SB 375. For these reasons, the San Diego Housing Federation remains committed to its recommendation that Alternative 3c is far superior to the methodology represented in Alternative 2b. San Diego Housing Federation (continued)

with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b moves most jurisdictions closer to the regional percentage of lower income households with the exception of Del Mar and the unincorporated area of San Diego County. The small size of Del Mar and the rural nature and lack of infrastructure in most of the unincorporated area resulted in RHNA allocations with a lower percentage of lower income housing than the regional percentage of lower income households.

#3: In light of the Board’s current recommendation of Alternative 2b, it is all the more imperative that a strong program of incentives be established that provides financial support for jurisdictions that have a commitment to providing much needed housing for the region’s workforce and other low income households. We applaud the Board for moving the discussion of Policy 33 forward concurrently with the RHNA adoption. We will be providing separate input into this process as the discussion progresses. However, needless to say, it is critical that the policy be strengthened.

The Board Ad Hoc Subcommittee on Policy 33 has met twice since it was appointed by the Board of Directors. The Subcommittee is considering amendments to Policy 33, and has referred proposed revisions to the planning directors for review based on their technical expertise. The work on Policy 33 is expected to be completed shortly after the scheduled date to adopt the 2050 RTP/SCS and RHNA. The Subcommittee is considering ways to allocate Smart Growth Incentive Program and Active Transportation Program funds that link these funds to housing element compliance and the production of lower income housing. Several ways to evaluate the production of lower income housing are under consideration.

May 23, 2011

San Diego Housing Federation

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| #1: On Friday, May 27, the SANDAG Board of Directors will make a recommendation on the Regional Housing Needs Assessment (“RHNA”). As you are aware, this cycle’s RHNA allocation is not just germane to the region’s housing needs. Pursuant to SB375, this allocation is also critical to the adoption and implementation of San Diego’s Regional Transportation Plan and Sustainable Communities Strategy. | Comments noted. SANDAG recognizes the importance of integrating the 2050 RTP/SCS and RHNA as a way of strengthening the connections between transportation, housing, and other land uses. SANDAG integrated the preparation of the 2050 RTP/SCS and RHNA to make meaningful progress toward meeting the public policy objectives in housing element law and SB 375 in several ways:  
- Both planning documents were prepared during the same time frame, and were based on the land use pattern contained in the 2050 Regional Growth Forecast. |
San Diego Housing Federation (continued)

SB 375 provides the region with an opportunity to plan outside the “silos” by strengthening the connections between transportation, housing and other land uses. Recognizing that each jurisdiction’s individual decision-making has a collective and cumulative impact on the region as a whole, strengthening these connections will provide incalculable economic and social benefits to all the affected jurisdictions by:

1) Decreasing regional and intra-jurisdictional traffic by increasing jobs housing balance. This will lead to increased worker productivity and increased highway capacity for commercial goods movement.

2) Creating more compact development patterns that will result in more financially and environmentally sustainable communities. This will allow jurisdictions to maximize their investment in public infrastructure and services in a smaller geographic area, allowing their dollars to go much further. In addition, jurisdictions can experience increased tax-generated revenues from the economic development that is generated by well-planned transit-oriented development.

3) Realizing the maximum value from our regional investment in transportation infrastructure by giving commuters true alternatives to utilizing single occupancy vehicles. In doing so, freeway capacity can be increased without adding additional lanes.

#2: In order to maximize the benefits that SB375 offers, we encourage you to reject the staff’s recommendation of Scenario 2b, in favor of Option 3c. The latter scenario: 1) is more consistent with and builds upon the goals set forth in the current Regional Comprehensive Plan, and 2) maximizes the intent of housing element law by fully applying the objectives set forth under the law.

#2: In order to maximize the benefits that SB375 offers, we encourage you to reject the staff’s recommendation of Scenario 2b, in favor of Option 3c. The latter scenario: 1) is more consistent with and builds upon the goals set forth in the current Regional Comprehensive Plan, and 2) maximizes the intent of housing element law by fully applying the objectives set forth under the law.

- The 2050 Forecast includes land uses and densities based on local jurisdiction existing plans and policies during the 11-year RHNA projection period.
- The forecast was used to help determine the transportation network for the RTP, and the RTP transit network provides new transit services that provide more transit access for many people in the region.
- The forecast shows that the number of housing units and jobs within a half-mile of transit nearly doubles between 2008 and 2050, thus providing workers of all income levels with opportunities to live close to work or to utilize transit.
- The forecast and 2050 RTP/SCS also shows that the San Diego region is planning for compact, higher density development located near transit and within the already urbanized areas of the region.
- More than 80 percent of the projected new housing in the region will be higher density.
- Seventy-nine percent of all housing and 86 percent of all jobs will be located in the areas where the greatest investments in public transit are being made (within the Urban Area Transit Strategy Area).

All of the RHNA options that were considered during the preparation of the Draft RHNA Methodology and Allocation meet the objectives of state housing element law, and are consistent with the 2050 RTP and its SCS. Option 2b meets the RHNA objectives in state law and the requirements of SB 375 as follows:

- It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.
San Diego Housing Federation (continued)

- It utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS. Over 80 percent of the new housing built in the region will be multifamily.
- It promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.
- It also moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b moves most jurisdictions closer to the regional percentage of lower income households with the exception of Del Mar and the unincorporated area of San Diego County. The small size of Del Mar and the rural nature and lack of infrastructure in most of the unincorporated area resulted in RHNA allocations with a lower percentage of lower income housing than the regional percentage of lower income households.

#3: Integral to realizing the benefits afforded to the region by the implementation of SB375 is not just planning for housing in the “right” locations, but instead ensuring that the affordable housing is built. While SANDAG does not have the authority to regulate local land use, it does have the ability to incentivize development that is consistent with the goals of SB375 and our Regional Comprehensive Plan. We recommend that all competitively awarded funds, including Smart Growth Incentive Funds and TransNet Bicycle and Pedestrian Funds, be allocated in a way that

The Board Ad Hoc Subcommittee on Policy 33 has met twice to consider amendments to Policy 33. The SDHF comments pertaining to Policy 33 will be considered by the subcommittee.
San Diego Housing Federation (continued)

acknowledges jurisdictions’ efforts to achieve regional goals for jobs-housing balance.

SANDAG should ensure that the criteria for allocation of these funds include: 1) a requirement that all developments supported by the funds include an affordable housing component; 2) give strong priority for jurisdictions taking more than their “fair share” of affordable housing under the RHNA process; and 3) gives preference for providing funding to governmental or public-private partnerships which result in the acquisition of land for affordable housing development adjacent to major transit nodes concurrent with the acquisition of transit right of way.

Through our recent planning efforts, SANDAG and its member jurisdictions have laid a strong foundation for making the critical connections called for in SB 375. We hope that you will continue this progress by adopting Option 3c today and directing the implementation of funding allocation criteria that support the implementation of the goals of SB 375.

Comment noted.

July 29, 2011

**Sustainable San Diego**

<table>
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<th>Comment</th>
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| #1: The importance of assessing and “allocating” where a region’s housing mix will be planned and presumably produced is based on the linkage between where people live and where they must travel - to work, to obtain the basic necessities of life, to recreate and to contribute to the life of the community. It is this linkage and its daily impact upon economic health and job opportunity, the need to reduce commutes in congested roadways over significant distances, to improve access to transit, and improve air quality which forms the basis for the mandate that such need projections be assessed regionally and not parochially. Indeed, these linkages are the basis for the requirements reflected in SB 375 and the need | All of the RHNA options that were considered during the preparation of the Draft RHNA Methodology and Allocation meet the objectives of state housing element law, and are consistent with the 2050 RTP and its SCS, as well as the RCP. Option 2b meets the RHNA objectives in state law and the requirements of SB 375 as follows:  
- It allocates RHNA numbers in all four income categories to each of the region’s 19 jurisdictions, thus addressing the objective of promoting socioeconomic equity throughout the region.  
- It utilizes the forecasted pattern of development from the 2050 Regional Growth Forecast, which incorporates policies in local plans that call for higher density housing to be concentrated in urbanized areas adjacent to transit and that protect environmental and agricultural resources, and demonstrates that |
to address sustainability and air quality through a housing-transportation link.

It is through this lens that Sustainable San Diego wishes to again restate our strong belief that the most appropriate methodologies are those which are the most consistent with SB 375 objectives, the Sustainable San Diego (continued)

principles in our Regional Comprehensive Plan, and best practices for achieving regional sustainability.

| #2: We acknowledge the decision by the Board at its May 27, 2011, meeting to circulate for public comment Lower Income Capacity Option 2b. However we also acknowledge the Board’s right to re-evaluate that choice, seek additional comment on this or other options, or reconsider prior to final adoption. While this would be our preferred outcome, we are restating our belief that other “Regional Share” methodologies would have been more consistent with regional sustainability principles as our primary comment with respect to option 2b. In addition, we would like to restate as well our belief that strong complimentary incentive policies such as Board Policy 33 will be even more important based upon the Board’s current direction. |
|
| the region’s local land use plans have significantly increased the region’s multifamily housing capacity since the 2030 Regional Growth Forecast. The 2050 Forecast accommodates the housing needs of all income levels during the next housing element cycle and out to the horizon year of the 2050 RTP and its SCS. Over 80 percent of the new housing built in the region will be multifamily.

- It promotes an intraregional relationship between jobs and housing because the 2050 Regional Growth Forecast distributes housing and employment growth at a jurisdiction level using a model that considers proximity to job centers, travel times, and commuting choices, as well as land use plans.
- It also moves the region toward improving the current distribution of lower income households in the region to reduce overconcentration. Jurisdictions with percentages of lower income households of plus or minus 5 percentage points of the 40 percent regional average (35 to 45 percent) are not considered to have an overconcentration of lower income households. Table 4 in Appendix D of the Draft RHNA Plan compares the RHNA very low and low income allocations considered during the RHNA process and the regional (40 percent) and jurisdiction percentages of existing lower income households based on the U.S. Census. The table shows that Option 2b moves most jurisdictions closer to the regional percentage of lower income households with the exception of Del Mar and the unincorporated area of San Diego County. The small size of Del Mar and the rural nature and lack of infrastructure in most of the unincorporated area resulted in RHNA allocations with a lower percentage of lower income housing than the regional percentage of lower income households. |
|
| Comments noted. SANDAG recognizes the importance of integrating the 2050 RTP/SCS and RHNA as a way of strengthening the connections between transportation, housing, and other land uses. SANDAG integrated the preparation of the 2050 RTP/SCS and RHNA to make meaningful progress toward meeting the public policy objectives in housing element law and SB 375 in several ways:
- Both planning documents were prepared during the same time frame, and were based on the land use pattern contained in the 2050 Regional Growth Forecast.
- The 2050 Forecast includes land uses and densities based on local jurisdiction existing plans and policies during the 11-year RHNA projection period. |
**Sustainable San Diego (continued)**

Sustainable San Diego is a collaborative of over thirty organizations dedicated to ensuring equal opportunity and access to a healthy region and communities by strengthening and integrating land use, housing, transportation, environment, health and economic development policies.

- The forecast was used to help determine the transportation network for the RTP, and the RTP transit network provides new transit services that provide more transit access for many people in the region.
- The forecast shows that the number of housing units and jobs within a half-mile of transit nearly doubles between 2008 and 2050, thus providing workers of all income levels with opportunities to live close to work or to utilize transit.
- The forecast and 2050 RTP/SCS also shows that the San Diego region is planning for compact, higher density development located near transit and within the already urbanized areas of the region.
- More than 80 percent of the projected new housing in the region will be higher density.
- Seventy-nine percent of all housing and 86 percent of all jobs will be located in the areas where the greatest investments in public transit are being made (within the Urban Area Transit Strategy Area).

**#3: The Lower Income Capacity Option which is the currently preferred option and the subject of this comment period is an unfortunate choice in that it fails to acknowledge the basic reality that increases in capacities region-wide must be better linked to job centers and job supporting populations. While respecting the preferences of local jurisdictions as reflected in their respective land use plans and the fact the state housing element law addresses itself to planning and not implementation is obvious, the purpose and advantage of a regional planning body is to seek and encourage the appropriate “big picture” best practices, and where appropriate, incentivize production.**

SANDAG staff perhaps unknowingly made the point with its description of the differing options and the basic two philosophies in conflict in its May 27, 2011 Agenda Report:

“These categories express two general philosophies: one that respects housing capacities in local general plans as reflected in the 2050 Regional Growth Forecast (Options 2b and 2c); and one that further improves the balance of housing for very low and low income households throughout the region based on planning principles that include income, jobs/housing balance and proximity.

The region’s increased residential capacity reflected in the 2050 Regional Growth Forecast, 2050 RTP/SCS land use pattern, and RHNA Methodology and Allocation Option 2b is located in areas with projected job growth and transportation facilities, including existing and future transit facilities. Local jurisdictions have been making changes to their local general and community plans to plan for multifamily housing and employment in areas that have and are planned to have transit service as shown in the 2050 RTP/SCS. These land use changes are consistent with and support the objectives of the RCP and its Smart Growth Concept Map. The Urban Area Transit Strategy study, the results of which are reflected in the 2050 RTP/SCS, resulted in the inclusion of new transit services to provide better connections between housing and employment in the future.
Sustainable San Diego (continued)

to transit (Options 1c, 3a, 3c, and 3d)” (Emphasis Added) (SANDAG Agenda Item No. 11-05-10, Page 1, May 27, 2011.)

While the overall data can be used to illustrate general compliance with state housing element law in terms of individual jurisdictions current and planned regional share of low and very low income housing, it also starkly illustrates a disconnect between where lower income populations reside and where they work. Examples include cities such as Chula Vista, El Cajon, Imperial Beach, Lemon Grove, National City and Oceanside. (Table 1a, SANDAG Agenda Item No. 11-05-10, May 27, 2011).

#4: In the absence of an allocation which further improves the balance of housing where planning is concerned, it is all the more important that SANDAG retain incentive policies such as Policy 33 which seek to encourage production.

The existence of a strong diversity of housing stock capable of sustaining a broad spectrum of our current and future workforce will focus our investment in more sustainable transportation networks, better link our workforce to the job growth sectors they support, reduce the disproportionate burden of high housing and transportation costs to a large segment of our workforce and positively impact productivity. Policy 33 does not unduly prejudice the award of discretionary funds for projects eligible through a competitive process, but simply acknowledges the reality that jurisdictions producing the majority of affordable housing product are indeed providing a regional benefit, and contributing to the types of higher-density, transit appropriate developments which will contribute to compliance with SB 375 and are consistent with our Regional Comprehensive Plan.

| The Board Ad Hoc Subcommittee on Policy 33 has met twice since it was appointed by the Board of Directors. The Subcommittee is considering amendments to Policy 33, and has referred proposed revisions to the planning directors for review based on their technical expertise. The work on Policy 33 will be completed within two months of October 28, the scheduled date to adopt the 2050 RTP/SCS and RHNA. The Subcommittee is considering ways to allocate Smart Growth Incentive Program and Active Transportation Program funds that link these funds to housing element compliance and the production of lower income housing. Several ways to evaluate the production of lower income housing are under consideration. The letter from Sustainable San Diego regarding Policy 33 (submitted at the July 22 Board meeting) will be considered by the Subcommittee. |
2010 REGIONAL TRANSPORTATION IMPROVEMENT PROGRAM AMENDMENT NO. 13 AND AIR QUALITY CONFORMITY ANALYSIS

Introduction

SANDAG, as the Metropolitan Planning Organization (MPO), is responsible for the adoption of the Regional Transportation Improvement Program (RTIP), the multiyear program of proposed major highway, arterial, transit, and bikeway projects in the San Diego region. The 2010 RTIP, which covers the period FY 2011 to FY 2015, must conform to the State Implementation Plans (SIPs) for air quality. Conformity to the SIP means that transportation activities in the 2010 RTIP will not create new air quality violations, worsen existing violations, or delay the attainment of the national ambient air quality standards.

The Board of Directors adopted the 2010 RTIP, including the regional emissions analysis at its meeting on September 24, 2010. The 2011 Federal State Transportation Improvement Program (FSTIP), which includes the SANDAG 2010 RTIP, received federal approval on December 14, 2010. Whenever there is an update to the Regional Transportation Plan (RTP), SANDAG is required to re-determine conformity of the RTIP within six months. RTIP Amendment No. 13 is being processed to meet this requirement and follows the scheduled Board adoption of the 2050 RTP (Agenda No. 9A).

With the update to the 2050 RTP, member agencies were provided the opportunity to revise project schedules, scopes, budgets and the capacity status impacting the air quality emissions analysis. Project changes affecting the current 2010 RTIP were incorporated as part of Amendment No. 13. The regional emissions analysis that incorporates these changes was presented to the Conformity Working Group at its August 3, 2011, meeting. The draft project listing for Amendment No. 13 to the 2010 RTIP, including the draft Air Quality Conformity Analysis, was distributed for a 30-day review and public comment on August 1, 2011. No comments were received in regards to the updated air quality emissions analysis or to the draft list of projects.

Discussion

In addition to consistency with the 2050 RTP, Amendment No. 13 also represents the quarterly amendment that includes changes as requested by member agencies. Attachment 2 provides a summary level update to both the financial capacity and air quality conformity analyses and includes individual project listings as well as public participation information.
Independent Taxpayer Oversight Committee

The Independent Taxpayer Oversight Committee (ITOC) is the independent citizen oversight committee that reviews TransNet-funded projects. This item is scheduled to be presented to the ITOC at its November meeting as an informational item.

Below summarizes the changes in this amendment with additional details included in Table 1-3 of Attachment 2.

Caltrans

- **I-805 Direct Access Ramp and HOV at Carroll Canyon (CAL09C)** - This amendment proposes to update the Open to Traffic schedule for this project from June 2012 to September 2013. Total project remains at $76,243,000.

- **I-15 Managed Lanes-North Segment (CAL18A)** - This amendment proposes to revise the project description and scope to include the following: “add northbound auxiliary lane from Valley Parkway to ½ mile north of Rte 78.” Total project remains at $187,887,000.

- **SR 52 Auxiliary Lanes, Truck Lane and Inside Widening (CAL26B)** - This amendment proposes to update the Open to Traffic schedule for Phase 2 of this project from June 2013 to December 2019. Total project remains at $44,245,000.

- **SR 76 East (CAL29B)** - This amendment proposes to revise funding between fiscal years in order to be consistent with the updated and approved FY 2012 CIP. Total project remains at $201,549,000.

- **Highway Bridge Program (CAL44)** - On an annual basis, Caltrans publishes the Highway Bridge Program (HBP) project listings, which consist of capacity increasing and non-capacity increasing bridge projects for the San Diego region. The Bent Avenue Bridge (SM46) project, previously shown as a capacity increasing project under the City of San Marcos, has been determined to be a non-capacity increasing project; therefore this project transferred from being a stand-alone project and is now incorporated as a part of this HBP Lump Sum project CAL44. Total programming increases to $121,013,000.

- **I-805 HOV/Managed Lanes – North (CAL78B)** - This amendment proposes to revise funding for federal Congestion Mitigation and Air Quality funds and update the Open to Traffic schedule from January 2016 to December 2015. Total project remains at $174,924,000.

- **I-805 HOV/Managed Lanes - South (CAL78C)** - This amendment proposes to add $10 million of federal Regional Surface Transportation Program (RSTP) funds between FY 2011 and FY 2012. This action would allow Caltrans to leverage federal funds, which reduces the amount of TransNet funds needed for this project. This amendment proposes to exchange a like amount, or $10 million, of TransNet-Major Corridors (MC) with RSTP funds. Total project remains at $231,016,000.
City of Chula Vista

- **Harborside Elementary Pedestrian Improvements (CHV46)** - This amendment proposes to add TransNet – Local Street Improvement (LSI) Carry Over funding in FY 2012 in order to complete the construction of this project. Total project increases to $817,000.

- **Eastern Chula Vista TSM/TDM System (CHV64)** - This amendment proposes to replace TransNet – LSI funds with Local Regional Transportation Congestion Improvement Program funds in accordance with the City Council approved FY 2012 CIP. Total project increases to $450,000.

- **Roadway Improvements at Olympic Parkway and Brandywine Ave. (CHV67)** - This amendment proposes to add this new project, which would add a new left turn pocket to Brandywine Avenue, to the 2010 RTIP. Total project is $300,000.

City of Lemon Grove

This amendment proposes to increase TransNet funding for the following projects in order to be consistent with the City Council approved FY 2012 CIP:

- **Lemon Grove Avenue Realignment Project (LG13)** – $2,437,000
- **Traffic Improvements (Preventative Maintenance) (LG14)** – $533,000
- **Traffic Improvements (Congestion Relief) (LG18)** – $279,000

San Diego Association of Governments

- **FTA Section 5310 Elderly and Disabled Transit Program (SAN125)** – At its September 2011 meeting, the California Transportation Commission approved the funding for this statewide program. This amendment proposes to add the FY 2012 program of projects in the San Diego region for the FTA Section 5310 program. Total project increases to $4,062,000.

City of San Marcos

- **SR78/Smilax Interchange Improvements (SM10)** - This amendment proposes to carry over this project into the 2010 RTIP in order for this project to be included in the SANDAG regional air quality analysis for the 2050 RTP. Project remains at $150,000.

- **Woodland Parkway Interchange Improvements (SM24)** - This amendment proposes to reduce local funding and update the Open to Traffic schedule from June 2013 to January 2017, because this project has been delayed due to budget constraints. Total project decreases to $46,150,000.

- **Bent Avenue Bridge between San Marcos Blvd and Discovery Street (SM46)** - This amendment proposes to modify the current programming of this project in the 2010 RTIP and reprogram it as part of CAL44, as stated earlier in the report. Project SM46 would be deleted.

- **Creekside Drive (SM48)** - This amendment proposes to add this new project which will construct a two-lane road from Via Vera Cruz to Grand Avenue using TransNet-Bond funds. Total project is $6,905,000.

- **Palomar Station Pedestrian Bridge (SM49)** - On August 17, 2011, the City was awarded approximately $782,000 of Transportation Community and System Preservation funds for this project. This amendment proposes to add this new project which will construct a pedestrian...
bridge over West Mission Road from Palomar College Transit Center to the NCTD Sprinter station. Total project is $1,682,000.

This amendment proposes to increase TransNet funding for the following projects in order to be consistent with the City Council approved FY 2012 CIP:

- **Borden Road Street Improvements and Bridge Construction (SM25)** – $13,596,000
- **Street Maintenance Operations (SM38)** – $2,714,000

City of Vista

- **W. Vista Way Widening Construction – Phase I (VISTA08A)** – This amendment proposes to update the Open to Traffic schedule from December 2010 to June 2015 due to a delay in the project. Total project remains at $2,908,000.

**Fiscal Constraint Analysis**

Federal regulations require the 2010 RTIP to be a revenue-constrained document with programmed projects based upon available or committed funding and/or reasonable estimates of future funding. Chapter 2 of Attachment 2 provides updated program summaries including a comparison from the prior approved 2010 RTIP amendment. Based upon the analysis, the projects contained within the 2010 RTIP, including Amendment No. 13, are reasonable when considering available funding sources.

**Air Quality Analysis**

On September 28, 2010, SANDAG found the 2010 RTIP in conformance with the SIPs for the San Diego region in accordance with the provisions of 176(c) of the federal Clean Air Act (42 USC §7506(c)), and with the Regional Air Quality Strategy, in accordance with California law. Conformity to the SIPs means that transportation activities will not create new air quality violations, worsen existing violations, or delay the attainment of the national ambient air quality standards. All of the required regionally significant capacity increasing projects were included in the quantitative emissions analysis conducted for the 2050 RTP and the 2010 RTIP, as amended.

Projects in RTIP Amendment No. 13 meet the conformity provisions of the Transportation Conformity Rule (40 CFR §93.122(g)). An additional air quality analysis was conducted for all capacity increasing projects in Amendment No. 13 through a quantitative emissions analysis included in Chapter 3 of Attachment 2. All other projects not included in the air quality conformity analysis are either noncapacity increasing or are exempt from the requirement to determine conformity according to the Transportation Conformity Rule (40 CFR §93.122 (b) and 93.122(c)). SANDAG followed interagency consultation procedures to determine which projects are exempt. Amendment No. 13 does not interfere with the timely implementation of Transportation Control Measures. The 2010 RTIP, including Amendment No. 13, remains in conformance with the SIPs.

GARY L. GALLEGOS  
Executive Director

Attachments: 1. Resolution No. 2012-07: Approving Amendment No. 13 to the 2010 RTIP  
2. 2010 RTIP Amendment No. 13

Key Staff Contact: Michelle Merino, (619) 595-5608, mmer@sandag.org
RESOLUTION APPROVING AMENDMENT NO. 13 TO THE 2010 REGIONAL TRANSPORTATION IMPROVEMENT PROGRAM

WHEREAS, on September 24, 2010, SANDAG adopted the 2010 Regional Transportation Improvement Program (RTIP) and found the 2010 RTIP in conformance with the applicable State Implementation Plans (SIPs) for air quality and the 2009 Regional Air Quality Strategy (RAQS), in accordance with California law; and

WHEREAS, on December 14, 2010, the United States Department of Transportation (USDOT) determined the 2010 RTIP and 2030 San Diego Regional Transportation Plan: Pathways for the Future (2030 RTP) in conformance to the applicable SIPs in accordance with the provisions of 40 Code of Federal Regulations (CFR) Parts 51 and 93; and

WHEREAS, various agencies have requested the addition of new capacity increasing projects as well as revisions to existing projects for inclusion in the 2010 RTIP as shown in Table 1-3 of Attachment 2; and

WHEREAS, the amendment is consistent with the metropolitan transportation planning regulations per 23 CFR Part 450; and

WHEREAS, this amendment is consistent with the 2050 RTP, which conforms to the 2002 and 2004 SIPs for air quality, and to the emissions budgets from the 2007 Eight-Hour Ozone Attainment Plan for San Diego County, which were found adequate for transportation conformity purposes by the U.S. Environmental Protection Agency in 2008; and

WHEREAS, the updated Air Quality Conformity Analysis for Amendment No. 13 to the 2010 RTIP as shown in Chapter 3 of Attachment 2 has been found to be in conformance with the applicable SIPs, and the 2009 RAQS in accordance with California law; and

WHEREAS, Amendment No. 13 to the 2010 RTIP continues to provide for timely implementation of transportation control measures contained in the adopted RAQS/SIPs for air quality and a quantitative emissions analysis demonstrates that the implementation of the RTIP projects and programs meet all the federally required emissions budget targets; and

WHEREAS, projects in Amendment No. 13 satisfy the transportation conformity provisions of 40 CFR 93.122(g) and all applicable transportation planning requirements per 23 CFR Part 450; and

WHEREAS, all other projects in Amendment No. 13 are either noncapacity increasing or exempt from the requirements to determine conformity; and
RESOLUTION NO. 2012-07

WHEREAS, the 2010 RTIP Amendment No. 13 is fiscally constrained as shown in Tables 2-1a through 2-1c (Chapter 2 of Attachment 2); and

WHEREAS, the projects in Amendment No. 13 are consistent with the Public Participation Policy adopted by the SANDAG Board of Directors;

NOW THEREFORE

BE IT RESOLVED, that SANDAG finds the 2010 RTIP, including Amendment No. 13, is consistent with the 2050 RTP, is in conformance with the applicable SIPs and the 2009 RAQS for the San Diego region, is consistent with SANDAG Intergovernmental Review Procedures, and is consistent with SANDAG Public Participation Policy, as amended; and

BE IT FURTHER RESOLVED, that all regionally significant capacity-increasing projects included in Amendment No. 13 to the 2010 RTIP are included in the 2050 RTP.

PASSED AND ADOPTED this 28th day of October 2011.

________________________________________           ATTEST: ________________________________________
CHAIRPERSON                   SECRETARY

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

ADVISORY MEMBERS: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, San Diego Unified Port District, San Diego County Water Authority, Southern California Tribal Chairmen’s Association, and Mexico.
2010
REGIONAL TRANSPORTATION
IMPROVEMENT PROGRAM (RTIP)
AMENDMENT NO. 13

October 28, 2011
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Chapter 1

EXECUTIVE SUMMARY
Chapter 1
EXECUTIVE SUMMARY

OVERVIEW

The 2010 Regional/Federal Transportation Improvement Program (RTIP) is a multi-billion dollar, five-year program of major highway, transit arterial, and nonmotorized projects funded by federal, state, TransNet local sales tax, and other local and private funding covering the years FY 2010/11 to FY 2014/15. The 2010 RTIP, which includes the air quality emissions analysis for all regionally significant projects, requires approval by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). The 2011 Federal State Transportation Improvement Program (FSTIP) which includes the SANDAG 2010 RTIP received federal approval on December 14, 2010.

The 2010 RTIP is a prioritized program designed to implement the region’s overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while reducing transportation related air pollution in support of efforts to attain federal and state air quality standards for the region. The 2010 RTIP also incrementally implements the Regional Transportation Plan (RTP), the long-range transportation plan for the San Diego region. A summary of major highway, transit, local street and road, and other projects is provided in Table 1-1.

Amendment No. 13 to the 2010 RTIP revises existing capacity increasing projects. The 2010 RTIP document, published in September 2010, fully documents the RTIP development process, project listings, financial capacity analysis, and the air quality conformity analysis. This report focuses on updated fiscal capacity analysis and new regional air quality emissions analysis for conformity purposes. Amendment No. 13 reflects changes to projects which have been updated in order to be consistent with the SANDAG revenue constrained RTP entitled, 2050 Regional Transportation Plan: Our Region. Our Future. (2050 RTP). The Final 2010 RTIP document as well as all subsequent amendments are available on the SANDAG Web site at www.sandag.org/2010rtip.

Consistency with the 2050 RTP

On October 28, 2011, the SANDAG Board of Directors is scheduled to find the SANDAG 2050 revenue constrained RTP entitled, San Diego 2050 Regional Transportation Plan: Our Region. Our Future. (2050 RTP), in conformance with federal air quality and planning regulations, and to adopt the 2050 RTP. The FHWA and the FTA are anticipated to issue a finding of conformity for the 2050 RTP before December 10, 2011. The 2010 RTIP, including Amendment No. 13, is consistent with the 2050 RTP. As a financially-constrained document, the 2010 RTIP contains only those major transportation projects listed in the revenue-constrained plan of the 2050 RTP.

Financial Capacity Analysis

Federal regulations require the 2010 RTIP to be a revenue-constrained document with programmed projects based upon available or committed funding and/or reasonable estimates of future funding. Funding assumptions are generally based upon: (1) authorized or appropriated levels of federal and state funding
from current legislation; (2) conservative projections of future federal and state funding based upon a
continuation of current funding levels; (3) the most current revenue forecasts for the TransNet program; and
(4) the planning and programming documents of the local transportation providers.

Chapter 4 of the Final 2010 RTIP discusses in detail the financial capacity analysis of major program areas
including discussion of available revenues. Chapter 2 of this report provides updated program summaries.
Table 1-3 includes the projects proposed for Amendment No. 13. Tables 2-1a to 2-1c demonstrate that the 2010
RTIP is fiscally constrained. Based upon this analysis, the projects contained within the 2010 RTIP, including the
projects in Amendment No. 13, are reasonable when considering available funding sources.

Air Quality Conformity Determination

Federal metropolitan planning and air quality regulations prescribe the process for determining air quality
conformity. These regulations require that the proposed RTIP: (1) provide for the timely implementation of
transportation control measures (TCMs); (2) include a quantitative emissions analysis of projects programmed
in the RTIP, including all regionally significant projects; and (3) be within the region’s emissions budgets
(targets) included in the approved State Implementation Plan (SIP).

The 2010 RTIP programs substantial funds for the implementation of the four TCMs (identified as “T-tactics”) adopted in the 1982 Regional Air Quality Strategy (RAQS) and subsequent revisions/1982 SIP for air quality improvement. As shown in Table 1-2, the TCMs/T-tactic projects programmed for implementation total approximately $4.1 billion, or approximately 33 percent of the total funds programmed. Included are $25.6 million for Ridesharing, $3.9 billion for Transit Improvements, $100 million for Bicycle Facilities and Programs, and $97.3 million for Traffic Flow Improvements. Based upon this analysis, the 2010 RTIP, Amendment No. 13 provides for the expeditious implementation of the four existing TCMs in the 2009 RAQS, which remain the federally approved TCMs for the San Diego region.

Quantitative air quality emissions analyses were conducted for the years 2018, 2020, 2030, and 2040 revenue constrained transportation scenarios, as shown in Chapter 3. A quantitative air quality emissions analysis was also conducted for the year 2050 for information purposes. A draft report that discusses the results of this analysis, including Amendment No. 13, was released for public comment on August 1, 2011 and reviewed by the San Diego Region Conformity Working Group (CWG) at its meeting on August 3, 2011. The 2010 RTIP Amendment No. 13 meets the conditions for determining conformity with the applicable SIP for air quality. A detailed description of the regional emissions analysis and modeling procedures conducted for the 2010 RTIP is included in Appendix C of the Final 2010 RTIP. Chapter 3 of this report summarizes the air quality conformity analysis for Amendment No. 13.

Public Participation

It is the policy of SANDAG to encourage public participation in the development of agency planning and
programming activities. SANDAG has various working groups made up of stakeholders and other members
of the public. The public is provided opportunities to participate through comment at SANDAG Board and
committee meetings, SANDAG public notices of document availability and public hearings, and through the
SANDAG public communications program. Pursuant to 23 U.S.C. 134(i), the Draft 2010 RTIP was released for
public review and comment on July 27, 2010 for a minimum of 30 days and a public hearing was held on
September 24, 2010.

Examples of public outreach efforts and ongoing participation include:

Independent Taxpayer Oversight Committee (ITOC): In conformance with 2004 TransNet measure, a
citizen advisory committee, the ITOC, oversees projects funded through the TransNet program. As the
document through which SANDAG identifies TransNet projects, the RTIP is reviewed by the ITOC, and their comments on the TransNet Program of Projects are conveyed to the SANDAG Transportation Committee, and ultimately, to the Board of Directors.

**Tribes:** In addition to sending out notices to local tribal governments regarding the development of the RTIP, SANDAG actively solicited participation from the 17 tribal governments, along with the Reservation Transportation Authority in San Diego County. SANDAG hosted a tribal forum made up of elected officials from each of the tribes. SANDAG also held a workshop specifically to seek involvement in the regional planning and programming processes.

**Public Workshops:** SANDAG provided information for the RTIP seeking comments during a special workshop developed for the 2030 San Diego Regional Transportation Plan: Pathways for the Future (RTP). SANDAG is undergoing an extensive public workshop for the upcoming 2050 RTP, including seeking public input for the 2010 RTIP.

**Expansion of Electronic Notifications:** In addition to the current list of external industry professionals, SANDAG continually strives to expand the notifications to other citizen-involved working groups. SANDAG has established accounts on Facebook and Twitter to ensure maximum outreach.

Appendix A in the 2010 RTIP describes the SANDAG public participation process and includes a copy of the latest Public Participation Policy which contains the section specifically addressing the RTIP development and amendment process.

At its meeting on December 18, 2009, the SANDAG Board of Directors adopted an updated **Public Participation Plan (PPP).** The revised PPP reflects the SANDAG commitment to public participation and involvement to include all residents and stakeholders in the regional planning and decision-making process. The development of the PPP was a six-month collaborative process from June to December 2009 that included development, input, and feedback from the SANDAG Policy Advisory Committees, Regional Planning Stakeholders Working Group, community and business groups, residents, and other stakeholders.

The PPP was developed in accordance with guidelines established by the Federal Highway Administration for metropolitan transportation planning (23 CFR 450.316). It addresses Title VI, related nondiscrimination requirements, and reflects the principles of social equity and environmental justice. Included in the PPP are procedures, strategies, and outcomes associated with the ten requirements listed in 23 CFR 450.316. The PPP also fulfills various state and federal public involvement requirements and is available on the SANDAG Web site at www.sandag.org.
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<th>DESCRIPTION</th>
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*Includes SANDAG planning and the TransNet Environmental Mitigation Program
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<td><strong>TRANSIT IMPROVEMENTS</strong></td>
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<td>Blue Line (including vehicle purchase)</td>
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<td>$658,719</td>
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<td>I-15 BRT</td>
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<td>Other BRT</td>
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<td><strong>Total All Transportation Projects in 2010 RTIP:</strong></td>
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<td><strong>Share of T-Tactics Projects in 2010 RTIP:</strong></td>
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Table 1-3
2010 Regional Transportation Improvement Program
DRAFT Amendment No. 13
San Diego Region (in $000s)

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<th>MPO ID: CAL09C</th>
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<tr>
<td>Project Title: I-805 Direct Access Ramp and HOV at Carroll Canyon</td>
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<td>Project Description: From Carroll Canyon Road to I-5 - on I-805, construct Direct Access Ramps (DARs) and HOV lanes to Carroll Canyon Road</td>
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<td>PPNO: 0716</td>
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<tr>
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<th>14/15</th>
<th>PE</th>
<th>RW</th>
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* Additional local contribution programmed in SD32

| PROJECT LAST AMENDED 10-09 |
|---|---|---|---|---|---|---|---|---|---|
| | TOTAL | PRIOR | 10/11 | 11/12 | 12/13 | 13/14 | 14/15 | PE | RW | CON |
| Other Fed - ARRA-RSTP | $51,817 | $51,817 | | | | | | | | |
| TransNet - MC | $24,426 | $16,928 | $1,213 | $1,619 | $964 | $2,066 | $1,636 | $15,935 | $1,200 | $7,291 |
| TOTAL | $76,243 | $68,745 | $1,213 | $1,619 | $964 | $2,066 | $1,636 | $15,935 | $1,200 | $59,108 |
San Diego Region (in $000s)

2010 Regional Transportation Improvement Program
DRAFT Amendment No. 13

Caltrans

MPO ID: CAL18A  RTIP #:10-13

Project Title: I-15 Managed Lanes-North Segment
Project Description: From Centre City Parkway to SR 78 - construct managed lanes and add northbound auxiliary lane from Valley Parkway to 1/2 mile north of Rte 78; Toll Credits of $712 will be used to match FY12 federal funds for the construction phase.

Change Reason: Revise project description, Revise project scope

RT:15 Capacity Status:CI Exempt Category:Non-Exempt

Est Total Cost: $187,887  Open to Traffic: Dec 2011

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PROJECT LAST AMENDED 10-09

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<th>RW</th>
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### Project Title:
SR 52 Auxiliary Lanes, Truck Lane and Inside Widening

### Project Description:
From SR 52/I-15 to Mast Blvd. Undercrossing (7.4/13.3) (Aux Lanes); from Mast Blvd. Undercrossing to SR 52/SR 125 separation (13.3/14.9) (IW); and from west of Santo Road Overcrossing to west of Oak Canyon Bridge (truck lanes) - in San Diego, Phase 1: construct eastbound and westbound auxiliary lanes and truck lanes; Phase 2: add one mixed flow lane in each direction, widen two structures and install a ramp meter at Mission Gorge Road (PE only) and widen existing roadway.

**Change Reason:** Update Open to Traffic date for Phase 2

**RT:** 52  |  **Capacity Status:** CI  |  **Exempt Category:** Non-Exempt

**Est Total Cost:** $44,245

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**PROJECT LAST AMENDED 10-09**

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San Diego Region (in $000s)

2010 Regional Transportation Improvement Program
DRAFT Amendment No. 13
San Diego Region

Caltrans

MPO ID: CAL29B

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| RT:76 | Capacity Status: CI | Exempt Category: Non-Exempt |

| Est Total Cost: $201,549 | Open to Traffic: Jun 2015 |

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<p>| PROJECT LAST AMENDED 10-09 |
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## San Diego Region (in $000s)

### 2010 Regional Transportation Improvement Program

#### DRAFT Amendment No. 13

**MPO ID:** CAL44  
**RTIP #:** 10-13

**Caltrans**

**Project Title:** Highway Bridge Program

**Project Description:** Countywide - projects are consistent with 40 CFR Part 93.126 Exempt Table 2 categories – widen narrow pavements or reconstructing bridges (no additional travel lanes)

**Change Reason:** Increase funding

**Capacity Status:** NCI  
**Exempt Category:** Safety - Non capacity widening or bridge reconstruction

### Est Total Cost: $121,013

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**PROJECT LAST AMENDED 10-09**

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### San Diego Region (in $000s)

#### 2010 Regional Transportation Improvement Program

**DRAFT Amendment No. 13**

**MPO ID: CAL78B**

**Project Title:** I-805 HOV/Managed Lanes - North

**Project Description:**
On I-805 from the I-805/SR 52 to Sorrento Valley, on SR 52 at the I-805/SR 52 separation - preliminary engineering for construction of managed lanes; design and construct Phase 1 - one High Occupancy Vehicle (HOV) lane in the median in each direction including the south facing Direct Access Ramps at Carroll Canyon Rd. Phase 1 Post Miles 23.2-26.7. Toll Credits of $1,816 will be used to match FY11 federal funds for the construction phase, Toll Credits of $1,482 will be used to match FY12 federal funds for the construction phase, Toll Credits of $2,690 will be used to match FY13 federal funds for the construction phase, Toll Credits of $3,439 will be used to match FY14 federal funds for the construction phase, Toll Credits of $1,837 will be used to match FY15 federal funds for the construction phase.

**Change Reason:** Revise funding between fiscal years, Update Open to Traffic date

**Est Total Cost:** $174,924

**Open to Traffic:** Dec 2015

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**PROJECT LAST AMENDED 10-09**

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**2010 Regional Transportation Improvement Program**  
**DRAFT Amendment No. 13**  
**San Diego Region (in $000s)**

**Caltrans**  
**MPO ID: CAL78C**  
**RTIP #:10-13**

**Project Title:** I-805 HOV/Managed Lanes - South  
**Project Description:** From Palomar Street to Landis Street - environmental document for I-805 widening in San Diego, Chula Vista, and National City from Palomar Street to State Route 94; design and construct 2 High Occupancy Vehicle (HOV) lanes in the median of I-805 including a Direct Access Ramp (DAR) at Palomar Street

**Change Reason:** Revise funding between fiscal years, Revise funding between phases

**Capacity Status:** CI  
**Exempt Category:** Non-Exempt

**Est Total Cost:** $231,016  
**Open to Traffic:** Dec 2014

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**Project Title:** Harborside Elementary Pedestrian Improvements

**Project Description:** Area in the vicinity of Harborside Elementary School southeast of the intersection of Naples Street and Industrial Blvd. - install missing pedestrian improvements and rehabilitate existing pedestrian infrastructure in order to provide pedestrians with a safer route to school

**Change Reason:** Increase funding

**Capacity Status:** NCI

**Exempt Category:** Air Quality - Bicycle and pedestrian facilities

**Est Total Cost:** $817

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**PROJECT LAST AMENDED 10-00**

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## 2010 Regional Transportation Improvement Program
### DRAFT Amendment No. 13
### San Diego Region (in $000s)

### Chula Vista, City of

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<td><strong>Project Title:</strong></td>
<td>Eastern Chula Vista TSM/TDM System</td>
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<tr>
<td><strong>Project Description:</strong></td>
<td>East H Street, Telegraph Canyon Road and Olympic Parkway from I-805 to about one mile east - three major east/west corridors constantly need signal timing changes due to fluctuating traffic demands; improving the Transportation Systems Management (TSM) and Transportation Demand Management (TDM) will improve mobility and reduce delays; permanent software/hardware systems will incorporate additional vehicle/bicycle detection on approaches and gaps; real time data collected will be used to assess, refine and implement optimal traffic signal timing plans; this information will be made available to the region, Caltrans and the public through the Regional Arterial Management System (RAMS)</td>
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<td><strong>Change Reason:</strong></td>
<td>Revise fund source</td>
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### Project Description:
**Project Title:** Eastern Chula Vista TSM/TDM System
**Change Reason:** Revise fund source
**Capacity Status:** NCI
**Exempt Category:** Other - Traffic signal synchronization projects

### Est Total Cost: $450

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### PROJECT LAST AMENDED 10-07

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<td><strong>Project Title:</strong></td>
<td>Roadway Improvements at Olympic Parkway and Brandywine Ave.</td>
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<td><strong>Project Description:</strong></td>
<td>Olympic Parkway from Brandywine Ave. to 450 feet east - roadway improvements including increasing the length of westbound Olympic Pkwy. left turn pocket to southbound Brandywine Ave.; also include traffic signal modifications, signal timing changes and signing and striping changes</td>
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<td><strong>Change Reason:</strong></td>
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### Project Description:
**Project Title:** Roadway Improvements at Olympic Parkway and Brandywine Ave.
**Change Reason:** New project
**Capacity Status:** NCI
**Exempt Category:** All Projects - Interchange reconfiguration projects

### Est Total Cost: $300

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Lemon Grove, City of

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<td>Project Title: Lemon Grove Avenue Realignment Project</td>
<td>TransNet - LSI: CR</td>
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<td>Project Description: Lemon Grove Avenue at SR94 - a key project in the redevelopment of the city’s Downtown Village Specific Plan, this project will realign Lemon Grove Avenue at SR94 adding traffic lanes and improving access to and from SR-94, reducing motorist delays and emissions.</td>
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<td>Project Description: Citywide - traffic related projects scheduled throughout each fiscal year: traffic loop replacements, traffic signal upgrades, speed survey, street striping improvements, traffic calming studies, and the repair or replacement of street signs; these projects are part of the annual maintenance program established within the City to maintain the operational readiness of the street system</td>
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**San Diego Region (in $000s)**

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<td><strong>Project Title:</strong> Traffic Improvements (Congestion Relief)</td>
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<td><strong>Project Description:</strong> Citywide - citywide projects may include: median installation for safety improvement or left turn movement, new traffic signals, passive permissive left turn installation, signal removal for congestion relief reasons, traffic signal upgrades, intersection lighting, traffic signal coordination, and traffic signal interconnection/optimization</td>
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San Diego Association of Governments

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<th>MPO ID: SAN125</th>
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<tbody>
<tr>
<td>Project Title: FTA Section 5310 Elderly and Disabled Transit Program</td>
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<tr>
<td>Project Description: San Diego County - purchase of modified vans/buses by various non-profit organizations for purposes of transporting elderly and disabled. Toll Credits of $385 will be used to match FY12 federal funds for the construction phase</td>
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<tr>
<td>Exempt Category: Mass Transit - Purchase new buses and rail cars to replace existing vehicles or minor expansions of fleet</td>
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Est Total Cost: $4,062

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PROJECT LAST AMENDED 10-00

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San Marcos, City of

### MPO ID: SM10  RTIP #:10-13

**Project Title:** SR78/Smilax Interchange Improvements  
**RAS:** (202)

**Project Description:** From Smilax Road to Smilax Road - Construct new interchange at Smilax Road and SR78 - Included for Air Quality Analysis purposes only

**Change Reason:** Carry over from 06-16

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<thead>
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<th>Capacity Status: CI</th>
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**Est Total Cost:** $150

**Open to Traffic:** Mar 2030

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### MPO ID: SM24  RTIP #:10-13

**Project Title:** Woodland Parkway Interchange Improvements  
**RAS:** (TA 7-51)

**Project Description:** From La Moree Road to Rancheros Drive - modify existing ramps at Woodland Parkway and Barham Drive; widen and realign SR 78 undercrossing and associated work

**Change Reason:** Reduce funding

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<th>Capacity Status: CI</th>
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**Est Total Cost:** $46,150

**Open to Traffic:** Jan 2017

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**PROJECT LAST AMENDED 10-03**

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2010 Regional Transportation Improvement Program  
DRAFT Amendment No. 13  
San Diego Region (in $000s)  

San Marcos, City of

<table>
<thead>
<tr>
<th>Project Title: Borden Road Street Improvements and Bridge Construction</th>
<th>Project Description: From Twin Oaks to Woodward Street - Construction of approximately 700 lineal feet of a new 4-lane secondary arterial including a bridge.</th>
<th>Change Reason: Increase funding</th>
<th>Capacity Status: CI</th>
<th>Exempt Category: Non-Exempt</th>
<th>Est Total Cost: $13,596</th>
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### PROJECT LAST AMENDED 10-03

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<th>MPO ID: SM38</th>
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<th>Project Title: Street Maintenance Operations</th>
<th>Project Description: Various Locations - roadway, street lighting, traffic signal, signage maintenance</th>
<th>Change Reason: Increase funding</th>
<th>Exempt Category: Safety - Pavement resurfacing and/or rehabilitation</th>
<th>Est Total Cost: $2,714</th>
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### PROJECT LAST AMENDED 10-00

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<th>MPO ID: SM38</th>
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<th>Project Title: Street Maintenance Operations</th>
<th>Project Description: Various Locations - roadway, street lighting, traffic signal, signage maintenance</th>
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<th>Exempt Category: Safety - Pavement resurfacing and/or rehabilitation</th>
<th>Est Total Cost: $2,714</th>
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# 2010 Regional Transportation Improvement Program
## DRAFT Amendment No. 13
### San Diego Region (in $000s)

#### San Marcos, City of

**MPO ID:** SM46  
**DELETED**  
**RTIP #:** 10-13

<table>
<thead>
<tr>
<th>Project Title:</th>
<th>Bent Avenue Bridge between San Marcos Blvd and Discovery Street</th>
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<tbody>
<tr>
<td>Project Description:</td>
<td>From San Marcos Blvd to Discovery Street - in San Marcos, widen existing roadway and construct bridge to a 4-lane arterial road including sidewalks and bicycle facilities</td>
</tr>
<tr>
<td>Change Reason:</td>
<td>Delete project, Moved to CAL44</td>
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| Est Total Cost: | $0 |
| Open to Traffic: | Jun 2016 |

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**PROJECT LAST AMENDED 10-00**

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**MPO ID:** SM48  
**RTIP #:** 10-13

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<tr>
<th>Project Title:</th>
<th>Creekside Drive</th>
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<tbody>
<tr>
<td>Project Description:</td>
<td>Creekside Drive from Via Vera Cruz to Grand Ave - construct approximately 3,000 feet of a two-lane collector road from Via Vera Cruz to Grand Avenue in the City of San Marcos; will include two 12’ lanes, diagonal parking on the north side, and parallel parking on the south side; the project will also include a 10’ bike trail meandering along the south side</td>
</tr>
<tr>
<td>Change Reason:</td>
<td>New project</td>
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| Est Total Cost: | $6,905 |
| Open to Traffic: | Jun 2013 |

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San Marcos, City of

<table>
<thead>
<tr>
<th>MPO ID: SM49</th>
<th>Project Title: Palomar Station Pedestrian Bridge</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Project Description: West Mission Road from Palomar College Transit Center to NCTD Sprinter station - design and construction of a 100 foot long pedestrian bridge over West Mission Road; bridge will link the Palomar Sprinter station with the Palomar College Transit Center</td>
</tr>
<tr>
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| Est Total Cost: $1,682 | Open to Traffic: Feb 2013 |

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2010 Regional Transportation Improvement Program
DRAFT Amendment No. 13
San Diego Region (in $000s)
Project Title: W. Vista Way Widening Construction - Phase I, CIP 8191
Project Description: From Emerald Dr to Grapevine Rd - The scope of this project is to provide Right-of-Way acquisition and construction for the widening of W. Vista Way a distance of 1,500 feet from the intersection with Emerald Drive to the intersection with Grapevine Road
Change Reason: Update Open to Traffic date
Capacity Status: CI Exempt
Category: Non-Exempt
Est Total Cost: $2,908
Open to Traffic: Jun 2015

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PROJECT LAST AMENDED 10-05

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### RTIP Fund Types

#### Federal Funding

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<th>Code</th>
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<td>American Recovery and Reinvestment Act (Federal Stimulus Program)</td>
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<tr>
<td>CMAQ</td>
<td>Congestion Mitigation and Air Quality</td>
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<tr>
<td>DEMO-Sec 117/STP</td>
<td>Surface Transportation Program under FHWA Administrative Program (congressionally directed appropriations)</td>
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<tr>
<td>FTA Section 5310</td>
<td>Federal Transit Administration Elderly &amp; Disabled Program</td>
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<tr>
<td>HBP</td>
<td>Highway Bridge Program under SAFETEA-LU</td>
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<tr>
<td>HBRR</td>
<td>Highway Bridge Repair and Rehabilitation under TEA-21</td>
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<td>HPP</td>
<td>High Priority Program under SAFETEA-LU</td>
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<td>CMAQ/RSTP Conversion</td>
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#### State Funding

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Chapter 2
FINANCIAL CAPACITY ANALYSIS
Chapter 2
FINANCIAL CAPACITY ANALYSIS

This chapter provides an update to the analysis of the financial capacity of the region's programmed transportation projects. Financial capacity is measured by a comparison of the total cost of the proposed projects against the available revenues and a test of the reasonableness of the revenue assumptions.

Overview of the program and available revenues by funding sources is provided for all projects included in Chapter 4 of the Final 2010 RTIP. The assumptions used in the forecasts of available funding are based upon information in the Final 2010 State Transportation Improvement Program (STIP) adopted by the California Transportation Commission (CTC) in October 2009, forecasts provided by the California Department of Transportation, and other forecasts of ongoing transportation funding programs. For the local transportation sales tax program (TransNet), the forecast was updated which takes into account the recent economic trend.

PROGRAM AND REVENUES

Table 2-1a summarizes the revenues available by major funding source (i.e., federal, state, and local), Table 2-1b summaries the program using the revenues, and Table 2-1c provides the remaining revenues available for additional programming. Tables 2-1a to 2-1c include all costs and revenues for all projects in the 2010 RTIP including Amendment No. 13.
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Table 2-1a: Revenues
2010 Regional Transportation Improvement Program
San Diego Region - Through Amendment No. 13 ($000's)

- Revenues for CMAQ and RSTP increased in FY 2011 due to additional apportionment.
- SANDAG engaged in a CMAQ exchange with 3 agencies; receiving additional revenues in FY 2011 to payback in future years.
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<tr>
<th>Funding Source</th>
<th>2010/11</th>
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<th>2012/13</th>
<th>2013/14</th>
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Table 2-1b: Program
2010 Regional Transportation Improvement Program
San Diego Region - Through Amendment No. 13 ($000's)
Table 2-1c: Revenues vs. Program
2010 Regional Transportation Improvement Program
San Diego Region - Through Amendment No. 13 ($000's)

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<td>FEDERAL HIGHWAY</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal Highway Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FEDERAL RAILROAD ADMINISTRATION</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal Railroad Administration Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>REVENUES - PROGRAM TOTAL</td>
<td>$31,670</td>
<td>$32,132</td>
<td>$18,448</td>
<td>$14,710</td>
<td>$20,160</td>
<td>$16,408</td>
</tr>
</tbody>
</table>

31
Chapter 3

AIR QUALITY CONFORMITY ANALYSIS
Chapter 3
AIR QUALITY CONFORMITY ANALYSIS

On April 15, 2004, the EPA designated the San Diego air basin as non-attainment for the 1997 Eight-Hour Ozone Standard. This designation took effect on June 15, 2004. Several areas that are tribal lands in eastern San Diego County were excluded from the nonattainment designation. The air basin was initially classified as a basic non-attainment area under Subpart 1 of the Clean Air Act and the maximum statutory attainment date for the Eight-Hour Ozone Standard was set as June 15, 2009. However, U.S. EPA, in response to a court decision, is expected to rule in 2011 that the San Diego basic non-attainment area be reclassified as a Subpart 2 Serious non-attainment area, with a maximum statutory attainment date of June 15, 2013. Final U.S. EPA action on this proposed reclassification has yet to be taken.

In cooperation with the San Diego Air Pollution Control District (APCD) and SANDAG, the California Air Resources Board (ARB) developed an Eight-Hour Ozone Attainment Plan which was submitted to the U.S. EPA on June 15, 2007. The budgets in the Eight-Hour Ozone Attainment Plan for San Diego County were found adequate for transportation conformity purposes by the U.S. EPA, effective June 9, 2008.

On October 28, 2011, the SANDAG Board of Directors is scheduled to find the SANDAG 2050 revenue constrained RTP entitled, San Diego 2050 Regional Transportation Plan: Our Region. Our Future. (2050 RTP), in conformance with federal air quality and planning regulations. The FHWA and the FTA are anticipated to issue a finding of conformity for the 2050 RTP before December 10, 2011.

The San Diego region also has been designated by the U.S. EPA as a federal maintenance area for the Carbon Monoxide (CO) Standard. On November 8, 2004, the ARB submitted the 2004 revision to the California SIP for CO to the U.S. EPA. Effective January 30, 2006, the U.S. EPA has approved this maintenance plan as a SIP revision.

DEMONSTRATION OF FISCAL CONSTRAINT

The 2010 RTIP, including Amendment No. 13, is consistent with the 2050 RTP. As a financially-constrained document, the 2010 RTIP contains only those major transportation projects listed in the revenue-constrained plan of the 2050 RTP.

DEVELOPMENT OF TRANSPORTATION CONTROL MEASURES

In 1982, SANDAG adopted four Transportation Tactics as elements of the 1982 Revised Regional Air Quality Strategy (RAQS). These Transportation Tactics are ridesharing, transit improvements, traffic flow improvements, and bicycle facilities and programs.

These four Transportation Tactics were subsequently approved by the San Diego Air Pollution Control Board (APCB) and are included in the 1982 SIP for Air Quality as Transportation Control Measures (TCMs). The U.S. EPA approved this State Implementation Plan (SIP) revision for the San Diego Air Basin in 1983. The TCMs
have been fully implemented. Ridesharing, transit, bicycling, and traffic-flow improvements continue to be funded, although the level of implementation established in the SIP has been surpassed.

**AIR QUALITY CONFORMITY REQUIREMENTS**

SANDAG, as the Metropolitan Planning Organization (MPO), and the U.S. DOT must make a determination that the 2010 RTIP, as amended, and the 2050 RTP conform to the applicable SIP. Conformity to the SIP means that transportation activities will not create new air quality violations, worsen existing violations, or delay the attainment of the National Ambient Air Quality Standards (NAAQS).

Based upon the U.S. EPA’s Transportation Conformity Rule, as amended, conformity of transportation plans and programs, including the 2010 RTIP Amendment No. 13 is determined according to the 1990 Clean Air Act Amendments (CAA) [Section 176(c)(3)(A)] if the following is demonstrated:

The 2010 RTIP provides for the timely implementation of the Transportation Tactics contained in the 2009 RAQS. These tactics are also included as TCMs in the 1982 SIP, but have been fully implemented.

A quantitative analysis is conducted on the cumulative emissions of projects programmed within the 2010 RTIP as amended, including all regionally significant, capacity-increasing projects. Further, implementation of the projects and programs must meet the motor vehicle emissions budget developed by local and state air quality agencies and approved by the U.S. EPA. The 2010 RTIP Amendment No. 13 must meet the applicable emission budgets prescribed in the *Eight-Hour Ozone Attainment Plan for San Diego County* which were found adequate for transportation conformity purposes by the U.S. EPA, effective June 9, 2008. Also, the 2010 RTIP as amended must meet the CO emissions budget established in the CO Maintenance Plan (approved by the U.S. EPA in January 2006).

In addition to the required emissions tests, consultation with transportation and air quality agencies is required. The consultation process followed to prepare the air quality conformity analysis complies with the San Diego Transportation Conformity Procedures adopted in July 1998.

Interagency consultation involves SANDAG, the SDAPCD, Caltrans, ARB, the U.S. DOT, and the U.S. EPA, which form the San Diego Region Conformity Working Group (CWG).

Consultation is a three-tier process that:

1. formulates and reviews drafts through a conformity working group;
2. provides local agencies and the public with opportunities for input through existing regional advisory committees and workshops; and
3. seeks comments from affected federal and state agencies through participation in the development of draft documents and circulation of supporting materials prior to formal adoption.

SANDAG consulted with the San Diego Region CWG for the preparation of the new air quality analysis of the 2010 RTIP Amendment No. 13. Conformity of the 2010 RTIP as amended is being determined concurrently with the 2050 *Regional Transportation Plan: Our Region. Our Future.* for consistency purposes.

The schedule for the development of the 2010 RTIP Amendment No. 13 and criteria and procedures for determining conformity were presented to the CWG on August 4 and October 6, 2010. SANDAG also followed interagency consultation procedures for exempt projects. A draft list of exempt and capacity increasing projects was provided to the CWG on January 5, 2011. Additional exempt projects were
distributed to the CWG on October 7, 2011 for interagency consultation. Comments from the CWG are incorporated into the final exempt project list.

The quantitative emissions analyses for the 2010 RTIP Amendment No. 13 and 2050 RTP conformity determination were initiated on December 17, 2010 and the results distributed on February 25, 2011 to the San Diego Region CWG for an initial review and comment period. The San Diego Region CWG reviewed the draft air quality conformity analysis at its March 2, 2011 meeting. The revised draft 2010 RTIP and its conformity analysis and the 2050 RTP conformity determination was released for public review and comment on August 1, 2011. The results of the draft and final regional emissions analysis indicate that the 2010 RTIP, as amended, and 2050 RTP meet the air quality conformity requirements.

The SANDAG Board of Directors is scheduled to make the conformity finding for the 2010 RTIP Amendment No. 13 and 2050 RTP and approve the 2010 RTIP Amendment No. 13 at its October 28, 2011, meeting.

The following sections provide a summary of the air quality conformity analysis of the 2010 RTIP Amendment No. 13 and 2050 RTP in relation to the above conformity requirements.

The first requirement of the air quality conformity finding is to provide for the expeditious implementation of adopted TCMs, which are also the Transportation Tactics included in the 2009 RAQS. These tactics are ridesharing, transit service improvements, traffic flow improvements, and bicycle facilities and programs.

The 1982 SIP established the TCMs, which identified general objectives and implementing actions for each tactic. Due to substantial investments since 1982, SANDAG has fully implemented the TCMs. Ridesharing, transit, bicycling, and traffic flow improvements continue to be funded, although the level of implementation established in the SIP has been surpassed. No TCMs have been removed or substituted from the SIP.

The 2010 RTIP as amended makes substantial progress in programming funds for implementation of the four adopted Transportation Tactics for the San Diego region contained in the 2009 RAQS. Table 3-1 shows that Transportation Tactics programmed for implementation total approximately $4.1 billion, or 33 percent of the total funds programmed. Included are $25.6 million for Ridesharing, $3.8 billion for Transit Improvements, $100 million for Bicycle Facilities and Programs, and $97.2 million for Traffic Flow Improvements.

Based upon this analysis, the 2010 RTIP Amendment No. 13 continues to provide for the expeditious implementation of the four Transportation Tactics approved in the 2009 RAQS.

QUANTITATIVE EMISSIONS ANALYSIS

The second requirement of the conformity finding is to conduct a quantitative emissions analysis on the 2010 RTIP as amended. The emissions analysis must show that implementation of the 2010 RTIP as amended and 2050 RTP meet the emissions budgets established in the 2004 CO Maintenance Plan and in the Eight-Hour Ozone Attainment Plan for San Diego County.

A quantitative emissions analysis was conducted according to the requirements established in the Transportation Conformity Rule under Section 93.122(b). Motor vehicle emissions forecasts were produced for the following analysis years: 2018, 2020, 2030, 2040, and 2050. The emission data for 2050 was prepared using 2040 emission factors, as emission factors for 2050 are not available. The 2050 RTP air quality conformity analysis was conducted for the years 2011-2040. Emissions data for 2050 is included for informational purposes only.
SANDAG’s regional growth forecasts and transportation models, as well as ARB’s emissions model, were used to generate the emissions forecasts. Transportation forecasts were developed using the TransCAD transportation planning computer package. The four-step transportation modeling process includes trip generation, trip distribution, mode split, and trip assignment. The quantitative emissions analysis was conducted using the EMFAC 2007 model.

All of the proposed capacity-increasing improvements identified in the 2010 RTIP as amended that are on the Regional Arterial System (as defined in the RTP) or the FHWA functional classification system (other principal arterials and higher classifications) were modeled.

EMISSIONS BUDGET ANALYSIS

Tables 3-2 and 3-3 on the following page provide a summary of the results of the quantitative emissions analysis conducted for the 2010 RTIP as amended and 2050 RTP.

The analysis shown in Table 3-2 demonstrates that the 2010 RTIP as amended and the 2050 RTP, meet the applicable budgets for the Eight-Hour Ozone standard. Projected reactive organic gas (ROG) and nitrogen oxide (NOx) emissions for 2018, 2020, 2030, and 2040 are below the established SIP budgets. Table 3-3 shows that projected CO emissions from the 2010 RTIP as amended and the 2050 RTP are below the 2003 CO budget of 730 tons per day.
### Table 3-1

#### 2010 RTIP - SAN DIEGO REGION (IN $000s)

**Amendment No. 13**

**TRANSPORTATION TACTICS**

<table>
<thead>
<tr>
<th>RIDESHARING</th>
<th>$25,600</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Subtotal: $25,600</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TRANSIT IMPROVEMENTS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Blue Line (including vehicle purchase)</td>
<td>$455,167</td>
</tr>
<tr>
<td>Mid-Coast</td>
<td>$658,719</td>
</tr>
<tr>
<td>I-15 BRT</td>
<td>$145,909</td>
</tr>
<tr>
<td>Mid-City BRT</td>
<td>$44,526</td>
</tr>
<tr>
<td>Sprinter</td>
<td>$366,678</td>
</tr>
<tr>
<td>SuperLoop</td>
<td>$36,349</td>
</tr>
<tr>
<td>Southbay BRT</td>
<td>$99,908</td>
</tr>
<tr>
<td>Other BRT</td>
<td>$13,955</td>
</tr>
<tr>
<td>Coastal Rail Corridor</td>
<td>$323,132</td>
</tr>
<tr>
<td>Bus/Rail Infrastructure</td>
<td>$506,843</td>
</tr>
<tr>
<td>Bus/Rail Intermodal Stations</td>
<td>$220,362</td>
</tr>
<tr>
<td>Bus/Rail Vehicle Purchase</td>
<td>$140,670</td>
</tr>
<tr>
<td>Other Bus/Rail (Operations/Planning)</td>
<td>$855,059</td>
</tr>
<tr>
<td></td>
<td>Subtotal: $3,867,275</td>
</tr>
</tbody>
</table>

| BICYCLE FACILITIES PROJECTS | $99,957 |
|                            | Subtotal: $99,957 |

<table>
<thead>
<tr>
<th>TRAFFIC FLOW IMPROVEMENTS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation Management System/Intelligent Transportation System</td>
<td>$62,333</td>
</tr>
<tr>
<td>Traffic Management/Signal Projects</td>
<td>$34,923</td>
</tr>
<tr>
<td></td>
<td>Subtotal: $97,256</td>
</tr>
</tbody>
</table>

**Total Transportation Tactics in 2010 RTIP:** $4,090,087

**Total All Transportation Projects in 2010 RTIP:** $12,259,334

**Share of T-Tactics Projects in 2010 RTIP:** 33%
Table 3-2
2010 RTIP and 2050 Regional Transportation Plan: Our Region. Our Future. Air Quality Conformity Analysis for Eight-Hour Ozone

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Weekday Vehicle Starts (1,000s)</th>
<th>Average Weekday Vehicle Miles (1,000s)</th>
<th>ROG</th>
<th>NOx</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>14,760</td>
<td>85,073</td>
<td>53</td>
<td>26</td>
</tr>
<tr>
<td>2020</td>
<td>14,979</td>
<td>86,155</td>
<td>53</td>
<td>24</td>
</tr>
<tr>
<td>2030</td>
<td>16,396</td>
<td>98,912</td>
<td>53</td>
<td>19</td>
</tr>
<tr>
<td>2040</td>
<td>17,676</td>
<td>107,715</td>
<td>53</td>
<td>18</td>
</tr>
<tr>
<td>2050(1)</td>
<td>18,942</td>
<td>117,825</td>
<td>53</td>
<td>19</td>
</tr>
</tbody>
</table>

(1) The emission data for 2050 was prepared using 2040 emission factors, as emission factors for 2050 are not available. The 2050 RTP air quality conformity analysis was conducted for the years 2011 – 2040. Emissions data for 2050 is included for informational purposes only.

Note: Emissions budgets from Eight Hour Ozone Attainment Plan for San Diego County, found adequate for transportation conformity purposes by the U.S. EPA, effective June 9, 2008.
<table>
<thead>
<tr>
<th>Year</th>
<th>Average Weekday Vehicle Starts (1,000s)</th>
<th>Average Weekday Vehicle Miles (1,000s)</th>
<th>CO SIP Emissions Budget Tons/Day</th>
<th>CO Emissions Tons/Day</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>14,760</td>
<td>85,073</td>
<td>730</td>
<td>231</td>
</tr>
<tr>
<td>2020</td>
<td>14,979</td>
<td>86,115</td>
<td>730</td>
<td>207</td>
</tr>
<tr>
<td>2030</td>
<td>16,396</td>
<td>98,912</td>
<td>730</td>
<td>158</td>
</tr>
<tr>
<td>2040</td>
<td>17,676</td>
<td>107,715</td>
<td>730</td>
<td>144</td>
</tr>
<tr>
<td>2050(2)</td>
<td>18,942</td>
<td>117,825</td>
<td>730</td>
<td>157</td>
</tr>
</tbody>
</table>

(2) The emission data for 2050 was prepared using 2040 emission factors, as emission factors for 2050 are not available. The 2050 RTP air quality conformity analysis was conducted for the years 2011 – 2040. Emissions data for 2050 is included for informational purposes only.

CONCLUSION

Based upon an evaluation of projects and funds programmed and a quantitative emissions analysis, the 2010 RTIP as amended and 2050 RTP meet the U.S. EPA transportation conformity regulations contained within the federal guidelines published on August 15, 1997, and subsequent amendments, as well as the requirements of the federal Clean Air Act amendments of 1990.
Appendix A

PROJECTS EXEMPT FROM AIR QUALITY CONFORMITY DETERMINATION
## APPENDIX A

### PROJECTS EXEMPT FROM AIR QUALITY CONFORMITY DETERMINATION*

<table>
<thead>
<tr>
<th>SAFETY</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>- Railroad/highway crossing.</td>
<td>- Railroad/highway crossing warning devices.</td>
</tr>
<tr>
<td>- Safer non-federal-aid systems roads.</td>
<td>- Guardrails, median barriers, crash cushions.</td>
</tr>
<tr>
<td>- Increasing sight distance.</td>
<td>- Pavement marking demonstration.</td>
</tr>
<tr>
<td>- Traffic control devices and operating assistance other than signalization projects.</td>
<td>- Fencing.</td>
</tr>
<tr>
<td>- Pavement resurfacing and/or rehabilitation.</td>
<td>- Safety roadside rest areas.</td>
</tr>
<tr>
<td>- Emergency relief (23 U.S.C. 125).</td>
<td>- Truck climbing lanes outside the urbanized area.</td>
</tr>
<tr>
<td>- Skid treatments.</td>
<td>- Widening narrow pavements or reconstructing bridges (no additional travel lanes).</td>
</tr>
<tr>
<td>- Adding medians.</td>
<td></td>
</tr>
<tr>
<td>- Lighting improvements.</td>
<td></td>
</tr>
<tr>
<td>- Emergency truck pullovers.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>MASS TRANSIT</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>- Operating assistance to transit agencies.</td>
<td>- Purchase of support vehicles.</td>
</tr>
<tr>
<td>- Rehabilitation of transit vehicles.</td>
<td>- Purchase of office, shop, and operating equipment for existing facilities.</td>
</tr>
<tr>
<td>- Purchase of operating equipment for vehicles (e.g., radios, fareboxes, lifts, etc.).</td>
<td>- Construction or renovation of power, signal, and communications systems.</td>
</tr>
<tr>
<td>- Construction of small passenger shelters and information kiosks.</td>
<td>- Reconstruction or renovation of transit buildings and structures (e.g., rail or bus buildings, storage and maintenance facilities, stations, terminals, and ancillary structures).</td>
</tr>
<tr>
<td>- Rehabilitation or reconstruction of track structures, track, and trackbed in existing rights-of-way.</td>
<td>- Construction of new bus or rail storage/maintenance facilities categorically excluded in 23 CFR part 771.</td>
</tr>
<tr>
<td>- Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of fleet.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>AIR QUALITY</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>- Continuation of ride-sharing and van-pooling promotion activities at current levels.</td>
<td>- Bicycle and pedestrian facilities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OTHER</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>- Specific activities which do not involve or directly lead to construction, such as: Planning and technical studies.</td>
<td>- Engineering to assess social, economic, and environmental effects of the proposed action or alternatives to that action.</td>
</tr>
<tr>
<td>- Grants for training and research programs.</td>
<td>- Noise attenuation.</td>
</tr>
<tr>
<td>- Planning activities conducted pursuant to titles 23 and 49 U.S.C. Federal-aid systems revisions.</td>
<td>- Emergency or hardship advance land acquisitions (23 CFR 710.204(d)).</td>
</tr>
<tr>
<td>- Sign removal.</td>
<td>- Acquisition of scenic easements.</td>
</tr>
<tr>
<td>- Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities).</td>
<td>- Plantings, landscaping, etc.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ALL PROJECTS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>- Intersection channelization projects.</td>
<td>- Intersection signalization projects at individual intersections.</td>
</tr>
<tr>
<td>- Interchange reconfiguration projects.</td>
<td>- Changes in vertical and horizontal alignment.</td>
</tr>
<tr>
<td>- Truck size and weight inspection stations.</td>
<td>- Bus terminal and transfer points.</td>
</tr>
</tbody>
</table>

*Source: Part II Environmental Protection Agency 40 CFR Parts 51 & 93 Transportation Conformity Rule, as amended, July 1, 2004*
Appendix B

GLOSSARY OF TERMS AND ACRONYMS
## Appendix B

### GLOSSARY OF TERMS AND ACRONYMS

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A</strong></td>
<td></td>
</tr>
<tr>
<td>AC</td>
<td>Advanced Construction</td>
</tr>
<tr>
<td>ADA</td>
<td>Americans with Disabilities Act</td>
</tr>
<tr>
<td>ADT</td>
<td>Average Daily Traffic</td>
</tr>
<tr>
<td>APCB</td>
<td>San Diego Air Pollution Control Board</td>
</tr>
<tr>
<td>APCD</td>
<td>San Diego Air Pollution Control District</td>
</tr>
<tr>
<td>ARB</td>
<td>California Air Resources Board</td>
</tr>
<tr>
<td>ARRA</td>
<td>American Recovery and Reinvestment Act</td>
</tr>
<tr>
<td>ATCDF</td>
<td>Average Train Crossing Delay Factor</td>
</tr>
<tr>
<td><strong>B</strong></td>
<td></td>
</tr>
<tr>
<td>BIA</td>
<td>Bureau of Indian Affairs</td>
</tr>
<tr>
<td>BIP</td>
<td>Border Infrastructure Program</td>
</tr>
<tr>
<td>BPWG</td>
<td>Bicycle-Pedestrian Working Group</td>
</tr>
<tr>
<td>BRT</td>
<td>Bus Rapid Transit</td>
</tr>
<tr>
<td>BTA</td>
<td>Bicycle Transportation Account</td>
</tr>
<tr>
<td><strong>C</strong></td>
<td></td>
</tr>
<tr>
<td>CAA</td>
<td>Clean Air Act</td>
</tr>
<tr>
<td>CAAA</td>
<td>1990 Clean Air Act Amendments</td>
</tr>
<tr>
<td>Caltrans</td>
<td>California Department of Transportation</td>
</tr>
<tr>
<td>CARB</td>
<td>California Air Resources Board</td>
</tr>
<tr>
<td>CBI</td>
<td>Corridors and Borders Infrastructure</td>
</tr>
<tr>
<td>CHP</td>
<td>California Highway Patrol</td>
</tr>
<tr>
<td>CI</td>
<td>Capacity Increasing</td>
</tr>
<tr>
<td>CIP</td>
<td>Capital Improvement Program</td>
</tr>
<tr>
<td>CMAQ</td>
<td>Congestion Mitigation and Air Quality Program</td>
</tr>
<tr>
<td>CMIA</td>
<td>Corridor Mobility Improvement Account</td>
</tr>
<tr>
<td>CO</td>
<td>Carbon Monoxide</td>
</tr>
<tr>
<td>CON</td>
<td>Construction Phase</td>
</tr>
<tr>
<td>CPI</td>
<td>Consumer Price Index</td>
</tr>
<tr>
<td>CTAC</td>
<td>Cities/County Transportation Advisory Committee</td>
</tr>
<tr>
<td>CTC</td>
<td>California Transportation Commission</td>
</tr>
<tr>
<td>CTC</td>
<td>Centralized Train Control</td>
</tr>
<tr>
<td>CWG</td>
<td>Conformity Working Group</td>
</tr>
</tbody>
</table>
### D
- **DAR** Direct Access Ramp
- **DEFM** Demographic and Economic Forecasting Model
- **DEMO** Demonstration
- **DOT** U.S. Department of Transportation

### E
- **EAP** Early Action Program
- **EMFAC** EMissions FACtors Model
- **EPA** U.S. Environmental Protection Agency
- **EPSP** Expedited Project Selection Process

### F
- **FE** Fund Estimate
- **FHWA** Federal Highway Administration
- **FR** Federal Register
- **FRA** Federal Railroad Administration
- **FSP** Freeway Service Patrol or FSP Act
- **FSTIP** Federal State Transportation Improvement Program
- **FTA** Federal Transit Administration
- **FTIP** Federal Transportation Improvement Program
- **FWG** Freight Working Group
- **FY** Fiscal Year

### G
- **GARVEE** Grant Anticipation Revenue Vehicle
- **GIS** Geographic Information System

### H
- **HBP** Highway Bridge Program
- **HCD** Housing and Community Development
- **HES** Hazard Elimination Safety
- **HIRE** Hiring Incentives to Restore Employment
- **HOV** High Occupancy Vehicle
- **HPMS** Highway Performance Monitoring System
- **HPP** High Priority Program
- **HRCSA** Highway-Railroad Crossing Safety
- **HRRR** High Risk Rural Roads
- **HSIP** Highway Safety Improvement Program
- **HUD** Housing and Urban Development

### I
- **IIP** Interregional Improvement Program
- **IM** Interstate Maintenance
- **IRR** Indian Reservation Road
- **ITOC** Independent Taxpayer Oversight Committee
- **ITS** Intelligent Transportation System
<table>
<thead>
<tr>
<th>J</th>
<th>JARC</th>
<th>Jobs Access Reverse Commute</th>
</tr>
</thead>
<tbody>
<tr>
<td>J</td>
<td>JTOC</td>
<td>Joint Transportation Operations Center</td>
</tr>
<tr>
<td>L</td>
<td>LOS</td>
<td>Level of Service</td>
</tr>
<tr>
<td></td>
<td>LOSSAN</td>
<td>Los Angeles to San Diego (Rail Corridor Agency)</td>
</tr>
<tr>
<td>M</td>
<td>MPO</td>
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<td>PADT</td>
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<td>R</td>
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<td>Description</td>
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<td>SAFETEA-LU</td>
<td>Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users</td>
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<td>Senate Bill</td>
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<td>Subcommittee for Accessible Transportation</td>
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<td>Transportation T-tactic: Ridesharing</td>
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<td>Transportation T-tactic: Traffic Improvement</td>
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<td>Transportation Development Act</td>
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<td>Transportation Demand Management</td>
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<td>TE</td>
<td>Transportation Enhancement</td>
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<td>TEA-21</td>
<td>Transportation Equity Act for the 21st Century</td>
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<td>TIF</td>
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<td>Transit Investment for Greenhouse Gas Emission Reduction</td>
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<td>TPEC</td>
<td>Transportation Project Evaluation Criteria</td>
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<td>San Diego Region ½ cent Local Transportation Sales Tax Program</td>
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<td>Traffic Systems Management</td>
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<td>UTC</td>
<td>University Town Center</td>
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<tr>
<td>VMT</td>
<td>Vehicle Miles of Travel</td>
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<tr>
<td>VOC</td>
<td>Volatile Organic Compounds</td>
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</table>
Governor’s Executive Order S-3-05
Climate Basis & Implications*

http://www.dot.ca.gov/hq/energy/ExecOrderS-3-05.htm

*There is a moral imperative to achieve S-3-05, regardless of what’s legal

Mike Bullock
mike_bullock@earthlink.net
760-754-8025

S-3-05, Signed in 2005

• GHG Emission Trajectory:
  – 2000 levels by 2010
  – 1990 levels by 2020 (AB 32)
  – 80% below 1990 levels by 2050

• Achieved by Plans & Status
  – Every 2 years
  – For transportation plans
    CALTRANS & CARB → Cal EPA → Governor

If the world achieves these reductions, our levels of atmospheric CO2_e will be capped at 450 PPM. We are at 390 now. The world must stop most burning of fossil fuel by 2050.
Temperature-Change Probabilities Associated with 450 PPM CO2


• Cap of 450 PPM
  – A 50% chance that temp change stays below 2°C
  • 2°C means
    – Loss of 97% of Corral Reefs
    – 1 to 3 Billion (of 7 B) people experience water stress
    – Loss of summer ice at North Pole
    – 58% unstable tundra
  – 30% chance of more than 3°C
  • Exponentially worse than 2°C

James Hanson: Present level of CO2 “already in the dangerous zone” (385 PPM when written)

Our Climate Crisis

• Keeling Curve:
  http://en.wikipedia.org/wiki/An_Inconvenient_Truth#Scientific_basis
Our Climate Crisis

• From: http://en.wikipedia.org/wiki/An_Inconvenient_Truth#Scientific_basis

S-3-05’s goal is to cap CO2_e at 450 PPM

Current Level = 390 PPM

Our Climate Crisis

• Earth & Space Research (ESR) website:
  http://www.esr.org/outreach/climate_change/mans_impact/man1.html

S-3-05’s Goal is to cap CO2 at 450 PPM, which is off this chart.

Current level = 390 PPM
Trajectories to Support Calculations

Purple (Low carbon fuel), Green (C02/Mile), & Gold (S-3-05)

From Communities Tackle Global Warming, A Guide to SB 375 comes the words and plot shown as Figure 1.

In San Diego County, 41% of GHG emissions come from cars and light-duty trucks.

SB 375’s Per-Capita VMT Reduction for 2035, to Support S-3-05

<table>
<thead>
<tr>
<th>Variable Name</th>
<th>Definition</th>
<th>Taken From</th>
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<tbody>
<tr>
<td>f</td>
<td>net factor of the emissions of Greenhouse Gas</td>
<td>Gold Line&lt;sup&gt;1&lt;/sup&gt;</td>
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<tr>
<td>f_Pavley</td>
<td>factor of the average statewide mileage</td>
<td>Green Line&lt;sup&gt;1&lt;/sup&gt;</td>
</tr>
<tr>
<td>f_Fuel</td>
<td>factor of the reduction of GHG due to low-carbon fuels</td>
<td>Purple Line&lt;sup&gt;1&lt;/sup&gt;</td>
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<tr>
<td>f_Population</td>
<td>factor of the population in the region of interest</td>
<td>CARB&lt;sup&gt;2&lt;/sup&gt;</td>
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<tr>
<td>f_PerCapitaVMT</td>
<td>factor of per capita driving</td>
<td>Computed</td>
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</tbody>
</table>

<sup>1</sup>From the Chart constructed by Steve Winkleman, as shown in the “Guide to SB 375” report.


\[
f = f_{\text{PerCapitaVMT}} \times f_{\text{Population}} \times f_{\text{Pavley}} \times f_{\text{Fuel}}
\]

\[
f_{\text{PerCapitaVMT}} = \frac{f}{(f_{\text{Population}} \times f_{\text{Pavley}} \times f_{\text{Fuel}})}
\]
Per-Capita VMT Reduction for 2035, as Required by S-3-05

\[ f_{\text{PerCapitaVMT}} = \frac{f}{(f_{\text{Population}} \times f_{\text{Pavley}} \times f_{\text{Fuel}})} \]

\[ f_{\text{PerCapitaVMT}} = \frac{0.525}{(1.313 \times 0.685 \times 0.9)} \]

\[ f_{\text{PerCapitaVMT}} = 0.649 \]

This is a 35.1% decrease in GHG or VMT.

Because \(0.649 \times 1.313 = 0.8515\), in 2035, the people in San Diego County must drive 15% less than they did in 2005, even with the 31.3% increase in population. \textit{Therefore, why add lanes?}

Strategies to Achieve 35%

- Stop expanding freeways
  - No need, because we must drive less
  - Eliminate congestion with following strategies
- Reallocate freeway expansion funds to transit
- Pricing to increase fairness & choice
  - Parking demonstration projects to unbundle cost
  - State legislation (with SANDAG’s help)
    - Unbundle the cost of all “free” parking
    - Equitable and environmentally-sound road-use fee pricing
- Smart growth, complete streets, bicycle education
21st Century Transportation Solutions

- Redesigned rail or monorail systems
  - Electric, automated, 24/7, frequent service
-Commitment to clean-bus technology
- Equitable driving fees to reduce taxes
- Unbundled car parking cost

S-3-05, Should You Care?

- AG Harris says yes
  - Sept. 16 letter to SANDAG
  - Top of Page 8 and Footnote 21 (Can not ignore!)
- BAAQMD CEQA Air Quality Guidelines
  - “Should consider horizon-year goals consistent with climate stabilization predictions identified in the Governor’s Executive Order S-03-05”
- San Jose has integrated S-03-05 into their General Plan’s CEQA.
- Your plans must achieve 35% for 2035; not 13%
S-3-05, Discussion, 1 of 2

• Supervisor Roberts, on the global nature of issue, at Transportation Committee meeting: We will have little effect; talk to India and China
  – This kind of talk obscures moral responsibility
  – Counter to Golden Rule application*
  – Our responsibility is to do our part and thereby set a good (not a bad) example

*Emit GHG into the atmosphere (do onto others), as you would have them emit GHG into the atmosphere (as you would have them do unto you)

S-3-05, Discussion, 2 of 2

• SANDAG attacks on the AG letter
  – Chairman Stocks: She is the “top cop” not the “top regulator”
  – Board Member Downey, claiming that a reference was misrepresented (“We are not bad actors.”)
    • Irrelevant to primary thrust and misleading, in that such details are not the point
  – Board Member Downey, stating that letter does not allege laws were broken
    • Irrelevant and misleading

Letter states that the Plan does not meet CEQA. How could a DEIR break a law anyway?
S-3-05, Discussion, 2 of 2

• Board Member Downey, at the Transportation Committee meeting: “Mr. Bullock doesn’t understand that we can’t do what he asks until the technology is developed”
  – Pricing technology can be quickly developed if government shows an interest
  – Put such strategies into your Alternative Planning Strategy (APS) is OK
  – S-3-05 allows time to develop and implement
  – S-3-05 will remain violated, without such work

San Diego County Voter Preference

• Opinion poll of San Diego County Voters
  – Fairbank, Maslin Maullin, Metz & Associates
  – Sept 14, 2010

  Preference, Between Expanding Transit or Roads & Highways

<table>
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<tr>
<th>Option</th>
<th>Percentage</th>
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<td>Expanding public transit, including buses and rail</td>
<td>55%</td>
</tr>
<tr>
<td>Expanding roads and highways</td>
<td>32%</td>
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<tr>
<td>Both, neither, don’t know</td>
<td>13%</td>
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</tbody>
</table>
September 16, 2011

Honorable Jerome Stocks  
Chair, Board of Directors  
San Diego Association of Governments  
401 B Street, Suite 700  
San Diego, CA 92101

RE: **Draft Environmental Impact Report for 2050 Regional Transportation Plan and Sustainable Communities Strategy**

Dear Chairman Stocks and Honorable Members of the Board:

Attorney General Kamala D. Harris submits the following comments on the Draft Environmental Impact Report (DEIR) prepared for the San Diego Association of Governments’ (SANDAG) 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).\(^1\) While we recognize the difficulty of SANDAG’s task – to prepare the first SCS in the State as required by SB 375\(^2\) – our review of the DEIR for the RTP/SCS has revealed some significant legal problems, as set forth below. We believe that SANDAG has the ability to correct these problems and improve the RTP/SCS, which will benefit not only the San Diego region, but will help to set the standard for other Metropolitan Planning Organizations across California.

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\(^1\) The Attorney General submits these comments pursuant to her independent power and duty to protect the environment and natural resources of the State from pollution, impairment, or destruction, and in furtherance of the public interest. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; *D’Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d 1, 14-15.) This letter is not intended, and should not be construed, as an exhaustive discussion of the DEIR’s compliance with the California Environmental Quality Act (CEQA).  

\(^2\) Senate Bill 375 (Chapter 728, Statutes of 2008).
Localized Air Pollution

The SANDAG region has some of the most serious local air quality problems in the State and the nation – in substantial part caused by vehicle emissions. The harm from these pollutants is not necessarily distributed equally throughout the region, but may be more concentrated in communities immediately adjacent to large-scale industrial and commercial development and major transportation corridors, and may more particularly affect certain segments of the population. As discussed below, our review of the DEIR indicates that SANDAG has set too low a bar for determining whether the air quality impacts of its RTP/SCS are significant, and, further, has failed to analyze the impacts of projected increases in pollution on communities that are sensitive or already overburdened with pollution, in violation of CEQA.

Background: Pollutants of Concern in the San Diego Air Basin

It is well established that “[t]he significance of an activity depends upon the setting.” (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 718 [citing Cal. Code Regs., tit. 14, § 15064, subd. (b)]; see also id. at 721.) Accordingly, the significance of any added pollutant emissions must be judged in the context of an air basin that already exceeds health-based federal air quality standards. (See ibid.) The San Diego area was ranked by the American Lung Association this year as having the seventh worst ozone problem, and the fifteenth worst particulate pollution problem, in the nation.3 Pollutants of concern in the San Diego air basin include ozone, the chemical commonly called “smog,” which may permanently decrease lung function,4 and particulate matter, which impairs lung function and can exacerbate asthma. Small particulate matter (2.5 microns in size or less), a component of diesel exhaust, is of particular concern, because it can penetrate deeply into the lungs, bypassing the body’s defenses, and can carry carcinogens on the surface of the particles.

The seriousness of the localized air pollution problem as it exists today in the region can hardly be overstated. The area exceeded the health-based federal ozone standard on 24 days in 2009, and it exceeded the federal particulate standard on 4 days. The basin exceeded the more stringent California standard for ozone on 127 days in 2009, and the fine-particulate standard on 78 days. The area has a history of failing to meet applicable air quality objectives. The San Diego Air Pollution Control District (APCD) stated in its 2009 Regional Air Quality Strategy (RAQS) that it has not consistently met the Health and Safety Code’s 5% per year ozone reduction target during any year during the 2003-2006 time period, and that the APCD expects reductions of only about 3% per year during the 2006-2009 time period. (San Diego APCD 2009-RAQS, p. 2.)

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4 Gauderman, et al., The Effects of Air Pollution on Lung Development from 10 to 18 Years of Age (Sept. 9, 2004) 351 The New England Journal of Medicine 1057-1068.
SANDAG’s Focus on “Conformity” with the State Air Pollution Plans Fails Adequately to Address the Region’s Serious Air Quality Problems.

Where an area exceeds federal air quality standards for air pollutants, federal law allows funding of the individual transportation projects listed in an RTP only if the RTP “conforms” to a federally approved state plan to meet those federal standards. The DEIR’s analysis of whether localized air pollution resulting from the RTP/SCS is significant under CEQA focuses almost exclusively on whether such conformity is achieved. There are significant problems with this limited approach, which substitutes a determination of whether certain federal laws are met for SANDAG’s obligation under CEQA to conduct a thorough analysis of the actual effects on the air and on public health that will result from the addition of the many hundreds of miles of highway expansion and extensions that are in the RTP/SCS.

California’s most recent federally approved plan was prepared in 2007, and therefore does not reflect current conditions. The DEIR acknowledges that the federal EPA is expected to soon reclassify the San Diego Air Basin as in “serious” nonattainment of the federal ozone standard, a designation that requires attainment of the federal standard by June of 2013. (DEIR, p. 4.3-6.) Demonstrating conformity with the 2007 plan emissions budgets does not, by itself, show that relevant health effects created by the new pollution generated by the RTP/SCS have been analyzed and disclosed, or even that the relevant federal standards will be met. Instead, EPA’s reclassification of the air basin as having worse air quality, and the imposition of such a short deadline for meeting the federal ozone standard, indicates a more serious air pollution problem that may require more stringent control measures to protect the public health.5

In addition, the DEIR fails to analyze whether the California standard for ozone, more stringent than the federal standard, will be met during the life of the RTP/SCS, or what the RTP/SCS’s contribution to current or future violations of that standard will be. The DEIR appears to rely solely on the RAQS to meet the state ozone standard. (See DEIR at p. 4.3-29-30.) Yet, as noted, the region has not consistently met the RAQS 5% per year ozone reduction target. The fact that U.S. EPA is expected to reclassify the Basin as in “serious” nonattainment of the less stringent federal ozone standard would indicate that the RAQS standards have not been enough to prevent deteriorating air quality. Thus, any assumption that the RAQS will consistently achieve the 5% reduction target in the future is unsupported, and any assertion that the RAQS will attain the state ozone standard at a time certain unfounded. A full analysis is

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5 Even if conformity with federal standards in state-approved plans were an appropriate benchmark for significance under CEQA, the DEIR does not contain a quantitative analysis, using the most recent available air quality measurements as the baseline, to determine whether the federal air quality standards will actually be met, and what the public health consequences would be of adding the expected pollutant load from the RTP/SCS to existing conditions. (DEIR, at p. 4.3-14.)
needed to show that the emissions caused by the RTP/SCS at different time points during its life will not contribute significantly to violations of the state ozone standard in the San Diego Air Basin.

SANDAG Has Failed Adequately to Address Impacts to Public Health and Communities Already Burdened with Pollution.

We commend SANDAG for including in its DEIR a chapter entitled “Environmental Justice.” (DEIR, ch. 4.06.) That section appears to focus primarily on the RTP/SCS’s effect on access to transit by traditionally underserved communities. SANDAG has, however, failed to analyze other equally, if not more, significant effects of the RTP/SCS on communities currently experiencing environmental injustice. The principal omission of the DEIR is the lack of any discussion of the impacts of the increased air pollution that will result from carrying out the RTP/SCS on communities already severely impacted by air pollution. As noted, CEQA requires that the significance of environmental impacts be considered in context. (Kings County Farm Bureau, supra, 221 Cal.App.3d at 718.) Such context may appropriately include (1) whether the region includes communities or subpopulations that may be particularly sensitive to increases in pollution; and (2) whether such communities or groups are already at or near their capacity to bear any additional pollution burden.

The DEIR does not identify whether the area affected by the RTP/SCS includes particularly sensitive communities that will be affected disproportionately by the acknowledged increase in pollution. “[A] number of studies have reported increased sensitivity to pollution, for communities with low income levels, low education levels, and other biological and social factors. This combination of multiple pollutants and increased sensitivity in these communities can result in a higher cumulative pollution impact.” (Office of Environmental Health Hazard Assessment, Cumulative Impacts: Building a Scientific Foundation (Dec. 2010), Exec. Summary at p. ix.)

Research in other parts of California has shown that disadvantaged and minority communities are often exposed to unhealthful air more frequently and at higher levels than other groups. Identifying these communities is an essential part of describing the relevant CEQA setting.

Once such communities are identified, SANDAG must analyze how the health of the residents in these communities would be expected to be particularly affected. As discussed, residents already are experiencing serious air pollution that is impacting health and welfare, and it is reasonable to assume that these effects currently are more concentrated in certain areas of the region, for example, in communities adjacent to large-scale industrial or commercial operations or transportation corridors used by heavy-duty trucks. In addition, viewed at the individual community scale, there may be synergistic adverse effects. For example, research

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6 Available at http://oehha.ca.gov/ce/cipa123110.html.
7 Hall and Brajer, The Benefits of Meeting Federal Clean Air Standards in the South Coast and San Joaquin Valley Air Basins (2008) at 22-23.
has shown that increases in greenhouse gas emissions may result in localized ozone increases; such increases have been observed in California.\(^8\)

We believe that particulate pollution may be of special concern to already burdened communities. As discussed, diesel particulate emissions have serious health effects, since they impact respiratory function and can exacerbate asthma. Further, diesel particulates are known to the State of California to cause cancer,\(^9\) and have been listed by the Air Resources Board (ARB) as a toxic air contaminant.\(^10\) The DEIR shows that particulate matter pollution will increase over the life of the RTP/SCS. (DEIR, Table 4.3-5, p. 4.3-25.) It also reports that the ARB estimated in 2000 — over a decade ago — that a subset of particulate pollution, fine particulates emitted by diesel vehicles, created an additional cancer risk of 720 cancer cases per one million persons exposed in the San Diego Air Basin. (DEIR, p. 4.3-8.) For comparison purposes, a private business must provide a warning if it exposes individuals to a chemical that poses an increased cancer risk of ten cases in one million people exposed. (Cal. Code Regs., tit. 27, § 25703(b).)

Despite this high cancer risk, and the DEIR’s own recognition that particulate pollution will increase over the life of the RTP/SCS, the DEIR does not analyze what public health effects the increase in particulate matter will cause. Nor does it estimate what portion of the increase in particulate pollution will be carcinogenic diesel particulate matter, and disclose the public health effects that increase may cause. Such an analysis is required under CEQA, so that both the decision maker and the public can know the full consequences of the decision being made. (Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184, 1219-1220.) We are especially concerned that no analysis is presented either of the current risk from particulate pollution, nor of the impact of the projected increase in particulate pollution, on already overburdened or sensitive communities. Given the increase in particulate emissions shown in the DEIR, given the emphasis in the RTP/SCS on the Goods Movement Strategy for the San Diego region (RTP/SCS, Chapter 6), and given the DEIR’s recognition that much of this goods movement will be accomplished by diesel trucks (DEIR, p. 4-16-8; see, also, RTP/SCS, Tech. Appdx. 4, p. 4 [estimating that roads and truckways will carry 90% by volume of goods through the region]), it is incumbent on SANDAG to fully analyze the public health consequences of the RTP/SCS in general, and of the Goods Movement Strategy, in particular.\(^11\)

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\(^8\) Jacobson, *Enhancement of Local Air Pollution by Urban CO2 Domes* (2010) Environ. Sci. Technol. 2497-2502. This phenomenon is of concern because, as discussed, under the RTP/SCS, vehicle miles travelled (VMT) trends up as the total number of vehicles on the road increases. (DEIR, pp. 4.12-16, 4.12-21, 4.12-24; contrast with Table TA 3.1, showing an overall decrease of 1% in VMT by 2050.) Increases in VMT cause increased emissions of greenhouse gases, which may in turn exacerbate localized pollution.

\(^9\) Cal. Code Regs., tit. 27, § 27001.


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The goal of an RTP/SCS is a sustainable community, and no community can be sustainable unless its public health is protected. Thus, while the inclusion of a separate chapter of the DEIR on environmental justice is commendable, the current analysis is deficient, and should be redone and expanded to disclose the full scope of the air pollution and public health consequences of the RTP/SCS, and to propose mitigation measures for those consequences that are proportional to the seriousness of the impacts. (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal.4th 341, 361-62.) We would be happy to work with SANDAG in making this part of the DEIR more meaningful.

SANDAG Has Failed Adequately to Consider Feasible Mitigation for Localized Air Quality Impacts.

Although it finds the RTP/SCS’s impacts on localized air pollution to be significant, the DEIR proposes almost no mitigation measures to reduce or offset these impacts. Instead, the DEIR states that “mitigation measures at the program level is [sic] infeasible” for ozone precursors and carbon monoxide, and defers all mitigation for these pollutants to individual project-level CEQA processes. (DEIR, pp. 4.3-46, 4.3-47, 4.3-48.) CEQA requires that project changes or mitigation either be adopted or shown through substantial evidence to be infeasible; the DEIR, however, does not make such a showing.

The DEIR offers virtually no evidence that program-level mitigation is actually infeasible, and the mitigation measures it does propose lack certainty and are incomplete. For example, compliance with future local land use plans (the scope of which is not now known) is identified as the only feasible mitigation for ozone-related impacts. (DEIR, p. 4.3-48.) Mitigation for fine particulate matter is not discussed separately from mitigation for coarse particulates, despite their different sizes, health impacts, and sources. The dust control measures in the DEIR are not shown to be effective against fine particulates, which come more from industrial processes and fuel combustion than from ground disturbance. The DEIR’s treatment of mitigation for conventional air pollution does not comply with CEQA’s substantive mandate to mitigate all significant impacts. (Pub. Resources Code, §§ 21002, 21081(a).)

It is vital for the health of the San Diego region’s public that all feasible mitigation be adopted and carried out to prevent further deterioration of the already unhealthy air, and it is also vital for the region’s economy. Research shows consistently that the costs of reducing pollution are far outweighed by clean-air benefits such as increased worker productivity, increased agricultural outputs, and reductions in mortality and illness that result from cleaner air.¹² The research cited above -- finding minority communities more severely affected by air pollution -- also calculated the significant costs associated with polluted air in other air basins. Costs ranged

¹² On a nationwide basis, the Office of Management and Budget has estimated that the benefits of clean air regulations outweigh the costs by a ratio of about four to one. OMB, “Informing Regulatory Decisions: 2003 Report to Congress on the Costs and Benefits of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities.”
from $1,250 per person per year in the South Coast Air Basin to $1,600 per person per year in the San Joaquin Valley Air Basin, due to increased health care costs and emergency room visits, missed work and school days, and even premature deaths.\textsuperscript{13} CEQA mandates that SANDAG improve its analysis of the feasibility of localized air pollution mitigation, and the economic benefits of cleaner air and healthier communities must be considered in the feasibility calculus.

\textbf{Climate Change Impacts: Greenhouse Gas Emissions}

Before discussing the DEIR’s treatment of GHG emissions, it is important first to establish the relevant context for evaluating significance. The climate is affected by the concentration of GHGs in the atmosphere. The concentration of carbon dioxide, the primary GHG, has increased from approximately 280 parts per million (ppm) in pre-industrial times to well over 380 ppm, according to the National Oceanic and Atmospheric Administration’s (NOAA) Earth Systems Research Laboratory.\textsuperscript{14} Almost all of the increase is due to human activities (such as fossil fuel use).\textsuperscript{15} The current rate of increase in carbon dioxide concentrations is about 1.9 ppm/year; present carbon dioxide concentrations are higher than any time in at least the last 650,000 years.\textsuperscript{16} GHGs persist in the atmosphere for decades and in some cases millennia.\textsuperscript{17}

The atmosphere and the oceans are reaching their capacity to absorb GHGs without significantly (and perhaps abruptly) changing the Earth’s climate. California is already seeing the effects of climate change. As the Resources Agency observed in its 2009 report, we already are experiencing sea level rise, coastal erosion, increased average temperatures, more extreme hot days and increased heat waves, fewer shifts in the water cycle, and increases in the frequency and intensity of wildfires. (Resources Agency, 2009 \textit{Climate Adaptation Strategy} at p. 3.)\textsuperscript{18} These effects are expected to increase with rising GHG levels in the atmosphere.

The burdens of climate change will not be shared equally. Future climate scenarios are expected to disproportionately affect, for example, the urban poor, the elderly and children, traditional societies, agricultural workers and rural populations. (Office of Environmental Health Hazard Assessment, \textit{Indicators of Climate Change in California: Environmental Justice Impacts} (Dec. 2010) at p. 2.)\textsuperscript{19}

\begin{itemize}
\item \textsuperscript{13} Hall and Brajer, at 5.
\item \textsuperscript{14} See http://www.epa.gov/climatechange/science/recentac.html.
\item \textsuperscript{15} Id.
\item \textsuperscript{16} Id.
\item \textsuperscript{18} Available at http://www.climatechange.ca.gov/adaptation/
\item \textsuperscript{19} Available at http://oehha.ca.gov/multimedia/epic/epic123110.html.
\end{itemize}
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In order to stabilize the climate and avoid the most catastrophic outcomes of climate change, we must substantially reduce our annual GHG emissions over time, achieving a low-carbon future by midcentury. California has memorialized this overarching environmental objective in law. Under AB 32\(^2\), by 2020, California must reduce its total statewide greenhouse gas emissions to the level they were in 1990. (Health & Saf. Code, \(\S\) 38550). To achieve AB 32’s 2020 target, total statewide greenhouse gas emissions must be reduced by approximately 15 percent from current (2008) levels. AB 32 implements Executive Order S-03-05 (2005),\(^{21}\) which set the statewide 2020 target as an interim step to reducing statewide emission levels, by 2050, to 80 percent below 1990 levels. “The 2020 goal was established to be an aggressive, but achievable, mid-term target, and the 2050 greenhouse gas emissions reduction goal represents the level scientists believe is necessary to reach levels that will stabilize climate.” (Air Resources Board (ARB), Scoping Plan at p. 4.)\(^{22}\)

The emissions reductions required to reach our statewide climate objective are substantial. In the longer term, we must reduce our total GHG emissions by approximately four percent per year between 2020 and 2030, and our per capita emissions by slightly less than five percent per year during the 2020 to 2030 period, with continued reductions required through midcentury. (These reductions required are graphically illustrated by the chart from ARB’s Scoping Plan, attached to this letter as Exhibit A.) One of the prime objectives of SB 375, a law supporting and complementary to AB 32, and of the requirement for Sustainable Communities Strategies, is to create a long-term downward trajectory for GHG emissions in California through transportation and land use strategies.

Given the seriousness of the climate change problem, and the enormity of our GHG reduction task, we are greatly concerned that, when viewed in context, the RTP/SCS seems to be setting the region on a course that is inconsistent with the State’s climate objectives. Specifically, per capita GHG emissions from cars and light-duty trucks increase as compared to the previous year after 2020 (see RTP, Table 301 at p. 3-3), while AB 32 requires that we must aggressively and steadily reduce total per capita GHG emissions during this time period. (See Exhibit A.) Moreover, the total number of vehicle miles travelled (VMT) driven in the San Diego region will steadily increase over the life of the RTP/SCS over the 2010 baseline by 10%, 32%, and 51% in 2020, 2035, and 2050, respectively. (DEIR, pp. 4.12-16, 4.12-21, 4.12-24;

\(^{20}\) Cal. Health and Safety Code, \(\S\) 38,500, \textit{et seq.}  
\(^{21}\) The DEIR states that the Executive Order “does not constitute a ‘plan’ for GHG reduction, and no state plan has been adopted to achieve the 2050 goal.” (DEIR, pp. 4.8-29 to 4.8-30.) The DEIR therefore does not find the RTP/SCS’s failure to meet the Executive Order’s goals to be a significant impact. This position fails to recognize that Executive Order S-3-05 is an official policy of the State of California, established by a gubernatorial order in 2005, and designed to meet the environmental objective that is relevant under CEQA (climate stabilization). SANDAG thus cannot simply ignore it.  
\(^{22}\) Available at http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. The Scoping Plan was readopted by ARB on August 24, 2011.
contrast with Table TA 3.1.) Under the most optimistic figures presented in the DEIR, total VMT will drop only 1% over current levels by 2050. Moreover, the DEIR predicts that the 14.33 million metric tons of greenhouse gases (expressed as MMT of carbon dioxide equivalent) emitted by cars and light duty trucks in 2010 (DEIR, p. 4.8-5) will fall to 12.04 MMT in 2020 (DEIR, p. 4.8-20), based largely on statewide tailpipe and fuel standards, but will then begin rising again, to 12.94 MMT in 2035 and 14.74 MMT in 2050. (DEIR, pp. 4.8-23, 4.8-25, respectively.) Thus, although SANDAG will meet the SB 375 goals for per capita GHG targets for cars and trucks set for it by ARB in 2020 and 2035, the DEIR shows that total GHG emissions from cars and light-duty trucks in 2050 will increase over the 2010 emissions level.

The DEIR finds the impact of the RTP/SCS on GHG emissions to be not significant in 2020 (DEIR, p. 4.8-20), significant in 2035 (DEIR, p. 4.8-23), and significant in 2050 (DEIR, p. 4.8-25). SANDAG must, however, make a determination whether the project as a whole has significant climate change impacts. We believe strongly that it does. What the DEIR shows is that the suite of strategies relied on by SANDAG, which include a heavy reliance on roadway expansion projects, does not deliver GHG reductions that are sustainable in the long term. In fact, infrastructure and land use decisions made in the early years of the RTP/SCS may lock in transportation inefficiencies and preclude any realistic possibility of meeting the Executive Order’s goal of an 80% reduction in GHG emissions. The DEIR states that “[t]otal land-use based GHG emissions in 2050 are projected to be 21.85 MMT CO2e, or 50 percent greater than GHG emissions in 2010 (Table 4.8-11).” (DEIR at p. 4.8-24.) The DEIR should address the impact of the draft RTP/SCS on this important long-term policy in greater detail.

The DEIR is legally deficient for the additional reason that it does not analyze potential changes to the project design or specific mitigation measures for the GHG emissions impacts from land use; it makes only a generalized promise to prepare future RTPs “to incorporate policies and measures that lead to reduced GHG emissions.” (DEIR, p. 4.8-35.) Further, the DEIR proposes some mitigation measures for GHG emissions attributable to transportation, but does not include any transportation mitigation that relates to land use, nor does it show that any such measures would be infeasible. We believe that CEQA requires much more analysis of potential mitigation measures, and that postponing this discussion and analysis until future RTP/SCS’s and individual projects is a violation of CEQA’s substantive provisions. (Public Res. Code §§ 21002, 21081(a); see Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 89-96.) SANDAG has the authority to approve the RTP/SCS even if it will have substantial environmental impacts, and CEQA will not second-guess the wisdom of that choice, so long as substantial evidence supports SANDAG’s findings. (Public Res. Code § 21081(b).) However, SANDAG may not approve an environmentally damaging project until and unless it has adopted all feasible mitigation measures or shown that further mitigation – including land use mitigation – is infeasible. The DEIR does not yet do so.

We recognize that this is the first SCS prepared in California, and that SANDAG is charting new territory. However, the legal requirements of CEQA, including the requirement to mitigate significant impacts to the extent feasible, are not satisfied simply because the RTP/SCS meets the targets contained in SB 375 for 2020 and 2035. CEQA demands a full analysis and all
feasible mitigation of every significant impact resulting from the implementation of the RTP/SCS, throughout the full life of the Plan. The DEIR does not now provide this for GHG emissions.

**Comments on RTP/SCS**

Although we are not commenting directly on the legal adequacy of the RTP/SCS under SB 375, we concur in the comments submitted to SANDAG by the California Office of Planning and Research (OPR). As discussed above, we are particularly concerned that per capita greenhouse gas (GHG) emissions associated with cars and light-duty trucks (and associated co-pollutants like particulate matter) begin to rise after 2020. (See OPR comment letter at pp. 3-4; Draft RTP at p. 3-3, Table 3.1; see also DEIR at Tables 4.3-5, p. 4.3-25.) As OPR notes, this “implies that future growth will be unavoidably less transportation efficient, which counters SB 375’s underlying purpose.” (OPR comment letter at p. 3.) If the RTP/SCS in fact runs counter to SB 375’s purpose to reduce transportation-related GHG emissions over time, this would bear on whether the effects of the plan should be considered significant under CEQA.

In addition, OPR’s comments discuss a failure of the DEIR and RTP/SCS to fully disclose the methodology by which VMT was projected, making it difficult or impossible for the lay public to determine for itself whether the information presented in the two documents is accurate and supported by substantial evidence. This lack of transparency is also a crucial flaw under CEQA, a statute whose purposes include accountability as to governmental decisions that affect the environment. (*Laurel Heights Improvement Ass'n v. Regents of the University of California* (1989) 47 Cal.3d 376, 392 [holding that “the EIR . . . is a document of accountability” for the public officials who certify it].)

**Conclusion**

We appreciate the difficulty of preparing the first SCS in California. We believe that SANDAG has not yet prepared a DEIR on the RTP/SCS that fully satisfies CEQA’s requirements, and urge SANDAG to redo several parts of the DEIR, as described in our comments herein. This RTP/SCS presents SANDAG with an opportunity to integrate transportation and land-use planning in a way that reduces GHG emissions and harmful air pollution, and that produces other benefits such as increased mobility and better public health for all the region’s residents, particularly its sensitive and already overburdened communities. We
would be happy to work with SANDAG to take the additional steps needed to take full advantage of this opportunity. We appreciate your consideration of our comments.

Sincerely,

Timothy R. Patterson
Supervising Deputy Attorney General

SUSAN DURBIN
Deputy Attorney General

For KAMALA D. HARRIS
Attorney General

cc: Gary Gallegos, Executive Director, San Diego Association of Governments
    Julie D. Wiley, General Counsel, San Diego Association of Governments

Attachment
EXHIBIT A

Emissions Trajectory Towards 2050

(ARB, Scoping Plan, Figure 6, at p. 118.)
SANDAG Long-Term Debt Portfolio

2008 Variable Rate Bonds ($600 million; 30 year maturity)
2010 Fixed Rate Bonds ($350 million; 38 year maturity)

3.89%
Planning for a sustainable future

- Provide more transportation choices through an integrated system
- Preserve natural resources and promote smart growth
- Maximize investments and meet funding challenges
Integrated transportation system

Natural resources and smart growth
Investments and funding

Regional Results: Population, Jobs, Housing
2050 Transit Network

2050 Highway Network
Offering More Travel Choices

Reduce Demand
Maximize Technology

Reduce greenhouse gas emissions

<table>
<thead>
<tr>
<th>Target Year</th>
<th>CARB Target</th>
<th>2050 RTP/SCS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>7%</td>
<td>14%</td>
</tr>
<tr>
<td>2035</td>
<td>13%</td>
<td>13%</td>
</tr>
</tbody>
</table>

Per Capita Reductions from 2005 (26 lbs/person)
New or Updated 2050 RTP/SCS Actions

- Evaluate alternative land use scenarios as part of Regional Comprehensive Plan update
- Develop early action program for active transportation
- Develop transit oriented development policy
- Continue to enhance travel demand model
- Develop complete streets policy

Paying for the Plan

- Based on current and reasonably available funding sources
- $213.8 billion in total revenues phased through 2050 (in year of expenditure)
Projected Revenues
($ Billions in year of expenditure)

$213.8 Billion

- 2010-2020 Revenues
- 2021-2030 Revenues
- 2031-2040 Revenues
- 2041-2050 Revenues

Phased Projects & Programs
($ in year of expenditure)

- Active Transportation, Local Streets, Smart Growth, and TDM/TSM
- Managed Lanes/Highway
- Transit
Social Equity

- Variety of communities and stakeholders involved
- Essential to economic sustainability
- More robust analysis

From the ground up

- Public Workshops and Public Hearings
- Notices, advertising, media relations
- RTP Video
- Envision 2050 Visualization Tool
- E-mail notifications
- Social media
- Partnerships to extend awareness
- Multiple choices for public to comment on 2050 RTP/SCS
Final EIR

- Draft EIR circulated for 55-day public comment period
- 18 comment letters received
- 4 additional letters submitted after comment period
- Responses to all 22 letters included in Final EIR Appendix G

Comments focused on several issues:
- Greenhouse gas emissions – legal requirements, impacts, and mitigation measures
- Range of EIR alternatives
- Project funding and TransNet

Final EIR includes Master Responses and individual responses
Final EIR includes additional language to address public comments
Final EIR

- Three attachments related to the EIR
  - Findings for every significant impact and alternative in the EIR
  - Statement of Overriding Considerations that impacts of 2050 RTP/SCS are outweighed by the benefits
  - Mitigation Monitoring and Reporting Program to ensure compliance with identified mitigation measures

2050 RTP/SCS...

- Meets state greenhouse gas reduction targets
- $214 billion in transportation investments planned
- Preserves more than half of our land as open space
- Provides 156 miles of new trolley service including a new downtown trolley tunnel
- Doubles transit miles with increased frequencies
- $4.4 billion annually in projected regional economic output
- Creates 35,600 jobs per year in the San Diego region
- $3.8 billion for regional and local bicycle and pedestrian projects and programs
- Accommodates housing to meet projected growth
1. Approve Resolution No. 2012-08 certifying that the Final Environmental Impact Report (EIR) for the 2050 San Diego Regional Transportation Plan (2050 RTP) has been completed in compliance with the California Environmental Quality Act (Public Resource Code §21000 et seq., “CEQA”), that the Final EIR was presented to and reviewed and considered by the Board of Directors prior to approving the Project, and that the Final EIR represents the independent judgment and analysis of SANDAG, and adopting the Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program;

2. Find the 2050 RTP Revenue Constrained Plan in conformance with the State Implementation Plans for air quality;
Recommendations

3. Find that the 2050 RTP and its Sustainable Communities Strategy (SCS) meet the greenhouse gas reduction targets established by the California Air Resources Board; and

4. Approve Resolution No. 2012-09 adopting the air quality conformity determination, finding that the SCS achieves the greenhouse gas reduction targets established by the CARB, and meets the requirements established by Senate Bill 375 (Steinberg, 2008) as codified in Government Code §65080(b) et seq., and adopting the 2050 RTP, including its SCS, and the Final 2050 Regional Growth Forecast.
TO: Board of Directors

FROM: SANDAG Staff

SUBJECT: Materials on 2050 Regional Transportation Plan/Sustainable Communities Strategy Submitted after the Close of the Comment Period

Attached to this memorandum are copies of new letters, e-mails, and a transcribed phone message that were submitted to SANDAG after the close of the Draft 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Draft Environmental Impact Report (EIR) public comment periods.

Four comment letters on the Draft EIR submitted after the close of the public comment period, but before the comments and responses (Appendix G to the Draft EIR) were submitted for copying and binding were included and responded to in the Final EIR. Several additional late letters have already been transmitted to you and were distributed at previous SANDAG Board of Directors meetings, and/or Transportation Committee meetings. These previously-transmitted letters are as follows:

- Antonio Diaz, California Environmental Justice Alliance, October 5, 2011
- Diane Takvorian, Environmental Health Coalition, September 27, 2011
- Dennis Ridz, Torrey Pines Community Planning Board, September 28, 2011

The attached new letters, e-mails, and transcribed phone message not previously transmitted have been submitted by:

- Mary Nichols, Air Resources Board, October 20, 2011
- Debra Kelley, American Lung Association in California, October 26, 2011
- Michael H. Zischke, California Building Industry Association and California Business Properties Association, October 26, 2011
- Noel Spaid, I-5 PLAGUE, October 19, 2011
- Amanda Eaken, Natural Resources Defense Council, Elyse Lowe, Move San Diego, Stuart Cohen, Transform, Dan Silver, Endangered Habitats League, October 24, 2011
- Lorena Gonzalez, San Diego and Imperial Counties Labor Council, October 26, 2011
- Pamela Epstein, Sierra Club, October 14, 2011
• Stefanie Sekich-Quinn, Surfrider Foundation, October 26, 2011
• Bianca Alvardo, October 26, 2011
• Michael Bailey, October 25, 2011
• Walt Brewer, October 24, 2011
• Jay Corrales, October 26, 2011
• Bonnie and Joe Cucera, October 24, 2011
• Masada Disehouse, October 24, 2011
• T. Todd Elvins, October 25, 2011
• Daria Flores, October 25, 2011
• Derek Gendvil, October 25, 2011
• Diane Janssen, October 21, 2011
• Donna Jones, October 26, 2011
• Valerie Kosheleff, October 25, 2011
• Claire McGreal, October 24, 2011
• Shannon Milhaupt, October 26, 2011
• Samantha Ollinger, October 25, 2011
• Keith Pezzoli, October 21, 2011
• Lee Schwall, October 25, 2011
• Nadine Scott, October 25, 2011
• Mr. & Ms. S. N. Shafi, October 26, 2011
• Bob Silvern, October 26, 2011
• Ryan Simmellink, October 24, 2011
• Amanda Sousa, October 25, 2011
• Maureen Sweeney, October 24, 2011
• Lynn Wade and Michael Bufalry, October 24, 2011
• Dianne Yee, October 24, 2011

Most of the letters, e-mails, or the transcribed phone message listed in this memorandum do not raise new substantive issues that have not already been addressed in responses to previously submitted comments on the 2050 RTP/SCS and/or the EIR. SANDAG has provided the following responses to the other comments below.

Specifically, the attached comments submitted by the Sierra Club state that comments on the Draft 2050 RTP/SCS addressing environmental impacts are “comments on the interdependent DEIR requiring a response in the FEIR” (Sierra Club letter p. 1). There is no legal authority for this assertion. Comments on the Draft EIR must be submitted to SANDAG as such. Many commenters submitted separate comment letters on Draft EIR and Draft 2050 RTP/SCS, recognizing the distinction between the documents, including the Sierra Club, which submitted comments during both the 2050 RTP/SCS comment period and the Draft EIR comment period.

The Sierra Club further asserts that the 2050 RTP/SCS “front loads” highway projects over transit projects. It should be noted that the 2050 RTP/SCS allocated more funding toward transit projects than highway projects in each decade of the plan. Further, the entire plan is “back loaded,” with 58 percent of the funding becoming available after 2035. This is true of both transit and highway funding. As is stated in the responses to public comments, SANDAG cannot advance funding that is allocated and phased through the state and federal government.
The Sierra Club continues to have concerns about greenhouse gas (GHG) emissions that will result from the 2050 RTP/SCS. SANDAG has explained the conservative approach used to calculate GHG emissions. As further evidence of this, the EIR did not include in the GHG calculations recently announced new fuel efficiency and GHG standards for model year 2014-2018 medium and heavy-duty trucks. The new requirements (see 76 Federal Register 57106, September 15, 2011) vary depending on the type of work the trucks perform, and whether they are diesel or gasoline vehicles. By 2018, average per vehicle reduction in GHG emissions would be 17 percent for diesel vehicles and 12 percent for gasoline vehicles; average per vehicle fuel efficiency improvements would be 15 percent and 10 percent, respectively. The new truck standards would reduce emissions of both GHGs and criteria pollutants such as particulates below levels estimated in the EIR.

Also, the California Air Resources Board (CARB) letter documents CARB staff's determination that the Draft SCS meets SB 375 regional greenhouse gas reduction targets. Although the CARB letter references several improvements to the transportation model being considered for future versions of the RTP, which SANDAG is committed to make for the next RTP, CARB has accepted the SANDAG existing transportation model as appropriate for demonstrating that the 2050 RTP/SCS meets the SB 375 regional GHG reduction targets. To reach this conclusion, CARB modeling experts reviewed four specific technical components of existing SANDAG transportation modeling: the travel model, data inputs and assumptions, sensitivity analyses, and regional performance indicators. The CARB staff report outlining its acceptance of the SANDAG transportation model is available on the CARB website at http://www.arb.ca.gov/cc/sb375/sandagscs.pdf.

The Surfrider Foundation raised issues about State Route (SR) 241. Regarding Surfrider comments and how SR 241 fits into the 2050 RTP/SCS, SR 241 is still a project being considered by the Transportation Corridor Agencies (TCA). While the letter is correct that the California Coastal Commission and the Department of Commerce have both denied the alignment originally proposed by TCA, other alternatives are being analyzed by that agency. For that reason, the project is still included in the document even though an alternative alignment has not been selected or approved that extends into the San Diego region.

Amanda Sousa submitted comments about the trucks from Mexico operating in the United States. In October 2011, the Federal Motor Carrier Safety Administration (FMCSA) granted the first permit to a Mexico-domiciled trucking company under a new cross-border long-haul trucking pilot program. The pilot program is part of FMCSA's implementation of the North American Free Trade Agreement (NAFTA) cross-border long-haul trucking provisions. This pilot program would allow Mexico-domiciled motor carriers to operate throughout the United States for up to three years. United States-domiciled motor carriers would be granted reciprocal rights to operate in Mexico for the same period.

It is not expected that this pilot program will result in an increase in cross-border truck traffic. Trucks permitted under the pilot program would be able to deliver cargo to locations beyond the border zone. Currently, most cross-border trucks deliver goods to a location near the border where cargo is then transferred to another truck to deliver cargo to its final destination. This pilot program has the potential to avoid the cargo transfer that currently takes place.

RRU/HAD/dda

Attachment: Letters, e-mails, and transcribed phone message submitted to SANDAG after the close of the public comment periods.
October 20, 2011

The Honorable Jerome Stocks, Chairman
Board of Directors
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Dear Chairman Stocks:

On September 22, 2011, the Air Resources Board ("ARB" or "Board") received a report from staff on the San Diego Association of Governments (SANDAG) draft Sustainable Communities Strategy (SCS) and the Board discussed ways in which the SCS process could be improved in the next planning cycle. We were pleased that you, First Vice-Chair Jack Dale and Executive Director Mr. Gary Gallegos were able to attend and participate in the public discussion. In the spirit of collaboration, we hope your Board will act on these suggestions as it moves forward in the next land use and transportation planning cycle.

The Board strongly supported SANDAG staff commitment to proceed with improvements to the transportation modeling system. Enhancements to transportation and land use modeling capabilities statewide are being supported by ARB, the Strategic Growth Council, CALTRANS and the University of California. The participation of SANDAG and other metropolitan planning organizations in these efforts will help ensure that modeling improvements can be incorporated into each region’s SCS development in future updates. Specifically, SANDAG’s plan to move to an activity-based model should improve the basis for quantification of the greenhouse gas benefits when the next SCS is prepared.

The move to a non-proprietary activity-based modeling system will also address public comments about the lack of transparency with the existing model. Since the results of modeling scenarios are used in ARB’s target setting process, in the consideration of alternatives in the SCS development process, and in ARB’s review of the greenhouse gas benefits of a SCS, the modeling should be transparent to the public. We appreciate SANDAG’s commitment to proceed with these improvements to the modeling system.

State law directs ARB to review each metropolitan planning organization’s determination that its SCS would, if implemented, meet the greenhouse gas reduction...
target set by the Board. ARB staff reported that SANDAG’s draft SCS would meet the
target.

As part of that discussion, the Board emphasized the importance of considering the
greenhouse gas benefit of alternative scenarios during the planning process. In the San
Diego region, development of a Regional Comprehensive Plan (RCP) update sets the
stage for the next regional transportation plan, including the SCS. We appreciated
hearing from Executive Director Gallegos that additional scenario planning will occur
through the RCP process beginning next year.

We look forward to your Board’s adoption of the draft SCS in substantially the form that
was received. In order to further assure interested parties of your commitment to future
modeling improvements and additional scenario planning, we recommend that the
Board include these commitments as part of your submittal to ARB. We would also
appreciate a description of any changes to the draft SCS which would revise the
quantification of the greenhouse gas emissions in 2020 or 2035. This will assist in
completing ARB’s final action on your SCS.

Congratulations on all your good work to make the state’s first SCS a solid success.

Sincerely,

Mary D. Nichols
Chairman

cc: The Honorable Jack Dale, Vice Chair
    Board of Directors
    San Diego Association of Governments
    818 West Seventh Street, 12th Floor
    Los Angeles, CA  90017

    Mr. Gary Gallegos,
    Executive Director
    San Diego Association of Governments
    818 West Seventh Street, 12th Floor
    Los Angeles, CA  90017

    Ms. Lynn Terry
    Deputy Executive Officer
The Honorable Jerome Stocks
October 20, 2011
Page 3

bcc: Linda C. Murchison, PTSD
     Douglas Ito, PTSD
     Lucille Van Ommering, PTSD

EO Chron (3 copies)
PTSD Chron
AQTPB Chron

PTSD #6241/ARB #16797

X:\Land Use – Transp\SB375\11. ARB Board Items\September 2011 Board Item\Letter to SANDAG Board\SANDAG SB 375 Letter_Final Draft.docx
Dear SANDAG Board and Staff Leadership:

The American Lung Association in California appreciates the opportunity to provide comments on the Regional Transportation Plan and Sustainable Communities Strategy. We are disappointed that the plan does not do more to reduce vehicle use that contributes to our serious air pollution problems. These issues were discussed at the CARB meeting and the general consensus and hope was that SANDAG would address these concerns as it moves forward in the planning and implementation efforts. Please know that as one of the area’s leading public health organizations, the American Lung Association in California is ready to help.

San Diegans are rightfully proud of our beautiful region, but are often unaware of how dirty our air is. The San Diego region experiences significant levels of illness and death due to air pollution generated by our vehicles, fuels and transportation system. Based on the number of bad air days, the San Diego-Carlsbad- San Marcos metropolitan area ranks as the 7th most ozone-polluted city and the 15th most polluted area for short-term particle pollution in the U.S. (Please see attachments).

More than one in ten of the 3 million people living in San Diego County suffer from lung disease: 70,082 children and 188,661 adults have asthma, 95,863 have chronic bronchitis, 34,760 have emphysema, and 1,585 have lung cancer (2008, National Center for Health Statistics). On bad air days, these San Diegans can suffer impaired breathing, increased respiratory infections, increased emergency department use and hospitalizations, and even premature death.

Reducing Vehicle Dependence Is Key To Public Health Improvement

The vehicles that choke San Diego’s streets and highways are responsible for a large part of our ozone, particle pollution and greenhouse gas emissions. Every gallon of gasoline we burn adds 19 pounds of carbon dioxide, a major greenhouse gas, to the atmosphere in addition to lung-damaging criteria pollutants. Measures to promote cleaner, more efficient vehicles are an important part of the solution, but these measures cannot solve the problem entirely. That’s why reducing vehicle miles traveled (VMT) through promoting more compact, transit-oriented development and providing transportation alternatives is a key strategy in achieving the near-term and long-term reductions in greenhouse gas emissions mandated by SB 375.

Recommendations

We appreciate the hard work of your agency and the challenges inherent in being the first MPO to develop a Sustainable Communities Strategy. We are disappointed that the plan does not do more to reduce vehicle dependence that contributes to our serious air pollution problems. We are submitting the following recommendations to strengthen the SCS strategies in ways that will produce healthier growth patterns. Thank you for considering the following recommendations.

Need for Greater Reduction in Vehicle Miles Traveled (VMT)

- One of the greatest causes for concern is the lack of a significant reduction in VMT projected from the SCS strategies. The draft SCS only projects a 1% reduction in VMT during the period that a 9%
reduction in GHG in projected. The SCS states it has a sharper focus on reducing GHG emissions. However, without promoting a mix of strategies that produce a significant reduction in VMT, we are concerned that the GHG targets can not be met. We recommend a greater focus on land use change strategies and specifically on transit-oriented development across the region. As San Diego expands, we must embrace smart healthy growth that will reduce driving.

Less Emphasis on Freeway Expansion
- The overwhelming emphasis on freeway expansion is another great cause of concern. Instead of physical expansion and new lanes, it would be of greater public health benefit to:
  - Invest in transit, bicycle and pedestrian infrastructure
  - Optimize existing infrastructure
  - Implement a more ambitious Transportation Demand Management program.

More Emphasis on Public Health
- The entire timing and phasing of projects needs to be re-evaluated and balanced to invest in transit, active transportation and highway improvement equally throughout the timeline of the RTP. Additionally, prioritization of projects should be based on greatest need by starting in disadvantaged communities with higher rates of chronic disease.
- Clearly outline public health performance measures to be used, and how they will be monitored and evaluated. Our organization is working with Human Impact Partners and other health organizations to develop a general set of health and equity indicators for use with SCS strategies.
- Establish a committee of independent public health organizations to work with you on developing and applying health and equity metrics to the for use with the San Diego SCS.

Transportation Planning Impact on Lung Health
- Public health considerations of the SCS need to go beyond the childhood and adult obesity epidemic to include air quality and lung diseases (Chapter 3, Page 69). Sustainable, mixed-use communities designed around mass transit, walking and cycling have been shown to reduce GHG emissions, air pollution and a range of adverse health outcomes including traffic injuries, cancers, lung and health disease, diabetes, other chronic health conditions, and obesity.
- Adaptation is not the only consequence of climate change (Chapter 3, Page 68). The impact of global climate change could lead to worsened air quality and an increased threat to respiratory health in our communities. The relationship between climate change, air quality and respiratory health is clear. According to the California Air Resource Board 9,200 Californians die prematurely each year due to air pollution, and global warming will only exacerbate California's air pollution problems.

Debra Kelley
Senior Director of Advocacy and Health Initiatives
American Lung Association in California
2750 Fourth Avenue
San Diego, CA 92103
www.lungusa.org/california
Direct: (619) 683-7519
Fax: (619) 297-8402

Join us on Sunday, November 13th at the Embarcadero Marina Park!
San Diego Air Basin
Counties: San Diego

Summary

The San Diego Air Basin is home to 2% of California’s population and represents 9% of California’s criteria pollutants emissions. While emissions from local sources are not sufficient to violate ozone standards, San Diego faces additional challenges of transport of pollutants from the north, which seem to some extent from the eastern boundary pollution in San Diego tends to accumulate in the central region of the basin.

2011 SOTA Grades (2007-2009 Air Quality Data)

San Diego County received an F grade for both the number of unhealthy days for ozone pollution and particle pollution in the 2011 SOTA report. San Diego did receive a passing grade for annual particle pollution.

- The San Diego-Carlsbad-San Marcos metropolitan area ranks as the 7th most ozone-polluted city and San Diego County ranks as the 11th most ozone-polluted county in the United States.

- The San Diego-Carlsbad-San Marcos metropolitan area ranks as the 15th most polluted area for short-term particle pollution in the U.S., up from 17th last year.

Since SOTA 2010, San Diego showed improvement in ozone pollution (4 fewer unhealthy days) and a slight increase in short-term particle pollution (approximately 1 more day).

Key Emission Sources

- Mobile sources (on-road and off-road) account for over 90% of NOx emissions in the San Diego Air Basin, slightly more than half of which are attributed to diesel-fueled vehicles.
- Port of San Diego and goods movement (contributes to regional pollution and to hot spots of pollution near the Port of San Diego)
- Agricultural operations, especially diesel emissions from agricultural vehicles and equipment
Clean Air Progress

- Over the past ten years, San Diego has shown significant improvement in reducing ozone pollution.
  - San Diego dropped by 51% from a weighted average of 60 days per year in the 2000 SOTA (1996-1998 data) to a weighted average of 29.5 days per year in 2011 (2007-2009 data), which is approximately 4 fewer days than reported in last year’s 2010 report.

- Despite fluctuations from year to year, San Diego has shown improvements in particle pollution, cutting the number of high particulate days by almost 30% since the 2007 SOTA report.
  - San Diego’s occasional increases in particulate pollution can be attributed to wildfires (severe wildfires occurred in the region in 2007) and other occasional or other seasonal events.

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San Diego Air Pollutant Trends
(2000-2002 represents first set of PM data)

- PM
- Ozone

Note: 3-year weighted average of 3.3 days or more earns an F grade.

www.lungusa.org/california
State of the Air 2011
California Cities among the Most Polluted in America

Ozone Pollution

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# Short-Term Particle Pollution

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### Year-Round Particle Pollution

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October 26, 2011

The Honorable Jerome Stocks  
Chair Board of Directors  
San Diego Association of Governments  
401 'B' Street, Suite 700  
San Diego, California 92101  

Re: Response to the Attorney General's September 16th Comments  
Regarding the EIR for the 2050 Regional Transportation  
Plan and Sustainable Communities Strategy

Dear Chairman Stocks and Honorable Members of the Board:

On behalf of the California Building Industry Association and the California Business  
Properties Association, this letter responds to the Attorney General's September 16th comment letter  
(Comment Letter) on the Environmental Impact Report (EIR) prepared for the San Diego  
Association of Governments' (SANDAG) 2050 Regional Transportation Plan and Sustainable  
Community Strategy (RTP/SCS).1 As explained below, many of the Attorney General's comments  
are based in policy, not law, making assertions that go well beyond the requirements of the  
California Environmental Quality Act (CEQA), and that contradict well-established CEQA rules.  
Accordingly, the Comment Letter represents, and should be taken as, an advocacy document, as it  
presents only the Attorney General's preferred policy position with regard to the RTP/SCS.

CEQA Vests a Lead Agency Such as SANDAG With Discretion to Formulate Appropriate  
Standards of Significance For Use In The EIR

The Comment Letter claims that the EIR did not employ the correct threshold of  
significance for evaluating the air quality and greenhouse gas (GHG) impacts of the RTP/SCS.  
(Comment Letter at pp. 3, 8 fn 21.) But, pursuant to CEQA, it is the lead agency, here SANDAG,  
that is vested with the discretion to formulate the appropriate standards of significance for use in a

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1 The California Building Industry Association (CBIA) is a statewide trade association with over 5,000 member-companies involved in residential and  
light-commercial construction. The California Business Properties Association (CBPA) serves as the California legislative and regulatory advocate for  
individual companies as well as the International Council of Shopping Centers (ICSC), the California Chapters of the Commercial Real Estate  
Development Association (NAIOP), the Building Owners and Managers Association (BOMA) California, the Institute of Real Estate Management  
(IREM), the California Downtown Association (CDA), the Retail Industry Leaders Association (RILA), CCIM of Northern California, and ACRE of  
Southern California representing over 11,000 companies.
CEQA document. (CEQA Guideline § 15064(b).) SANDAG’s discretion to select the appropriate significance thresholds with regard to air quality, GHG, and all other impacts is supported by a long line of CEQA cases holding that lead agencies have the discretion to determine what they will classify as a significant impact. *National Parks & Conservation Assn. v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1357; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357. Most recently, in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327, the court applied this principle in affirming that lead agencies have the discretion to decide what threshold of significance to use when assessing the significance of impacts from GHG emissions.

Further, as discussed in detail in Appendix G to the EIR, Response to Comments V-4, 5, 6, 17, 18, 19 and Master Response 2, the Comment Letter inaccurately characterizes the significance thresholds employed by SANDAG with regard to air quality and GHG impacts. For example, contrary to the Comment Letter, the EIR evaluates both state and federal standards in determining the significance of impacts. Accordingly, the Attorney General’s claims about significance thresholds not only conflict with the discretion vested in SANDAG pursuant to CEQA, the comments also fail to correctly reflect the thresholds and analysis that SANDAG did employ.

There is No Basis in CEQA for the Attorney General’s Criticism of the Environmental Justice Analysis in the EIR -- As CEQA Does Not Require Such Analysis

The Comment Letter contains the Attorney General’s extended critique of the EIR regarding the RTP/SCS effects on “communities currently experiencing environmental injustice.” While we understand that SANDAG has included an Environmental Justice analysis (Chapter 4.6) in the EIR, the comments by the Attorney General with regard to analysis of environmental justice issues can only be considered outside the framework of CEQA, as CEQA does not require such an analysis. CEQA is very clear on this point, stating: “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” (CEQA Guidelines, §15064(e) [emphasis added].) While an EIR may consider whether a project’s socio-economic effect may result in indirect physical impacts, neither the EIR, nor the Attorney General’s critique, concern such an analysis. Instead, SANDAG chose to consider socio-economic issues only with regard to their non-physical impacts, such as whether the “mobility benefits derived from the 2050 RTP/SCS in terms of travel times” would be “substantially less for minority populations.” (Final EIR at p. 4.6-18.) The question of a project’s impact on minority populations may certainly be a relevant issue for SANDAG to consider, but CEQA only requires analysis of physical impacts without regard to the socio-economic status of those who may or may not be impacted. Accordingly, the Attorney General’s environmental justice comments should be considered as policy comments and have no bearing on the adequacy of the EIR under CEQA.

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2 California Code of Regulations, Title 14, Chapter 3.
The Honorable Jerome Stocks  
October 26, 2011  
Page 3

The Attorney General’s Mitigation Comments Go Beyond What Is Required for a Program-Level Analysis Under CEQA

The Attorney General states that SANDAG must consider and adopt additional mitigation measures for air quality impacts, and must consider and adopt land use mitigation measures to reduce GHG emissions. But, as detailed in Appendix G of the EIR, these comments disregard the substantial analysis of mitigation included in the EIR. (See Response to Comments V-14, 15, 16, 22, 23, and 24 and Master Response 21.) The comments also disregard the programmatic nature of the EIR, and, thus, the type of mitigation that is appropriate for a Program EIR. (See Appendix G, Master Response 1.) Finally, the comments effectively ask SANDAG to act beyond its jurisdiction, a position that has been expressly rejected in CEQA case law (See Appendix G, Master Response 4.).

The approach to mitigation in the EIR is appropriate, and consistent with CEQA, the CEQA Guidelines, and law case. The EIR Air Quality chapter sets forth detailed policy-level mitigation measures, and many of those measures include language stating that "SANDAG shall" implement the measures, along with other jurisdictions in San Diego County. The EIR recognizes, however, that SANDAG does not possess land use regulatory authority and that an RTP is a transportation planning and policy document. Accordingly, the EIR notes that other agencies will have to implement many of the policies. For that reason, the EIR takes the properly conservative approach of acknowledging that it cannot be determined at this time that the mitigation measures will fully mitigate the identified impacts, and those impacts are thus determined to be significant and unavoidable. (Public Resources Code § 21081.6(b); CEQA Guideline § 15126.4(a)(2) [mitigation measures must be enforceable through means that are legally binding].) Contrary to claims in the Comment Letter, the Final EIR does not defer analysis of mitigation measures for the plan, rather it properly focuses its analysis on the very broad plan and program that is being analyzed. Project-level mitigation is being deferred, and properly so, until there is a project to analyze. This approach was specifically upheld by the California Supreme Court against a similar deferral claim in In re Bay-Delta Programmatic Environmental Impact Report (2008) 43 Cal.4th 1143, 1174-75. Notably, the RTP/SCS being considered by your Board are the same type of very broad policy level planning documents as the court considered in Bay-Delta.

Further, the Attorney General’s assertion that SANDAG must adopt land use mitigation measures reaches well beyond SANDAG’s jurisdiction, and far beyond the scope and function of the RTP/SCS. These are not land use plans. In particular, the SCS does not -- and cannot -- dictate local land use policy (although projects consistent with the SCS can take advantage of some provisions that seek to streamline the CEQA process). Both CEQA and CEQA case law confirm that CEQA does not extend the reach of specialized agencies into broader areas of land use authority. (Public Resources Code § 21004; Kenneth Mebane Ranches v. Superior Court (1992) 10 Cal.App.4th 276.) Accordingly, because, “SANDAG has no authority to adopt local land use plans or approval local land use project that will implement the SCS” the EIR is not required to adopt land use mitigation measures. (See Master Response 4.)
SANDAG is Not Required to Comply With, or Evaluate Governor Schwarzenegger’s 2005 Executive Order

The Comment Letter states that Executive Order S-3-05 is “designed to meet the environmental objective that is relevant under CEQA (climate stabilization). SANDAG thus cannot simply ignore it.” (Comment Letter, p. 8, FN 21.) The Attorney General has overstated the legal relevance of Executive Order S-3-05, as demonstrated by both the Order itself, and past Attorney General Opinions. As discussed in detail in Appendix G to the EIR, Master Response #2, Executive Order S-3-05 imposes no legal requirements upon SANDAG. First, the Order’s discussion of GHG emissions targets pertains only to State agencies. SANDAG is a regional planning agency comprised of 19 local governments, and, as such, is not subject to the Order. Second, to the extent that the Attorney General contends that SANDAG is nonetheless obligated to apply the Order when developing its GHG emission threshold of significance, the Attorney General’s own opinions contradict this position. As stated in Master Response 2, “Attorney General opinions stress that the Governor may not invade the province of the legislature.” The legislature enacted CEQA and thus an Executive Order, such as S-3-05, cannot “invade” that statute. In preparing the EIR, SANDAG is required to comply with CEQA – and CEQA only. And, as discussed above, SANDAG complied with CEQA when it exercised its discretion in determining the appropriate thresholds of significance for the EIR, including the appropriate significance threshold for GHG emissions.

The EIR Determines Air Quality Impacts For the Project As a Whole, While Appropriately Recognizing That The RTP/SCS Consists of Two Major Parts – the RTP and the SCS.

The Comment Letter also criticizes the fact that the EIR evaluates the significance of GHG emissions impacts as of 2020, 2035, and 2050. The Attorney General suggests that such methodology fails to evaluate the whole project, but, as discussed in Appendix G, Response to Comment V-21, the EIR’s disclosures of these measurements for different points in time were prepared in order to account for the project as a whole. Further, lead agencies have discretion under CEQA to determine the best means and methodologies for evaluating impacts. (Laurel Heights Improvement Ass’n v. Regents (1988) 47 Cal.3d 376, 409; Clover Valley Foundation v City of Rocklin (2011) 197 Cal.App.4th 200, 243.)

In sum, in our view SANDAG’s staff and EIR consultant have responded fully and accurately to the comments submitted by the Attorney General. Many of those comments go beyond CEQA’s requirements and ask SANDAG, as a policy matter, to provide further analysis or further mitigation that goes well beyond what the law requires. Given the complexity of evaluating regional transportation plans and sustainable communities strategies, and the substantial detail that SANDAG has already provided in the EIR, we respectfully submit that SANDAG has fully complied with the letter and the spirit of CEQA’s environmental impact requirements.
On behalf of CBIA and CBPA, we appreciate the opportunities to submit these important comments for your consideration at your October 28 meeting.

Sincerely,

Michael H. Zischke

MHZ/ps

cc: Sarah Owowitz,
Cox Castle & Nicholson
From: Noel Spaid [mailto:nspaid@san.rr.com]
Sent: Wednesday, October 19, 2011 11:48 AM
To: Johnston, Phillip; Arturo Jacobo; Mike Bullock; Jack Hegenauer; DENNIS RIDZ; NORM RATNER; CHARLES RICHMOND; rcotton1
Subject: Fwd: SANDAG’S 2050 & THE AG

AM FORWARDING TO SANDAG AT REQUEST OF MIKE BULLOCK, thank you

Begin forwarded message:

From: Noel Spaid <nspaid@san.rr.com>
Date: October 18, 2011 10:22:04 AM PDT
To: BOB HAWKINS <bob.hawkins@uniontrib.com>, letters@uniontrib.com, Jack Hegenauer <JackHegenauer@att.net>, DENNIS RIDZ <dennisridz@hotmail.com>, NORM RATNER <eyedocnkr@aol.com>, CHARLES RICHMOND <cdr@cts.com>, rcotton1 <rcotton1@san.rr.com>, Pamela Epstein <pnenstein@gmail.com>, Mike Bullock <mike_bullock@earthlink.net>, Steve Goetsch <solanasteve@roadrunner.com>, courtney.dwyer@sandiego6.com, Chris Nichols <CNichols@nctimes.com>
Cc: patricia_thompson@10news.com, preston phillips <preston_phillips@10news.com>, lash communications <lashcommunications@gmail.com>, "Laurel L. Impett" <Impett@smlaw.com>, "Rachel B. Hooper" <Hooper@SMWlaw.com>
Subject: SANDAG’S 2050 & THE AG

BOB HAWKINS AND LETTER TO EDITOR

HAWKINS ARTICLE TODAY’S UT ON "CRITICS DECRY 40 YEAR TRANSPORTATION PLAN

The public should be made aware of the fact that it is not just the general critics (56% of San Diegians) who decry Sandag’s 2050 plan, the State of California has already advised Sandag that the 2050 plan so seriously violates State Law, SB375 and SB32, that it has to be reformed, not passed. The Attorney General’s office sent a long advisory letter to Sandag some weeks ago advising that the plan puts "more cars and light trucks" on highways and cannot meet state mandates to return San Diego back to the 1990 level of pollution. The AG cited the fact that San Diego is considered one of the most seriously polluted city in the nation. The plan would significantly add to an already dangerous level of pollution affecting our health and environment, not resolve it. The AG found that the plan also did not address the social inequities by focusing on cars,(instead of accessible transit), among other oversights to the people who traditionally live is lower income neighborhoods. The I-5 project has the same defects as the 2050 plan as set out by I-5 PLAGUE's attorneys and about 5000 others. Studies by San Diego Foundation prove 56% of the people want transit, not traffic. The AG is advising Sandag not to attempt to ignore
State laws, and even offered assistance in rewriting the 2050 plan towards compliance with existing law. Sandag’s attempt to go forward and approve the plan on October 28 is an open, willful, defiance of the AG’s strict warning and refusal to listen to the cries of the public’s demand for transit as a safe, efficient, healthy need in San Diego, one which has been seriously ignored for 30 years. If they approve it, they are buying a lawsuit for all of San Diego County, embroiling us in a multimillion dollar legal fight which they have been pre-advised, San Diego will lose. The arrogance of Sandag in defying the AG’s warning is astounding and requires look at the private agendas that may be fueling this grotesque, unlawful attempt to shove the illegal and unwanted plan and lawsuit down San Diego’s taxpayer’s throats. We the taxpayers, will pay for Sandag’s refusal to listen to our votes, and having to pay for the lawsuit to sustain our rights. Where is Sandag held accountable for these actions? Nowhere, they are appointed. We have to vote out the elected politicians that appointed the arrogant, self-righteous Sandag members who bring this torrential lawsuit down on an unsuspecting public instead of going back to the drawing board with the AG and drafting a legal plan for 2050. Shame on you, Sandag, Shame to do this to us.

Noel Spaid, President of I-5 PLAGUE Del Mar CA 858 350-8718
October 24, 2011

Honorable Jerome Stocks, Board Chairman
Honorable members of the SANDAG Board of Directors
SANDAG
401 B St. Ste 800
San Diego, CA 92101

Re: Suggested Improvements to SANDAG’s Final 2050 RTP

Chairman Stocks and members of the SANDAG Board:

On occasion of the adoption of California’s first SCS/RTP under SB 375, we are writing to commend SANDAG on some important recent improvements to the plan and to re-iterate our recommendations for strengthening this precedent-setting plan.

This RTP takes some important steps in the right direction and has been acknowledged for its market appropriate housing mix, significant increase in funding for active transportation and transit, and its innovative Transportation Demand Management (TDM) programs.

Since the issuance of the draft SCS/RTP this spring, we have been working in good faith to develop a discrete set of suggested improvements to the plan\(^1\). SANDAG has recently adopted amendments to address our concerns and our purpose here is to acknowledge the good work that has been done. We are also concerned, however, that the amendments made to date do not fully address our concerns in a number of important respects.

Below, please find our original six recommendations, SANDAG’s responses to date, and our specific policy suggestions as to how the final 2050 SCS/RTP could be enhanced in your final vote this Friday to address these concerns.

1. SANDAG should commit to developing more aggressive integrated land use and transportation scenarios that go beyond adopted general plans (particularly in the North County) that, if implemented, would reverse the "backsliding" in the "out years."

SANDAG’s response is to: **Incorporate the concepts and recommended actions of the 2050 RTP into the next update of the RCP, including alternative land use scenarios\(^2\).**

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\(^1\) [http://kwinchboard.nrdc.org/objes/weaken/with_carbs_leadership_sandag_s.html](http://kwinchboard.nrdc.org/objes/weaken/with_carbs_leadership_sandag_s.html)

\(^2\) Chapter 3, page 3-79, Action item 1
Recommended Action: We are pleased to see SANDAG commit to examining alternative land use scenarios in the RCP – an element we believe was noticeably absent from this RTP/SCS process. In your resolution adopting the 2050 RTP/SCS, SANDAG should commit to developing integrated land use and transportation scenarios which preserve and exceed the GHG reductions gained by 2035 all the way through 2050. This “backsliding” was the number one concern raised at the Sept 22 ARB board meeting, and some organizations question whether SANDAG has truly achieved its 2035 GHG targets if this progress is eroded over time. SANDAG needs to commit to developing both alternative land use and transportation investment scenarios which reverse this disturbing trend as part of the next iteration of the Regional Comprehensive Plan. In developing these scenarios, it is essential that SANDAG preserve the flexibility to adjust transportation investment assumptions to complement the alternative land use scenarios.

2. SANDAG must commit to develop, and not just "consider" developing an Early Action Program and implementation mechanism for active transportation investments.

SANDAG’s response is to “Develop an Active Transportation Early Action Program”.

Recommended Action: Our original hope was that SANDAG would adopt an active transportation early action program with concrete projects and investment levels concurrently with the 2050 RTP. We appreciate the commitment in the RTP to develop this program, but such a commitment is meaningful only if tied to a date certain. We therefore request that SANDAG bring to the board a proposed Early Action Program for bike and ped projects—as well as for Safe Routes to Transit and Safe Routes to Schools—laying out near-term funding (next 5 years) no later than May 1, 2012.

3. SANDAG should commit to develop a Transit Oriented Development (TOD) Policy to encourage the development of walkable, mixed use neighborhoods in the direct vicinity of transit stations.

SANDAG’s response is to: Prepare a regional Transit Oriented Development strategy as part of the RCP update and to Pursue joint development opportunities to promote the construction of sustainable housing and mixed-use projects at existing and planned transit stations. (p. 3-80 17)

Recommended Action: We are pleased to see SANDAG commit to creating a TOD Strategy, and we would like to see more detail. We continue to believe that Resolution 3434 in the Bay Area provides a good model: transit funding to local agencies there is contingent on the adoption of transit-supportive land use patterns in station areas. We request that SANDAG study this policy as a model, and at a minimum adopt a TOD policy that incentivizes local governments to adopt transit-supportive land uses—including carefully evaluating parking policy, and ensuring walkability—around transit stations.

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3 Chapter 6, page 6-79, Item 45.
4 Chapter 3, P3-79 2
4. Since a robust transit infrastructure is critical to making those areas that have already committed to smart growth (e.g., City of San Diego) "livable" at the new permitted densities, SANDAG should commit to developing a detailed transit operations funding plan that identifies the actions needed to make assumed mode shares in 2020 and 2035 a reality (i.e., where to get extra funding).

SANDAG’s response is to continue to refine the Quality of Life Funding Strategy and determine the appropriate time to seek voter approval².

Recommended Action: Since our understanding is that actual unmet transit need is $11 billion and the Quality of Life Measure is unlikely to yield the full amount needed, we would like to see SANDAG continue to explore other funding opportunities for transit, including a “re-assessment of the transportation network” as recommended by the Air Resources Board, to determine whether all projects conceptualized prior to the passage of SB 375— including TransNet projects— meet the region’s goal of sustainability and livable communities. Projects that are determined to undermine this goal need to be re-evaluated. In addition, we would like to see SANDAG come to the table to support new legislative proposals that give MPOs new authority to raise local revenue for transportation options. We also commit to work proactively and cooperatively with SANDAG and our partners to seek and support new funding for transit.

5. SANDAG should open its travel model to public review and be prepared to disclose the relative contribution of various elements of its SCS (e.g., managed lanes, mode shift to transit, congestion reduction, reduced average trip lengths, telecommuting assumptions) to claimed reductions in 2020 and 2035.

SANDAG Response: Discussions with your staff indicate that SANDAG’s new activity based model will be open source, though this is not documented in the RTP.

Recommended Action: We would like to see a written commitment to an open source activity based model. To further increase transparency, SANDAG should include a discussion on project prioritization in its next RTP, and identify how each project is aligned with current goals, including GHG emissions reduction. A discussion of options and constraints in reordering the project delivery schedule, to deliver projects in earlier years to support the growth of transportation efficient communities, could shed light on further opportunities to reduce GHG emissions.

6. SANDAG should commit to adopting a Complete Streets Policy.

SANDAG’s response is to: Develop a regional Complete Streets policy. (Chapter 6, p6-79, Item 54) and: Through the development review process, continue to provide comments to local jurisdictions that encourage development patterns that promote walking, bicycling, and access to public transit in existing and potential smart growth areas and in or near major public

²Ch 3, P 3-81, Item 28
facilities such as colleges and hospitals, and that encourage reconfiguration of the public right of way to create complete streets. (Chapter 3, Page 3-81, Item 31.)

Recommended Action: We are pleased to see SANDAG make this commitment and look forward to working with your staff to develop this policy. We would like to see a commitment from the Board to a date certain by which staff will bring this policy to the board for adoption. We recommend October 1, 2012.

We appreciate the opportunity to work with SANDAG staff on California’s first Sustainable Communities Strategy and Regional Transportation Plan. While we continue to be concerned about the plan’s emissions backsliding between 2020 and 2050, we do recognize that staff has worked tirelessly within existing constraints to create this plan. We believe that if SANDAG makes these proposed amendments it will greatly improve the plan and be taking a meaningful step towards regional sustainability. We look forward to working with you to implement these changes.

Sincerely,

Amanda Eaken
Deputy Director, Sustainable Communities
NRDC

Elyse Lowe
Executive Director
Move San Diego

Stuart Cohen
Executive Director
Transform

Dan Silver, M.D.
Executive Director
Endangered Habitats League
October 26, 2011

VIA ELECTRONIC MAIL

SANDAG Board of Directors
401 B Street, Suite 700
San Diego, CA 92101
2050rt@sandag.org

RE: 2050 Regional Transportation Plan and Sustainable Communities Strategy
October 28, 2011 Meeting – Item 9A – OPPOSE

Chairman Stocks, members of the Board and staff:

The San Diego and Imperial Counties Labor Council, AFL-CIO advocates on behalf of 133 local unions within the San Diego and Imperial Counties and includes a membership of more than 192,000 working families. The Labor Council facilitates collaboration between local unions and represents employees from every job sector, including building and construction, education, hospitality and medicine. Our advocacy strives to create more jobs, better jobs and better lives for all workers in the region – union and non-union.

The Labor Council has an interest in the planning of our regional transportation systems. We champion greater access to employment centers, improved standards of living and job creation. In order to promote those interests, the Labor movement has been a strong advocate for Senate Bill 375 and the principles expressed in the bill: reducing vehicular emissions; building compact, sustainable communities; and improving the quality of life for future generations of San Diego residents.

In a July 8, 2011 comment letter, the Labor Council advocated that SANDAG make public transit a priority in its regional transportation planning. Unfortunately, we believe the Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) fall short of achieving that overarching goal, especially when better alternatives exist.
Attorney General Kamala Harris made many salient points of why the plan falls short in her office’s letter Sept. 16, 2011 friends. We request you address the Attorney General’s concerns while also considering the following impacts that the Regional Transportation Plan and Sustainable Communities Strategy has on the working people of San Diego County.

1. Equal Access to Employment Centers

SANDAG’s 2050 Regional Transportation Plan embarks on a trajectory that would phase in a significant amount of transit expansion for the latter half the plan. We believe the RTP should begin investment and development of public transportation in the initial phases of the plan.

Transit provides a sustainable alternative mode of transportation that links residents with employment centers; yet this connection is tenuous at best in the San Diego County, and therefore must be strengthened.

According to a recent Union-Tribune editorial, commenting on a Brookings Institution study on the connection between public transit and employment, “only 29 percent of the jobs in the county are accessible by transit.” Furthermore, “when it comes to employment access, only 37 percent of the low-income can get jobs by transit, compared to 29 percent for middle-income and only 20 percent for high income residents.” In light of this evidence, SANDAG must invest more heavily in transit development and ensure that proposed locations and corridors for transit projects close the gap between residence and workplace; such an effort would provide residents, regardless of race, income or national origin, improved as well as equal access to employment centers and jobs.

2. Improved Standards of Living

An increased focus and investment on public transportation would bring the RTP much closer to achieving the long term goals of SB 375: reducing vehicular emissions; building compact, sustainable communities; undercutting the region’s reliance on fossil fuels in favor of clean energy opportunities; and improving the quality of life for future generations of San Diego residents.

The standards set by SB 375 would build compact and sustainable communities that enjoy a wide range of transportation and housing options; the potential environmental, health, economic and social justice benefits of such a community would translate into – for the resident – less isolation, better opportunities to develop skills for job productivity, more physical activity and a lower incidence of chronic diseases.

The path to achieving this vision of a superior quality of life is through greater investments in public transportation in the initial phases of the Regional Transportation Plan.

3. Job Creation and Security

Investment and development of transit would reap great benefits for San Diego residents in terms of job growth and stability.

According to an analysis by Smart Growth America, spending on public transportation is an effective job creator. SGA’s analysis of 2009’s American Recovery and Reinvestment Act showed that, “every billion dollars spent on public transportation produced 19,299 job-months.”\(^2\)

The evidence here is clear: transit development and investment in public transportation will result in greater employment and job retention while laying the foundation for sustainable transportation systems. The construction and public service sectors would experience substantial growth as jobs arise out of driving buses, operating light rail vehicles, maintaining transit infrastructure, and managing dispatch communications.

Sustainable and eco-friendly modes of transport that transit development engenders will provide cleaner, safer and healthier work environments for San Diego employees.

The San Diego and Imperial Counties Labor Council, AFL-CIO is committed to securing jobs, an improved standard of living and access to employment centers for our members and our affiliates. We believe these interests would best be achieved through transit-oriented development and we urge SANDAG to reconsider its priorities in its Regional Transportation Plan.

The proposed RTP and SCS fall short of these stated goals. We urge you to reject the proposals at the Oct. 28 meeting and to consider alternatives such as the 50-10 Transit Plan submitted by the Transit San Diego campaign.

Investing in public transportation today would provide for future generations of San Diego residents, stable green-collar jobs, healthier physical and mental health and equal access to centers of employment all across the San Diego region. Please make the right decision for San Diego County by rejecting the proposed RTP and SCS.

In solidarity,

[Signature]

Lorena Gonzalez
Secretary-Treasurer/CEO

October 14, 2011

Honorable Jerome Stocks
Chair, Board of Directors
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

RE: Response to “Draft 2050 Regional Transportation Plan/Sustainable Communities Strategy Public Comments and Responses”

Dear Chairman Stocks and Members of the Board,

The Sierra Club acknowledges and thanks SANDAG’s staff for its hard work in preparing responses to public comments on the Draft 2050 Regional Transportation Plan/Sustainable Communities Strategy (hereinafter “response to comments”). The Sierra Club would like to address the large number of public comments critiquing the Draft 2050 Regional Transportation Plan/Sustainable Communities Strategy (hereinafter “Draft RTP/SCS”) and the adequacy of the response to comments provided.

I. Procedural Inadequacy of Response to Comments

Overall SANDAG’s responses to the public’s comments are inadequate. They simply sidestep the issues or questions raised. Furthermore, the scope of the public’s comments is not limited to the form and function of the RTP/SCS but extend to its associated environmental impacts. It is a logical conclusion that the commenter’s are also simultaneously addressing the corresponding Draft Environmental Impact Report (DEIR). Therefore, the Sierra Club concludes and recommends that the comments addressing environmental impacts of the Draft RTP/SCS are comments on the interdependent DEIR requiring a response in the Final Environmental Impact Report (FEIR). It is a disservice to bifurcate and leave unaddressed the public’s comments on the environmental impacts of the Draft RTP/SCS.

Issues inadequately addressed by the response to comments include, but are not limited to, the following:

- A shortfall in significantly reducing Vehicle Miles Traveled (VMT);
- The failure to phase transit projects in the near-term to balance transit investments and road investments;
- The failure to develop a connected multi-modal competitive and performance based transit network with transit frequencies of 15 minutes or less in the near-term;
- Transparency and accountability; and
- Meaningful land-use changes integrating jobs, transit, and housing.
A. Abuse of “Comment Noted” Response

There are several instances where the response to the public comments was “comment noted.” While “comment noted” may be an appropriate response in limited instances, the extensive use of “comment noted” in response to substantive public comments on the Draft RTP/SCS lacks a good-faith, reasoned analysis. Examples of the overuse of “comment noted” in response to public comments include:

- Comments 79 and 80 from the American Lung Association in California, which stressed the importance of reducing VMT to achieve reductions in ozone, particle emission, and greenhouse gas emissions, which would reduce suffering to people with asthma and respiratory illness and to prevent future illness;¹
- Comment 98 from the Buena Vista Audubon Society, which indicated that a letter detailing specific concerns about the I-5 freeway expansion was sent to your office;²
- Comments 121 and 124 from the California Coastal Commission, which stressed the importance of regional public transit along coastal areas as opposed to focusing on private transportation, which can more substantially impact coastal areas;³
- Comments 1284 and 1287 from the Carmel Valley Community Planning Board, which indicated a concern for the changes to community character that freeway connectors will create;⁴
- Comments 1368-1375 by the City Heights Community Development Corporation, which stressed the health consequences of automobile transportation and reduced economic impact per taxpayer dollar spent on automobile transportation as compared to public transportation;⁵ and
- Comment 1573 from the El Cajon Collaborative, which stressed the need for bike transportation accommodation and a bike rental system near transit stations.⁶

B. Conclusory Statements in Response to Comments

Consistently throughout the responses SANDAG staff either failed to address or entirely ignored the issue identified. Examples include:

- Comment 1455 from the City of Oceanside requested sub-regional maps to supplement the detail that is noticeably absent in the broad regional map in order to interpret the land-use planning aspects of the Plan. The response was “viewing the maps in PDF allows for the flexibility to focus on areas of interest throughout the region.” The response did not indicate why more detailed regional maps were not included.⁷
- Several comments, including those from the Move San Diego, the Sierra Club, and Natural Resources Defense Council, expressed a strong opposition to freeway expansion. However, the responses to these comments stress that the Draft RTP/SCS is a “balanced approach that provides many choices for people to get to work, school, or play” and that the Draft RTP/SCS “includes the most investment in transit and alternative modes

¹ Response to comments at 9.
² Id. at 12.
³ Id. at 16-17.
⁴ Id. at 131.
⁵ Id. at 148.
⁶ Response to comments at 177.
⁷ Id. at 159.
compared to any previous RTP.” These conclusory statements are misleading when, in fact, the Draft RTP/SCS includes the most investment in freeway expansion compared to any previous RTP. In addition, there is little discussion as to why seventy-two percent of the transit budget is reallocated to the last two decades of the RTP.

- Comment 1672 addressed the use of highway expansion as a means of reducing emissions and that seventy-two percent (72%) of the transit budget is deferred to the last two decades of the RTP. Yet, the response states that “more than 75 percent of the proposed transportation investments in the plan support new transit infrastructure and service new carpool lanes.” Carpool lanes require highway expansion, so in essence SANDAG is responding to a criticism of highway expansion with an acknowledgment that it is expanding highways. In addition, this comment response fails to discuss the issue that 72% of the proposed transit budget does not manifest until 2030. The analysis unsuccessful addresses the impacts to the entire transportation system and how it translates to a more effective movement of goods and people.

- Comment 1682 requested that a map overlaying the Smart Growth Concept map with planned transit uses for 2030 be added to the Draft RTP/SCS. The response is that “the Technical Update of the Smart Growth Concept Map is currently underway and will be completed upon adoption of the 2050 RTP/SCS.” This is an unacceptable time frame, as it does not allow the public to comment on the map. Such a map would indeed help the public visualize the land-use and transportation changes that will occur over the next 40 years.

II. Substantive Inadequacies of the Response to Comments

This Draft RTP/SCS sets forth SANDAG’s vision for public health and regional planning over the next half century. As the first MPO to draft an SCS, it will serve as a model for other MPOs in the State. SB 375 requires SANDAG to demonstrate how development patterns and the transportation network, policies, and programs can work together to achieve the GHG emission targets. Unfortunately, under the Draft RTP/SCS, VMT will increase by over 51% by 2050, and the GHG reduction will show only a de minimis decrease of roughly 1% by 2050. In addition, SANDAGs methodology and quantification of GHG emission reductions is questionable.

A. The Intent of SB 375 and the California Air Resources Board (CARB)

Underscore the Importance of Having MPOs Reduce VMT in Order to Reduce GHGs.

The legislative intent of SB 375 calls attention to the necessity for reducing VMT in order to achieve the GHG reduction goals under California’s Global Warming Solutions Act (AB 32). Near the time of SB 375’s enactment, California’s transportation sector produced 38% of overall emissions, making it the State’s largest emissions source. Emissions from passenger cars contribute substantially to the larger transportation sector’s emissions. As a result, CARB suggested:

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8 Id. at 196, 207, 236, 241-482.
9 Id. at 195.
10 Id. at 198.
11 Cal. Air Resources Board, Climate Change Draft Scoping Plan 7 (June 2008 Discussion Draft).
While improved vehicle technology and lower carbon fuels provide most of the transportation reductions in 2020, additional reductions can be achieved by making the connection between transportation and land use. This scenario reflects an increased emphasis on urban infill development: more mixed-use communities, improved mobility options, and better designed urban environments.\footnote{12}

CARB clearly recognizes that reducing VMT is crucial for the success of its GHG emissions targets. The lynchpin of SB 375’s successful implementation is the reduction of VMT and that “without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.”\footnote{13} CARB has recognized that MPOs are “essential partners” in achieving GHG reduction targets.\footnote{14}

B. The Structure of SB 375 Provides Comprehensive and Consistent Statewide Priorities Toward Compact Development.

While most land-use authority is retained by local MPOs, it does provide comprehensive and consistent statewide priorities toward compact development. SB 375 creates an incentive-based structure that seeks to accomplish three main goals: “[1] utilize the regional transportation planning process to help California meet its GHG emission reduction targets under AB 32, [2] reform CEQA to encourage mixed use and mass-transit adjacent development, and [3] coordinate the regional housing needs allocation process with the regional transportation planning process.”\footnote{15}

1. The Role of CARB Regarding Approval of Sustainable Community Strategies (SCSs)

In addition to GHG target-setting, CARB has final review authority over any SCS or Alternative Planning Strategy (APS).\footnote{16} In particular, CARB’s review focuses on the quantification of GHG emissions reductions and the methodology used to achieve those goals.\footnote{17}

A. Each RTP Must Reflect Funding Choices Consistent with SB 375’s GHG Emission Reduction Goals.

MPOs, when drafting their RTP/SCSs, must:

[i]dentify the general location of uses, residential densities, and building intensities within the region; (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth,

\footnote{13} See SB 375 § 1(c).
\footnote{14} CARB, Summary of Board Meeting Dec. 6 & 7, at 5-7.
\footnote{16} Cal. Gov’t Code § 65080(b)(2)(J) (West)
\footnote{17} Id.
household formation and employment growth; (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584; (iv) identify a transportation network to service the transportation needs of the region; (v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65080.01; (vi) consider the state housing goals specified in Sections 65580 and 65581; (vii) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board.

SB 375 creates additional requirements for regional transportation plan development over and above what was previously required under state and federal law. For the first time, each MPO must ensure internally consistency with the "financial" and "policy" element of their RTPs. The RTP/SCS must reflect funding choices that are consistent with GHG reduction, which CARB and SB 375 indicate are tied to reduction in VMT. Funding choices should include a robust frontloaded transit infrastructure, increased urban infill, increased mixed-use development near transit options, and sharply reduced incentives for travel by private automobile.

If an MPO financially prioritizes highway construction at the commencement of the planning period while deferring transit funding to the later years, this illustrates a clear inconsistent. In the RTP/SCS, seventy-two percent of all transit funding is confined to the last twenty years of the plan. In addition, SANDAG has prioritized funding to expand 13 freeways in the region primarily in the first twenty years of the plan. In doing this, the "policy element" of SANDAG’s Draft RTP/SCS. The quantity of GHG emissions reductions that the strategy would achieve is insufficient.

The current plan must be amended to accurately calculate the amount of state funding that is available for the plan’s entire 39-year period. As written, the total state funding for the period shows $42,509,000,000. However, adding up the separate line item figures included within the same graph on page 188 yields a figure of $41,509,000,000.4 This one billion dollar discrepancy carries into the total revenue amount. Instead of being $196,178,000,000, the total should be $195,178,000,000. This erroneous revenue figure is used to calculate the expenditures. The figure needs to be corrected.

C. Inadequate Cumulative Impact

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18 Cal. Gov’t Code § 65080(b)(2)(B)(i)-(vii) (West)
19 See Cal. Gov’t Code § 65080(a); see also 49 U.S.C. § 5303(i)(1) (West)
21 See Draft RTP/SCS at 190.
22 See Draft RTP/SCS at 188.
23 Id.
24 See attached spreadsheet.
The 2050 RTP/SCS results in significant, irreversible environmental consequences. Many of the public comments directly relate to the environmental impacts.

1. Transportation and Traffic

The proposed highway/roadway improvements and expansions would result in a considerable increase in freeway capacity and VMT. Any reduction in traffic congestion accompanied by increases in vehicle speeds via additional lane capacity would be temporary. Such freeway expansion induces travel, leading to more automobile traffic, either from parallel facilities or from induced demand that the additional roadway capacity satisfies.

Many of the public comments expressed concern over the RTP/SCS’s preference for allocating funds for freeway expansion rather than transit development. These concerns are consistent with the vast majority of research regarding transportation and land use, which demonstrates that expanding highways is only a temporary solution to the complex problems of traffic congestion. The Victoria Transport Policy Institute explains that “[r]oad improvements that reduce travel costs attract trips from other routes, times and modes, and encourage longer and more frequent travel.”

The Draft RTP/SCS and its subsequent response to comments insufficiently explain the problems posed by generated or induced traffic, and the corresponding increased VMT. SANDAG merely fills in the gaps with oversimplified statements that highlight the inadequacies of its analysis.

Numerous comments expressed concern over the categorization of freeway lanes such as BRT lanes, HOV lanes, and “Managed Lanes” as transit. SANDAG’s main transit goals include lessening freeway congestion, encouraging compact land uses, and expanding service to employment centers. SANDAG relies heavily on expanding freeway capacity with the creation of additional general-purpose lanes coupled with BRT, HOV, and Managed Lanes to obtain this target objective. There are numerous documented problems and concerns with BRT and HOV that contradict these transit goals.

2. GHG Impacts and Air Quality

SB 375 “prompts Californians to work together to reduce GHG emissions from cars and light trucks” by “requiring integration of planning processes for transportation, land-use, and housing.” The goal of SB 375 is “to reduce vehicle miles traveled by providing incentives for high-density urban development along public transportation corridors.” SB 375 “help[s] implement AB 32 by aligning planning for housing, land use, transportation, and greenhouse gas emissions”, thus making it the missing piece in California’s plan to reduce global warming pollution.”

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28 Brent Schoradit, Sustainable Communities Strategies Will be Essential to the Success of SB 375, 36 Ecology L. Q. 611, 612; See supra notes 12-15 and accompanying text.
When formulating an SCS, it is necessary to consider the environmental consequences of the strategy. California Attorney General Kamala D. Harris’ letter exemplifies the nexus between the Draft RTP/SCS and its DEIR. The Attorney General flushes this out in her letter by discussing both documents in an integrated fashion, stating “SANDAG’s focus on conformity with the state air pollution plans fails [to] adequately address the region’s serious air quality problems.” Noting that the Environmental Protection Agency is soon to reclassify the San Diego Air Basin as in “serious” nonattainment of the federal ozone standard, and that San Diego was ranked as having the seventh worst ozone problem and fifteenth worst particulate pollution problem in the nation, the Attorney General comments that there are “significant problems with [the] limited approach” that SANDAG has undertaken in its analysis of whether the localized air pollution resulting from the Draft RTP/SCS is significant under CEQA.

The Attorney General also expressed concern about the increase in GHGs that will result from this project, and notes that “California is already seeing the effects of climate change.” In particular, the Attorney General finds that the “[Draft] RTP/SCS seems to be setting the region on a course that is inconsistent with the State’s climate objectives.” VMT will increase by 51% by 2050, and levels of GHGs, as measured in metric tons, will begin increasing in 2035. While the Draft RTP/SCS may show that GHGs will decrease in the short term, “SANDAG must make a determination whether the project as a whole has significant climate effects.”

**D. Environmental Justice**

Many of the public comments expressed concern over the RTP/SCS’s effects on lower-income and other sensitive communities, which is a component of a CEQA analysis. Similarly, while the Attorney General’s letter conveys concern about the serious health effects that unsafe levels of pollutants have on the entire population as a whole, the letter also specifically notes that lower-income; already heavily-burdened populations suffer the effects of pollution at higher levels than those who live in higher-income communities.

The Attorney General urges SANDAG to identify sensitive communities and analyze how the health of the residents in these communities would be affected by this project. Cleaner air results in increased worker productivity, increased agricultural outputs, and reduced mortality and illness. Diesel particulate emissions, ozone, and other particulate pollution all have drastic health effects on humans, including cancer. “[T]he burdens of climate change will not be shared equally” as climate scenarios show that the effects of climate change disproportionately affect the

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32 Letter from AG Harris at 2-3.
33 Letter from AG Harris at 7.
34 Letter from AG Harris at 8.
35 Letter from AG Harris at 9.
36 See, e.g., Response to comments at 2 (Comment 17), 4 (Comments 44, 49, 52), 5 (Comment 57).
37 Id. at 4.
38 Id. at 4.
40 Letter from AG Harris at 5.
urban poor, the elderly, children, traditional societies, agricultural workers, and rural populations.\textsuperscript{41}

III. Conclusion

The public has expressed considerable concern about the Draft RTP/SCS. These concerns and comments have ties to the DEIR, and its inadequate consideration of air quality, improper performance metrics and quantification, and lack of consideration of impacts to lower-income and sensitive communities. The Sierra Club recommends that SANDAG consider and address the public's concerns that address both the RTP/SCS and its DEIR. The Sierra Club further urges SANDAG to release a final RTP/SCS that diverges from a "business-as-usual" approach that embraces a full suite of emission-reducing alternatives.

Respectfully Submitted,

\begin{flushright}
Pamela N. Epstein, Esq., LL.M  
Staff Attorney & Legal Program Manager  
Sierra Club, San Diego Chapter  
pepstein@sierraclubssandiego.org  
8304 Clairemont Mesa Blvd., Ste 101  
San Diego, CA 92111
\end{flushright}

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.

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\caption{Sierra Club}
\end{figure}

\textsuperscript{41} Id. at 7 (citing Office of Environmental Health Hazard Assessment, \textit{Indicators of Climate Change in California: Environmental Justice Impacts} (Dec. 2010) at 2).
Via Email (twr@sandag.org)

October 26, 2011

Honorable Chair Jerome Stocks, Board of Directors
SANDAG
401 B Street, Suite 800,
San Diego, CA 92101

Re: Comments on SANDAG’S 2050 RTP/SCS.

Dear Chairman Stocks and Honorable Members of the Board:

On behalf of the Surfrider Foundation and its 50,000 members, thank you for the opportunity to comment on SANDAG’s 2050 RTP/SCS/EIR. The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world’s oceans, waves and beaches. Surfrider Foundation now maintains over 90 chapters worldwide and is fueled by a powerful network of activists. At this time, we are limiting our comments to: the inclusion of the proposed Foothill-South Toll Road (Route 241 from Interstate 5 to Oso Parkway) and our concerns about Greenhouse Gases (GHGs) as contained within SANDAG’s 2050 RTP.

Upon reviewing public comments that were submitted on the Draft EIR we concur with the remarks rendered by both the California Fish and Game Department and the California Coastal Commission that the Foothill-South Toll Road should not be included the 2050 RTP.

The Toll Road Has Been Found Not to Comply With State and Federal Environmental Law. Agencies at both the state and federal levels have rejected the proposed Foothill-South Toll Road. In February of 2008, the California Coastal Commission denied the Transportation Corridor Agencies’ (TCA) request for a federal Coastal Zone Management Act (CZMA) consistency certification for the Foothill-South, finding that the road was irreconcilably inconsistent with key provisions of the CZMA, the federal law designed to protect the nation’s coastal zone. In fact, the Commission’s staff report stated that “it would be difficult to imagine a more environmentally damaging alternative location for the proposed toll road.” Ten months later, the U.S. Department of Commerce rejected the TCA’s
appeal of the Coastal Commission’s decision, basing its denial primarily on the availability of less damaging transportation routes.

The very premise of the 2050 RTP is to include projects that are assumed to improve future transportation. The Foothill-South project does not fit the description of future transportation projects. Indeed, the opposite is true. The road has not been cleared for construction and its implementation was disapproved by the Coastal Commission and Department of Commerce based on its harmful environmental impacts.

As mentioned in comment letters submitted by the Coastal Commission regarding SANDAG’s RTP DEIR, there are major impacts to sensitive coastal resources by the Foothill-South and therefore it’s inappropriate and unjustified to include the road in the 2050 RTP. The California Fish and Game also specifically expressed concerns about “lack of documentation” due to an insufficient narrative provided within SANDAG’s DEIR and specifically noted concerns about impacts to species protected under the Endangered Species Act (ESA). Surfrider was not satisfied to review the response from SANDAG staff regarding these agencies concerns. One of the more confounding responses from SANDAG Staff was: “[SR 241 is] considered to be a possible future roadway improvement that could take place within the region, potentially with an alternative alignment or other project modifications”.

At present, no modifications have been made to the road; and most importantly, no substantial funding mechanisms are in place that will actually help construct the road, let alone modify its original engineering plans. It is very concerning that SANDAG’s Board of Directors is about to approve a RTP that contains a road that is deemed illegal under both state and federal law; and that has no potential funding in order to bring the road further to completion.

With regards to Greenhouse Gases (GHGs), the 2050 RTP is overlooking serious implications of climate change. Surfrider is concerned with climate change and GHGs because as the earth undergoes climate change sea levels are expected and this would directly impact oceans, beaches and waves—the very elements our organization seeks to protect.

As background context, and as refereed to in the letter from Attorney General submitted on Sept. 16, 2011, the earth’s atmosphere and oceans are rapidly approaching capacity to absorb GHGs. The saturation of GHGs in both our atmosphere and oceans is undoubtedly going further exasperate climate change. As reported by the Resources Agency in 2009, California is already experiencing sea level rise, coastal erosion, increased average temperatures, more extreme hot days
and increased heat waves, fewer shifts in the water cycle and increases in the frequency and intensity of wildfire. (Resources Agency, 2009 Climate Adaptation Strategy p. 3.) 1

More GHGs will undoubtedly contribute to the aforementioned problems and therefore it is incumbent upon planning agencies like SANDAG to take serious measures to curb GHGs. As mentioned in the Attorney General’s letter, Surfrider also believes it’s imperative to point out the DEIR indicates vehicle miles traveled in San Diego region will increase during the time period of the RTP over the 2010 baseline by 10%, 32%, and 51% in 2020, 2035 and 2050 respectively (DEIR, pp. 4.12-16, 4.12-21, 4.12-24). Clearly more cars on the car will increase GHGs. Surfrider Foundation believes that in order to reduce GHGs that are currently anticipated within your RTP, you must increase rapid transit and decrease vehicle miles traveled in the San Diego region.

Conclusion

Thank you in advance for taking Surfrider Foundation’s comments into account before this very important vote. As mentioned, we are gravely concerned that your planning agency (who is tasked with improving regional transportation and quality of life) is about to include a project that has already been rejected by the Coastal Commission and the Bush Administration. As demonstrated by thousands of people who attended the Coastal Commission and Secretary of Commerce hearings, there is insurmountable opposition to this road and including it in your RTP is poor planning and, with all due respect, out-of-touch with the ‘will of the people’ and modern transportation planning. As Surfrider Foundation continues our mission to protect oceans, beaches and waves we are ever mindful of climate change and the implications of sea level rise, erosion and ocean acidification, therefore we urge to improve your plans to curb GHGs by improving integrated transit infrastructure and lessening vehicle-based transportation (i.e. encouraging more road building). Thank you once again, and please do not hesitate to contact me with questions or comments at: Ssekich@surfrider.org

Sincerely,

Stefanie Sekich-Quinn
California Policy Manager
Surfrider Foundation, HQ

1http://www.climatechange.ca.gov/adaption
Dear San Diego Association of Governments,

Please vote No to the Regional Transportation Plan. As a student who drives and takes the public transportation to school, I don’t believe that this plan will make better our transportation system. Every day I see and suffer the consequences of the poor public transportation that we have. I will support a plan that serves environmental justice communities and improves quality for the entire San Diego region.

-Bianca Alvarado

(San Diego State University student)
From: michael bailey <michaelbailey@cox.net>
To: "Wright, Tessa" <twr@sandag.org>
Sent: Wed, Oct 26, 2011 00:24:24 GMT+00:00
Subject: SB375 RTP/SCS Plan

We need fundamental change in the transportation system in Southern California to reduce GHG emissions and other chemical pollution.
The goal of the RTP/SCS should be to create a public transportation system that is world class and that will satisfy the public so completely that the private car will be the last choice for transportation to be used only in areas with no public transportation available.
This can be done by integrating a good public transit system with bicycle rental/sharing facilities and car sharing facilities at transit hubs like Coaster Stations. More light rail and commuter rail should be added. The most efficient way to move people is by rail. But rail cannot go everywhere; so a good bus system is needed to complement the rail connecting people to homes and jobs from rail stations.
Building more roads increases the wrong kind of development--urban sprawl. Creating the world class public transportation system of tomorrow would stimulate development too; but this development would be concentrated in and near the railroad stations, things would be within a short walk or bike ride of the train depot including housing, jobs, schools, entertainment. This is what is badly needed in Southern California.
Thank you. Michael E. Bailey, 25801 Marguerite Parkway, No. 103, Mission Viejo, CA 92692.
From: WALTER BREWER
To: webmaster@sandag.org
Sent: Monday, October 24, 2011 4:29 PM
Subject: Material For October 28 Directors Meeting.

Please include the assessment below in background material for Directos 2050RTP discussions October 28.

Thank you,

Walt Brewer
catcar38@verizon.net

Please do not approve 2050RTP in its present form.

It sets a poor example for other MPO's that follow.

Corrections to two fundamental discrepancies provide conclusive evidence 2050RTP requires drastic change before approval.

1). It is NOT a “balanced” Plan just because funds for new mass transit, and for new roads are nearly equal.

In PERFORMANCE it is a drastically out of balance Plan.

Mass transit provides only 5% of transportation energy reduction and associated emissions while spending about 45% of funds.

95% comes from the already approved first modest step for on-road motor vehicles energy use improvement.

Mass transit absorbs only 4% of travel growth. Equivalent to less than 2 years growth for the overall Region.

Despite very optimistic ridership assumptions mass transit overall travel share is only 2.5%.

To provide small increments in energy reduction, and in Regional travel, mass transit cost is 20 TIMES that for investment in roads.

The entire contribution to Regional transportation from the mass transit oriented Sustainable Communities Strategy can be achieved with a one mpg improvement in on-road vehicles.

Thus the elaborately promoted SCS has failed to provide meaningful contribution to 2050RTP’s priority to reduce transportation energy and GHG. It should be removed and concentrate on other forms of energy savings...
2), 2050RTP DOES create additional traffic congestion compared to the Plan's 2008 reference year for other comparisons.

Examples; Work trips take about 10% longer. Auto travel in peak hours congestion increases 28%. All day it increases 70%.

2050RTP’s comparison with a much higher congestion level in a meaningless hypothetical case of not adding any to mass transit or roads is simply disingenuous, and possibly interpreted to cover 2050RTP’s apparent violation of congestion relief promised 2004 voters in the TransNet II Ordinance. $200+ billion would still be spent for tiny improvements in this curious calculation.

Fortunately the basis for essential revisions in both cases lie in 2050RTP’s own proof that energy savings are dominated by improvements already underway in motor vehicle personal transportation, vital to Regional function and overwhelmingly the public preference.

Shifting most mass transit funds to support these improvements including roads already on SANDAG’s list also includes probable introduction of automated even more efficient, safer personal transportation beginning to appear.

Remaining mass transit support can concentrate on better access for non-drivers and very low income travelers. Also express routes between a very few high activity centers.
From: Jay Corrales <jay@trealestate.net>
To: "jstocks@ci.encinitas.ca.us" <jstocks@ci.encinitas.ca.us>, "Gallegos, Gary" <gga@sandag.org>, "Wright, Tessa" <twr@sandag.org>
Sent: Wed, Oct 26, 2011 19:01:36 GMT+00:00
Subject: Re: 2050 Regional Transportation Plan

All I have to say about the 2050 Regional Transportation Plan is, you can do better. I know you know how to do better.

Sincerely,

Jay Corrales
760-433-1505
October 24, 2011
Bonnie and Joe Cucera from Vista
Phone Message
(760) 803-6138

She made the following comments:

We live in Shadow Ridge in Vista. We are pleased to see more pedestrian and bike infrastructure. Would like to see an increase in public transportation connections. Make them frequent and faster. North County to La Jolla to UCSD. We fully support modifying the RTP to put more money into transit.
From: Masada Disenhouse [mailto:mdisenhouse@cox.net]
Sent: Monday, October 24, 2011 4:29 PM
To: jstocks@ci.encinitas.ca.us; Gallegos, Gary; Wright, Tessa; Johnston, Phillip
Cc: acates@ci.santee.ca.us; ron-roberts@sdcounty.ca.gov; bill.horn@sdcounty.ca.gov;
council@carlsbadca.gov; ccox@chulavistaca.gov; cdowney@coronado.ca.us; chilliard@delmar.ca.us;
tbussey@cityofelcajon.us; rekblad@escondido.org; amadrid@ci.la-mesa.ca.us; mnesson@ci.lemon-
grove.ca.us; rmorrison@nationalcityca.gov; jwood@ci.oceanside.ca.us; dhiggenson@poway.org;
JerrySanders@sandiego.gov; anthonyyoung@sandiego.gov; jdesmond@san-marcos.net;
ltheebner@cosb.org; jritter@cityofvista.com; JJanney@cityofib.org
Subject: Please vote no on the RTP & revise to address climate change

Dear SANDAG Board Members,

I urge you to vote “no” on the regional transportation plan this Friday. As it stands, the plan fails to meet the California laws regulating greenhouse gas emissions that were passed to ensure the worst impacts of climate change do not occur, as discussed in the recent letter from the Attorney General's office.

As you know, climate change will pose significant implications for our economy, our health and our environment, if not addressed. According to a recent San Diego Foundation report that consulted local experts, wildfires, droughts, and coastal flooding will be more intense and frequent. We are already seeing these effects and they are damaging and costly. This is not a future I want for my community and my family.

While the plan meets some of the short term climate requirements, it fails, even according to SANDAG’s own calculations, in the long term. This is simply unacceptable use of taxpayer funding, both because of the cost of the inappropriate transportation infrastructure, the future costs that will be higher because of current inaction, & exposing the County to potential legal action from the state. The technical ways to address these issues are understood and are doable, and there is time to make some real revisions to the plan. I understand that there will be another revision in 4 years, but honestly, that's just not good enough. 4 years down the wrong path means taxpayer money wasted on the wrong projects and brings us closer to the very real possibility that we will not be able to avoid the worst impacts of climate change.

Please demonstrate the vision and firmness of purpose that you were elected for, and vote against the RTP. Then, revise the RTP to ensure it addresses these important issues and is able to chart a truly sustainable economy and environment for us and for future San Diegans.

Thank you very much,

Masada Disenhouse
9380 Alto Drive
La Mesa, CA 91941
619-335-1285
mdisenhouse@cox.net
From: T Todd Elvins [mailto:todd@cleanventure.org]
Sent: Tuesday, October 25, 2011 1:29 PM
To: Vanegas, Hector; Vigil, Domingo; Martin, Andrew
Subject: please vote no on RTP

Dear Hector,

I'd like to ask you to please vote no on the regional transportation plan. The plan does not meet the California laws regulating emissions.

I believe that Climate Change is the greatest challenge facing man today and it is possible that the earth could become uninhabitable within a century or two.

Sincerely,

--
T. Todd Elvins PhD - CEO
CleanVenture - Accelerating Green Innovations
www.cleanventure.org
todd@cleanventure.org
858 205 0724 (p)
Dear SANDAG Board Members,

San Diego County is the first to implement SB375 which lays out GHG emissions reduction requirements, so many communities throughout the state will take the lead from our actions and it’s important we get it right.

Vote to not approve the regional transportation plan (RTP) this Friday. As it stands, the plan fails to meet the California laws regulating greenhouse gas (GHG) emissions that were passed to ensure the worst impacts of climate change do not occur, as discussed in the recent letter from Kamala Harris, California’s Attorney General.

As you know, the impacts climate change will pose for San Diego county if we don’t act now are that wildfires, droughts, and coastal flooding (some beaches will disappear) will be more intense and frequent, temperatures will be more extreme, and native plants and animals will disappear. This is not a future I want for my community and my family.

Additionally, the RTP fails to address real transit needs in San Diego County. I don't use the bus or the trolley because they take too long and I am hesitant to ride my bike much of the time because it is dangerous.

Finally, a majority of San Diego county residents like me voted down Proposition 23 and supported California’s GHG laws. I urge you to represent your constituents and vote to delay the RTP until it is revised to ensure it addresses these issues.

Sincerely,

Daria Flores

4429 New Hampshire St.

619 542-0030
From: Sierra Club Membership Services [mailto:membership.services@sierracrefund.org] On Behalf Of Derek Gendvil
Sent: Tuesday, October 25, 2011 6:10 PM
To: 2050RTP
Subject: Make San Diego a More Sustainable Community

Oct 25, 2011

SANDAG Board of Directors and Staff

Dear SANDAG Board of Directors and Staff, Board of Directors and Staff,

Thank you for taking an aggressive approach to reducing greenhouse gas emissions in your Sustainable Communities Strategy. I applaud your proactive approach to meeting the California Air Resources Board targets of reducing our emissions by 14% by 2020. It will take this kind of pollution reduction to keep San Diego a healthy, prosperous and pleasant place to live and visit.

SANDAG should extend this trajectory beyond 2020 and into 2035. By continuing to prioritize transit and infill development over freeways and sprawl, San Diego County can reduce greenhouse gas emissions by far more than 13%.

SB 375 means that metropolitan planning organizations must change direction and stop the unnecessary and unhealthy sprawl that has characterized California. San Diego must not use projected population increase as an excuse to allow more sprawl, but rather as an opportunity to create more walkable and bicycle-friendly urban communities.

Freeway expansion in San Diego is unnecessary and irresponsible, given our climate change responsibilities. SANDAG should instead pursue alternative methods to alleviate traffic congestion: such as adding additional transit routes, increasing the frequency of service, utilizing the complete streets model of development and pursuing strategies to unbundle the cost of driving and parking a car. This approach represents effective, economically sound, and environmentally conscious alternatives to business as usual.

I would like to extend thanks to the staff who prepared the draft Regional Transportation Plan and the Sustainable Communities Strategy, and I look forward to the upcoming workshops to address these issues.
Thank you!

Sincerely,

Mr. Derek Gendvil
9030 W Sahara Ave # 360
Las Vegas, NV 89117-5744
(702) 290-2013
> Please see to it that the answer is NO on the 2050 RTP/SCS/EIR.
> There are better alternatives.
> Diane Janssen

diane janssen

"There is nobody in this country who got rich on his own. Nobody. You built a factory? Good for you! But I want to be clear. You moved your goods to market on the roads that the rest of us paid for. You hired workers that the rest of us paid to educate. You were safe in your factory because of police forces and fire forces that the rest of us paid for. You built something terrific...God bless! Keep a big hunk of it. But part of the social contract is that you take a hunk and pay it forward for the next kid who comes along." - Elizabeth Warren (My Hero!)
From: Donna Jones <DJones@sheppardmullin.com>
To: "Wright, Tessa" <twr@sandag.org>
Sent: Wed, Oct 26, 2011 17:39:06 GMT+00:00
Subject: Road improvements

Please do not forget that not everyone will ever use transit, even if it is widely available, which it likely will never be unless we intend to condemn homes and businesses and spend billions in putting in rail lines in places that would reach most businesses, attractions, etc. Given the outcry over CCDC condemning one property that is unlikely to happen. But, again, even if it did, there is still a need for roads.

So even if the Transit First folks are the most vocal ones, I want to put in a word for Roads. I drive at least 1-1/2 hours on them every day to and from work, and my commute down 1-15/163 has actually gotten worse since the fast track lanes were extended for some reason (can't explain why). Whereas on most days I could previously make it from North Poway to downtown in 35 minutes, it now generally takes 40-45 (and I pay to use Fast Trak almost its entire length). And lately you've been quick to make the Fast Track lanes HOV only, which is another issue with me, but best left for a later email.) To leave a cushion I have to leave an hour early, which is a huge waste of time better spent working productively or, even better, sleeping (so that then I can work productively during my waking hours, at least theoretically).

So, not Transit First but a Balance of Transit and Roads would be great.

Thanks,

Donna

Donna Jones
619.338.6524 | direct
619.515.4141 | direct fax
DJones@sheppardmullin.com | Bio

SheppardMullin
Sheppard Mullin Richter & Hampton LLP
501 West Broadway, 19th Floor
San Diego, CA 92101-3598
619.338.8500 | main
www.sheppardmullin.com

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Attention: This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.
Hi SANDAG Board Clerk,

I'm writing to you to ask that you please vote No on the 2050 Regional Transportation Plan. As written, it is not concise enough and omits some obvious points to ensure we all have a bright, clean and healthy future. None of us want to spend large amounts of money that do not accomplish our goals. Please ensure that plan includes the following before you pass it:
- Optimizes transit for the public as efficiently as possible, while most importantly reducing harmful air pollution and greenhouse gas emissions,
- Creates an environmentally sustainable transportation network
- Serves environmental justice communities and improves air quality for the entire San Diego region.

Thank you for your time and I look forward to hearing of our near-future triumphs!

Valerie
From: Claire [mailto:clairemcg@roadrunner.com]
Sent: Monday, October 24, 2011 1:31 PM
To: jstocks@cl.encinitas.ca.us; Gallegos, Gary; Wright, Tessa; Johnston, Phillip; chilliard@delmar.ca.us; lheebner@cosb.org
Cc: Don Mosier
Subject: vote NO on proposed Regional Transportation Plan

Dear Members of SANDAG,

First, thank you all for your service to the public good.

As a resident of Del Mar and a taxpayer of Del Mar and Solana Beach, I am asking you to please vote "NO" on the proposed Regional Transportation Plan (RTP). My concerns are primarily grounded in the health of the citizenry, and in particular, the health of my children and grandchildren, all of whom live in San Diego County.

As proposed, the RTP would not decrease greenhouse gas emissions, but rather would cause to increase those emissions. My two grandsons both require the occasional use of an inhaler due to those emissions. The incidence of asthma in children has increased, and will continue to increase further as our air quality gets worse. Please, for the sake of my grandsons, vote "No" on this RTP. If not for them, please vote "No" now and insist on a stricter RTP, for the good of all San Diegans, for our tourists, and for the region.

I have spoken with many people in Del Mar and Solana Beach about the RTP, and not one of those persons is in favor of the proposed RTP. Please listen to the Attorney General and revise the plan. Please be responsible to the residents of San Diego County, and do not approve the proposed RTP

Thank You,
Claire McGreal
1135 Stratford Ct., Del Mar CA 92014
From: Sierra Club Membership Services [mailto:membership.services@sierraclub.org] On Behalf Of Shannon Milhaup
Sent: Wednesday, October 26, 2011 8:41 AM
To: 2050RTP
Subject: Make San Diego a More Sustainable Community

Oct 26, 2011

SANDAG Board of Directors and Staff

Dear SANDAG Board of Directors and Staff,

Thank you for taking an aggressive approach to reducing greenhouse gas emissions in your Sustainable Communities Strategy. I applaud your proactive approach to meeting the California Air Resources Board targets of reducing our emissions by 14% by 2020. It will take this kind of pollution reduction to keep San Diego a healthy, prosperous and pleasant place to live and visit.

SANDAG should extend this trajectory beyond 2020 and into 2035. By continuing to prioritize transit and infill development over freeways and sprawl, San Diego County can reduce greenhouse gas emissions by far more than 13%.

SB 375 means that metropolitan planning organizations must change direction and stop the unnecessary and unhealthy sprawl that has characterized California. San Diego must not use projected population increase as an excuse to allow more sprawl, but rather as an opportunity to create more walkable and bicycle-friendly urban communities.

Freeway expansion in San Diego is unnecessary and irresponsible, given our climate change responsibilities. SANDAG should instead pursue alternative methods to alleviate traffic congestion: such as adding additional transit routes, increasing the frequency of service, utilizing the complete streets model of development and pursuing strategies to unbundle the cost of driving and parking a car. This approach represents effective, economically sound, and environmentally conscious alternatives to business as usual.

I would like to extend thanks to the staff who prepared the draft Regional Transportation Plan and the Sustainable Communities Strategy, and I look forward to the upcoming workshops to address these issues.

Sincerely,

Miss Shannon Milhaup
740 W Fulton St Apt 601
Chicago, IL 60661-1054
(773) 915-3712
Good morning,

Could you please forward my email to the Board at SANDAG prior to the vote to adopt the 2050 RTP? Thanks.

Dear Board members,

I've been following the RTP process with much interest. As I am not a transportation expert, my learning curve in learning the various components about the RTP has been very steep and very challenging. I also listened to the interview between Board Chair Jerome Stocks and Elyse Lowe recently aired on KPBS. While I have heard the oft repeated statement that the plans calls for a balanced approach, devoting 50% of projected revenue toward transit 30 years down the road and 1% of projected revenue toward bicycle and pedestrian infrastructure is not sufficient to meet San Diego's needs.

The following short video highlights the downsides of highways, and why moving beyond the highway sytem of design is important if we are to retain our vitality and appeal on an international scale.

http://vimeo.com/21509646

I presume that most of you are more experienced in transportation issues including the notion of induced demand. So I find it very confusing when the plans continues to call for a transportation system that is predicated on ideals popularized in the last century at the cost of human life, urban design and vitality. Why not emphasize and make concrete plans to redesign our region around transit and other non-motorized forms of transport. Reading over the comments that were submitted to SANDAG, I am struck by the number of comments requesting funds be spent on transit, bikes and pedestrians, and requests that action plans be made to re-prioritize transit, bicycling and walking. Yet, listening to Mr. Stocks responses last night, I was struck by how out of touch Mr. Stocks is with urban design and people-centric architecture. As the Chair, he should know better.

I hope that the Board calls for RTP that has actionable and concrete plans to reduce highway widths, remove freeways and recreate the region to its people rather than automobiles that continue to steal space that rightfully belongs to human beings.

Sincerely,
Samantha Ollinger
619-450-3011
From: Keith [mailto:kpezzoli@gmail.com]
Sent: Friday, October 21, 2011 10:40 PM
To: jstocks@ci.encinitas.ca.us; Gallegos, Gary; Wright, Tessa
Subject: RTP/SCS

Jerome Stocks, Chair
Gary Gallegos, Executive Director
SANDAG Board of Directors Clerk

I am a professor in Urban Studies and Planning at UC San Diego. I've had the pleasure of serving SANDAG in many ways over the past decade. I am writing now to respectfully ask:

Please do not approve the 2050 RTP/SCS/EIR on Oct. 28th. We can do better, much better.

I fully respect how hard it is to do integrated regional planning. I served on SANDAG's RCP Stakeholders Working group back in 2004. I wrote a very favorable Op Ed about the RCP at that time (SD-UT). I organized and hosted a SANDAG Board meeting on our campus, featured in a UCSD-TV documentary (see Ron Roberts at min 6.22). SANDAG's web site links to work we did to help visualize growth in our region. And I provide SANDAG with student interns (some of which have served you extremely well --like Midori Wong) from the field research practicum I teach at UCSD every year.

I am writing now out of my concern over the 2050 RTP/SCS/EIR. The modeling is flawed and the emphasis on highway development is excessive. The 2050 RTP/SCS/EIR was written as if the affluent society we've enjoyed since WWII is still functioning and will continue to function unabated for several decades to come. Wrong! We aren't in Kansas any more, as the saying goes. Its a brave new world. Besides climate change and peak oil, we face peak fresh water, an economy that is failing to create enough jobs, a widening gap between the haves and have nots, serious ecological degradation, and now growing turmoil among protestors who are fed up with the way we produce, govern and share wealth. The modeling you used to create the 2050 RTP/SCS fails to take these epic changes into account. Big mistake!

The depth and urgency of the profound changes taking place in our regional and global economy are ignored at our peril. We need a dramatically different approach to urban and regional planning --including transportation planning. We're in big trouble if the status quo prevails. Unfortunately, the 2050 RTP/SCS/EIR is fundamentally status quo. Fortunately, you've included an explicit focus on equity, I acknowledge this as a promising step forward.

So what do I suggest you do?

Please consider the 50-10 Transit Plan submitted by CNFF as the preferred alternative. And please address all concerns raised by the Attorney General's Sept. 16, 2011 letter before adopting a final plan. It would be a shame for all of you to go down in the history books as the public stewards who simply didn't get it. Don't cling to outdated models. Be brave. Help us get out of the growing mess we're in. Help stop auto dependency. Support the 50-10 plan.

Keith Pezzoli, PhD
858-735-3012

Knowing is not enough; we must apply.
Willing is not enough; we must do --Goethe

Keith Pezzoli, Ph.D.
University of California @ San Diego
Urban Studies and Planning Program, 0521
e-mail: kpezzoli@ucsd.edu
phone: (858) 534-3691

Websites:
The Global ARC
Global Planning Educators Interest Group
Field Research Practicum
Grand Challenges Research Database
Urban World System Course
Superfund Research Translation
Superfund Community Engagement
Multimedia Gallery (video and images)
Oct 25, 2011

SANDAG Board of Directors and Staff

Dear SANDAG Board of Directors and Staff,

Thank you for taking an aggressive approach to reducing greenhouse gas emissions in your Sustainable Communities Strategy. I applaud your proactive approach to meeting the California Air Resources Board targets of reducing our emissions by 14% by 2020. It will take this kind of pollution reduction to keep San Diego a healthy, prosperous and pleasant place to live and visit.

SANDAG should extend this trajectory beyond 2020 and into 2035. By continuing to prioritize transit and infill development over freeways and sprawl, San Diego County can reduce greenhouse gas emissions by far more than 13%.

SB 375 means that metropolitan planning organizations must change direction and stop the unnecessary and unhealthy sprawl that has characterized California. San Diego must not use projected population increase as an excuse to allow more sprawl, but rather as an opportunity to create more walkable and bicycle-friendly urban communities.

Freeway expansion in San Diego is unnecessary and irresponsible, given our climate change responsibilities. SANDAG should instead pursue alternative methods to alleviate traffic congestion: such as adding additional transit routes, increasing the frequency of service, utilizing the complete streets model of development and pursuing strategies to unbundle the cost of driving and parking a car. This approach represents effective, economically sound, and environmentally conscious alternatives to business as usual.

I would like to extend thanks to the staff who prepared the draft Regional Transportation Plan and the Sustainable Communities Strategy, and I look forward to the upcoming workshops to address these issues.

Sincerely,

Mrs. Lee Schwall
2660 Forest Dr
Winston Salem, NC 27104-2032
Dear Secretary of the Board, (Kindly provide to directors.)

Kindly accept my comments on the proposed 2050 plan. I am an asthma sufferer. By focusing more on road building instead of transit solutions, this plan actually can make my health worse as well as other individuals with lung and heart issues.

The priority must be focused planning for more public transit. We simply cannot continue to build, build, build roads. The cost to our health and the air quality of the region is unacceptable. A public health analysis should have been done
Second, this board should not be recommending policies that increase urban sprawl. It’s a well known fact that residential infrastructure puts a huge drain on the economy for underserved places.
Last, more work must be done to create and plan and implement a sustainable public transportation network.
Thank you again for accepting my comments for the record,
Nadine L. Scott, Attorney

Nadine Scott

550 Hoover St.
Oceanside CA 92054
760-757-6685
Shame on SANDAG for so shamelessly ignoring the mandate of SB 375 and the consistent emphasis on transit prompted by stakeholders throughout the drafting of the subject. As a member of a family who has been in San Diego for four generations I am appalled at the callous disregard for the future of the environment and, by extension, that of our upcoming and future generations by condemning them to a future of drastic climate change, increased suffering from allergies and illnesses such as asthma and an irresponsible and unsustainable use of ever scarcer resources. The continued dependence on the automobile and the resultant continuance of developmental sprawl is not the direction that we want to see San Diego, Southern California, indeed our entire state go. Please do not attempt to go against the input of the stakeholders. It is critical that San Diego commit to weaning people from automobiles and back into shared means of transportation and promote urban infill and neighborly cohabitation and more intimate, denser communities.

Mr. & Ms. S. N. Shafi
San Diego stakeholders
From: Bob Silvern [mailto:bobs00@cox.net]
Sent: Wednesday, October 26, 2011 9:26 AM
To: jstocks@ci.encinitas.ca.us; Gallegos, Gary; Wright, Tessa; Johnston, Phillip
Subject: Please VOTE NO on the 2050 RTP

Dear SANDAG Board Members,

Thank you for the significant progress that you have made in the difficult task of defining an RTP which reduces our GHG emissions. Unfortunately, the 2050 RTP falls short in the following areas:

- Fails to reduce our total emissions as defined by AB 32 to 15% below 2005 levels by 2020 (EIR Table 4.8-16)

- Leads to an overall increase in GHG emissions in 2035 compared to 2010 levels (EIR 4.8-23). While the Scoping Plan sets out additional reductions, many of the policies in the Scoping Plan such as cap-and-trade have not been implemented.

- Increases transportation-related emissions in 2050 by 48% over 2010 levels (EIR 4.8-25).

I urge you to reject the current RTP and revise it to address the above issues. Climate change is far too serious an issue to rely on wishful thinking to achieve our goals. We instead need a bold proactive plan which is certain to bring San Diego into compliance with the GHG reduction requirements and serve as a model for California, the United States, and the world.

Sincerely,
Bob Silvern
9380 Alto Dr.
La Mesa, CA 91941
To Whom It May Concern:
In regards to the 2050 RTP, I have many concerns. Rather than list them all, I would like to just emphasize the disappointment I have in the reduction of GHG and VMT. Given the legislation passed (SB375), and the calculations on the 2050 RTP, it appears as though the new transit plan fails to even meet the state requirements in emissions reduction. I am not one to say that planning the transportation for the region is easy, because I know it is not. However, I believe that the targets set by the State are attainable, and if enough planning, and enough sacrificing of highway and street space to make room for mass transit, I think San Diego could exceed those targets. We have the opportunity to be the leader in this realm.

Our plan is going to be the first in the state to implement the SCS strategy and attempt to adhere to the legislative standards. So how are we going to be remembered? Are we going to be the trailblazer that leads MPO's into planning sustainable communities and reducing GHG and VMT? Or are we going to go down as the first failure to meet the minimum standard, increasing emissions over the next 40 years and being listed in history as another region that refuses to plan for the future, but would rather plan to promote cars instead of mass transit and leave our disabled, elderly, and poorer classes struggling to move about the region via our fragmented and infrequent bus and light rail service.

I sincerely hope that the 2050 RTP is revised to be more mass transit oriented, with mass transit being built in the near term versus the end years of the next four decades.

Thank you for your time and consideration.

Ryan Simmelink
From: Amanda Sousa <amandaakabooks@gmail.com>
To: "jstocks@ci.encinitas.ca.us" <jstocks@ci.encinitas.ca.us>, "Gallegos, Gary" <gga@sandag.org>, "Wright, Tessa" <twr@sandag.org>, "Johnston, Phillip" <pjo@sandag.org>, "jerrysanders@sandiego.gov" <jerrysanders@sandiego.gov>
Cc: "mdisenhouse@cox.net" <mdisenhouse@cox.net>
Sent: Wed, Oct 26, 2011 03:52:30 GMT+00:00
Subject: Regional Transportation Plan - SD County

Dear SANDAG Chair Stocks, Executive Director Gallegos and Mayor Sanders,

I appreciate the opportunity to comment on the upcoming meeting for Regional Transportation Plan. I want to express that I feel that the 40 year plan should be much more aggressive in increasing public transportation and bike lanes in San Diego County. Please vote to not approve the RTP which does not meet the needs of the San Diego residents.

Just in the past few weeks the first Mexican trucking company, Transportes Olympic, has been approved to operate long-haul transportation in the US. This opening of the boarders for greater commerce will increase the already congested boarder area in San Diego County. The most efficient way to maximize the freeways for commerce is to provide more efficient public transportation within the city for the residents. I am originally from the Mid-West and travelling through Chicago was always a nightmare. The lack of any efficient public transportation and the massive amounts of commercial vehicles not only created horrible traffic but also increase the amount of emissions in the city. San Diego has the opportunity to revise our RTP to account for this recent development in commercial trucking.

Also, the grading, fill materials and the freeway itself is harmful to our environment and water quality when expanding our roadways. We have a very unique system of watersheds in San Diego County that needs to be better protected. It has been reported that when over 10% of the watershed is paved there is a significant water quality impact of increased oils, heavy metals and toxins. The flow of sediments into the ocean also changes which directly impacts wave quality. I am a surfer who has opposed all of the attempts by the Transportation Corridor Agency from building and extension to the 241 Toll Toad that directly threatens the world class surf break of Trestles. San Diego can revise our RTP plan to better protect our environment and water quality by including more public transit and less roadway expansion projects.

The current RTP is not even supported by the CA Attorney General's office due to the lack of a Draft Environmental Impact Record and the inconsistencies with the State's climate objectives. I feel that the RTP should be revised to meet the needs of San Diego residents so I ask that you vote to delay the RTP.

I appreciate your time.

Thank you,

Amanda Sousa
1251 Hornblend
San Diego, CA 92109
amandaakabooks@gmail.com
PLEASE work with the STATE – there is no time to delay.

You can SEE the research and FEEL the dramatic weather changes here in SD County now.

I want CLEAN AIR, coastal sunshine and beautiful temperate weather again here in San Diego. HELP.

Transportation in San Diego County produces a whopping 46% of overall GHG emissions.

SANDAG has ignored thousands of public comments and a letter from the Attorney General’s office that calls on you/SANDAG to revise the plan.

http://ag.ca.gov/globalwarming/pdf/comments_sandag_rtplan_deir.pdf

With comments like: The SANDAG region has some of the most serious local air quality problems in the State and the nation – in substantial part caused by vehicle emissions.

WORK HARD TO MEET THE GOAL OF THE STATE, FOR SAN DIEGANS – our PARADISE NEEDS SANDAG to Revise The 40 Year Plan.

Maureen Sweeney
Phone 858 523-9100
CHAIRMAN: SD Advertising Fund for Emergencies www.SafeSanDiego.org
From: Michael BuFairy & Lynn Wade [mailto:midwade@sbcglobal.net]
Sent: Monday, October 24, 2011 1:41 PM
To: jstocks@ci.encinitas.ca.us; Gallegos, Gary; Wright, Tessa; Johnston, Phillip;
    JerrySanders@sandiego.gov; anthonyyoung@sandiego.gov
Subject: RTP

Please do not approve the 40 year RTP as it is. We need a real plan to cut down on green house gases.

1. I think we all can do much better with our environmental impact for future generations. Regional Transportation Plan is key because transportation accounts for 46% of GHG emissions in San Diego County.

2. Our family lives in San Diego and bicycle commutes as much as we can. Better more connected bike routes are so important. I know a lot of people who perceive biking as dangerous and won't bike or allow kids to bike. We lose independence on many levels (as an individual youth to an independent nation).

3. Public Transportation is key. We need fast service that goes to a lot of central places. I would go to North County and even L.A. more if I could get there without sitting in traffic or $150 expense for a family day trip. I am sure more people would come south too. To make public transportation commuting viable There needs to be a way to get from the central hub to the workplace. Some countries have rental bikes. Building it would provides jobs too.

4. Roadway expansion is not an idea with the future in mind. It encourages more car trips and keeps us from making the kind of communities where you can live, work and shop close to home.

Lynn Wade, Michael BuFairy & Dustin
Dear SANDAG,

As a concerned citizen who would like to keep living in San Diego, I find the 2050 RTP inadequate and wish for you revise it.

Alternative transit and street safety must be the first priority. The region cannot continue down unsustainable spiral of sprawl. Please make real changes for our future instead of a veiled business-as-usual plan. I alo urge you to seriously consider the **50-10 Transit Plan** drawn up by your earnest and hardworking opponents/critics.

You know even more than I do that San Diego is a growing region and needs proper infrastructure to allow it to grow, however, the 2050 RTP does not even halfway meet what is needed for future growth and demands for better public infrastructure. San Diegans, and Americans more broadly, deserve more.

Dianne Yee
Urban Planning student @UCSD
citymaus.tumblr.com
TO: Board of Directors
FROM: SANDAG Staff
SUBJECT: Responses to Shute Mihaly Weinberger Letter and Materials Dated October 27, 2011

Introduction

At 4:55:52 pm on October 27, 2011, SANDAG received a letter from Shute, Mihaly & Weinberger, LLP on behalf of the Cleveland National Forest Foundation ("CNFF"), Save our Forest and Ranchlands (SOFAK), the Center for Biological Diversity, and Sierra Club. The letter, which is 51 pages long, includes 45 MB of attachments, comprising 897 pages of technical documents. The technical documents were sent via an electronic “drop box”, which did not include the appropriate instructions or passwords to access easily. The “drop box” required the skills of an IT specialist to open. The late letter, coming at the close of business the night prior to the scheduled certification of the EIR and the voluminous comments and attachments do not provide SANDAG sufficient “opportunity to evaluate and respond to them” as fully and completely as required. See Citizens for Responsible Equitable Environmental Development (CREED) v. City of San Diego, 196 Cal. App. 4th, 515.

In sum, the letter calls for SANDAG to prepare a project level EIR for the RTP/SCS which by its very definition is a program document. SANDAG appropriately prepared a Program EIR for the 2050 RTP/SCS.

Almost all the issues raised in this letter were raised in previous letters and responded to in the Final EIR. Additional responses are presented below.

Buildout Analysis

Section II.B of the letter asserts that the EIR has failed to analyze the environmental impacts of the total amount of development that could theoretically result from the 2050 RTP/SCS, or what is described in Chapter 7 of the EIR as the maximum theoretical build out. However, the level of development evaluated in this EIR is based on reasonable projections for development activity anticipated to occur up to the 2050 horizon year. It is highly unlikely that maximum theoretical build out would ever occur, since it assumes that every parcel is developed at the maximum allowed density. Actual development in cities and counties within a region is almost always less than the theoretical limit of development. This is a result of market forces, population growth (including
birth rates and immigration), as well as General Plan policies, building and zoning restrictions, availability of resources, and other federal, State and local regulations. Maximum theoretical buildout of the SCS land use pattern would be extremely unlikely to occur due to these factors, as well as the historical growth patterns in the San Diego region and the current economic climate of the region. Therefore, although the EIR discloses maximum theoretical build out, it is under no legal obligation to analyze the environmental impacts of maximum theoretical buildout.

The approach used in the EIR is also consistent with the CEQA Guidelines and CEQA case law. In Ross v. California Coastal Commission (2nd App. Dist., September 9, 2011, Case No. B225796) Cal. App. 4th, 2011 WL 3966119, the Second District Court of Appeal reasoned that maximum theoretical build out would be unlikely and speculative, and any future development beyond that reasonably assumed in the project description would have to undergo separate environmental review. Additionally, CEQA requires analysis of reasonably foreseeable impacts (see CEQA Guidelines Section 15064(d)). As a corollary to this rule, CEQA does not require analysis of impacts that are too remote or speculative. It is appropriate to discuss reasonable foreseeable growth at the horizon year of the proposed project; impacts beyond this time frame are highly speculative. Similarly, an EIR is not required to assume a worst case scenario (i.e., maximum theoretical build out) and can rely upon reasonable assumptions.

2050 RTP/SCS GHG Emissions Compared to Executive Order Goal

Page 12 of the letter asks for comparison of the 2050 RTP/SCS GHG emissions to the EO 5-3-05 goal of 80% below 1990 levels for 2020. As identified in GHG-1, the total emissions in 2050 for land use and transportation would be 33.65 MMT CO2e, including existing state regulatory measures, technology, and anticipated growth in the region.

EO 5-3-05 calls for GHG emissions to be reduced to 1990 levels by 2020 and 80% below 1990 levels by 2050. Because data are limited for 1990, the California Air Resources Board (ARB) recommends an equivalent metric of 15% below 2005 GHG emissions to meet the 2050 target. As identified in GHG-3, 2005 emissions for land use and transportation total 29.54 MMT CO2e. The EO 5-3-05 target for 2050, therefore, would require land use and transportation emissions to equal 5.02 MMT CO2e.

This information does not change the EIR’s conclusion that the 2050 RTP/SCS GHG impacts are significant and unavoidable.

Air Toxics and Health Risks

Section D(1)(a) of the letter asserts that the EIR does not present baseline information for toxic air contaminants (TACs). This statement is incorrect, as the setting for TACs is described on pages 4.3-7 through 4.3-12 of the Final EIR.

Section D(1)(b) of the letter asserts that the EIR fails to conduct a health risk analysis. As explained in several places in the air quality impact analysis, health risk assessments are feasible only at the project level, when project-specific designs, meteorological condition, and sensitive receptors have been defined. Although the Draft EIR discussion of health risks met CEQA requirements for a Program EIR, additional information on health risks was added to the Final EIR to respond to public comments. The corridor-level analysis presented in the Final EIR is appropriate in scale for a Program
EIR. See the attachment for evidence supporting the EIR conclusion of no disparate impacts on disadvantaged communities.

Conducting a health risk assessment using incomplete information would yield results that would provide a human cancer risk (i.e., additional cancer case per 1 million people) and a health hazard index (i.e., relative hazard index with respect to reference exposure level); however, these results would not capture the actual future conditions of the roadways. That information can only be properly determined once SANDAG modeling and infrastructural decisions for each roadway modeling area are further described. Performing an HRA at a program level would provide results that are speculative and could either over- or under-estimate impacts due to the uncertainty surrounding the specific roadway activities in the future. For these reasons, and to avoid disclosing health impact information that is not based on well-developed assuming, an HRA was not performed for the program-level analysis.

The letter requests that the EIR present a regional health risk analysis by presenting a series of project-specific examples of health risks; however, project level analysis is not required or appropriate for a Program EIR. Further, the AASHTO health risk assessment methods discussed in the letter are specifically intended of project-level analysis.

Agricultural Land Impacts

Pages 30-32 assert that the EIR’s agricultural land conversion estimates are incorrect. Consistent with CEQA Guidelines Appendix G, SANDAG 2050 RTP/SCS threshold AG-1 addresses the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to nonagricultural use. SANDAG used 2008 data compiled by the Department of Conservation FMMP, the latest agricultural data available. The existing acreages presented in the EIR are consistent with this data.

For the future 2020, 2035, and 2050 impact analyses, SANDAG used GIS data and overlaid the regional growth/land use change areas and transportation network improvements over the 2008 FMMP data. Based on this analysis, impacts to each FMMP designated agricultural resource type were identified for each year. Based on this analysis, a total of 3,473 acres of FMMP designated lands were identified as being impacted (under threshold AG-1) by regional growth/land use changes between existing conditions and 2050. Transportation network improvements accounted for another 7 acres of FMMP designated lands, resulting in a total amount of impacted FMMP designated lands of 3,480 acres. This was determined to be a significant impact. State and local programs would reduce these impacts, but not to a less than significant level. Additionally, mitigation measures were identified. However, impacts to FMMP designated lands were determined to be significant and unavoidable.

Similarly, under threshold AG-2, impacts to another approximately 7,030 acres of land were identified. This was determined to be a significant impact. State and local programs would reduce these impacts, but not to a less than significant level. Additionally, mitigation measures were identified. However, impacts under threshold AG-2 were determined to be significant and unavoidable.
As the Lead Agency for it's the San Diego County General Plan Update EIR (August 2011), the County of San Diego chose to broaden the definition of an agricultural resource to include any land with an active agricultural operation, or any site with a history of agricultural production based on aerial photography or other data sources identifying agricultural land uses. The agricultural resources discussed in the San Diego County General Plan EIR include lands within the unincorporated County that are available and suitable for agricultural use, although they may not be in current agricultural use. This broader definition than the threshold used by SANDAG resulted in the County identifying significantly more agricultural lands within the County than the FMMP designated lands analyzed within the 2050 RTP/SCS EIR. However, the SANDAG approach is consistent with CEQA Guidelines Appendix G.

Agricultural resources impacts resulting from transportation improvements represent a small portion of agricultural land conversion when examined in light of the combined impacts expected to occur from regional growth/land use change and transportation improvements combined. Regarding the project specific impact conclusions identified within the following three project EIRs: I-5 North Coast Corridor Project; I-805/I-5 Corridor Project; and SR-11 – Otay Mesa Project - these EIRs all used different sources of data (all older than the 2008 FMMP data) and methodologies than those used by SANDAG. Thus, it is not unusual that the agricultural resources acreages identified within these reports would be different than those that would be reported if they had used the 2008 FMMP data. In some instances, the data used in these EIRs is more than six years older than that presented in the 2050 RTP/SCS EIR. Conversion of agricultural land to nonagricultural use as well as reclassification of lands by the FMMP was likely to occur during this time.

Alternatives

Section I, page 42 of the letter questions why the GHG impacts of the 2050 RTP/SCS are less than that of Alternative 3b: Transit Emphasis/Modified Phasing/Modified Land Use. This is a result of the greater amount of vehicular congestion associated with Alternative 3b. As described in Chapter 6 of the EIR, Alternatives 2a, 2b, 3a, and 3b would cause a substantial increase, a significant impact. Although the 2050 RTP/SCS would substantially increase congested vehicle miles travelled (LOS E and F) in 2050, Alternative 3b would have an even greater significant impact. The greater amount of congestion also results in greater GHG impacts.

Section I, page 42 and 43 indicates that SANDAG has not analyzed a project alternative that is clearly different from and environmentally superior to the RTP/SCS to substantively reduce the significant and unavoidable impacts of the project. The alternatives analysis provided in Chapter 6 of the Final EIR clearly identifies Alternative 5: Slow Growth as the environmentally superior alternative. As described in Section 6.4, page 6-187 of the Final EIR, Alternative 5 would have less environmental impacts than the proposed project for the following environmental topics and is, therefore, the environmentally superior alternative: 1) aesthetics and visual resources; 2) agriculture and forest resources; 3) air quality; 4) biological resources; 5) cultural resources and paleontology 6) environmental justice; 7) geology, soils and mineral resources; 8) greenhouse gas emissions; 9) hazards and hazardous materials; 10) hydrology and water quality; 11) noise; 12) population and housing; 13) public services, utilities and energy; 14) recreation; 15) transportation; and 16) water supply.

Attachment/Enclosure
AQ index LIM Calculations

Each freeway segment from the existing (2010) and SANDAG RTP revenue constrained highway network was assigned an air quality score from 3 to 9 (three being the least impact on AQ, 9 the most) based on methods described in (Grace) for 2010 and 2050. Segments vary in length, but typically extend between crossing surface streets. The segments were then assigned as either Low Income-Minority (LIM) or Non-LIM based on whether or not they intersected a geography designated as LIM (see notes below for LIM definition). LIM communities were determined at the Master Geographic Reference Area (MGRA) level geography based on demographic projections for 2050 from the Regional Growth Forecast. MGRAs are roughly the size of census blocks in urban areas and census block groups in rural areas.

This intersection was performed with both the line segment representing the freeway and the mid-point of the freeway segment. Total mileage by AQ score was calculated for LIM and Non-LIM categories. No major differences in total mileage were observed between the segment and midpoint methods.

The AQ_LIM Analysis table shows the results of the calculations for both intersection methods for 2010 and 2050. The single year tabs list segment count (frequency), mileage, percent of mileage for a given AQ Index category, and percent of overall freeway miles. These are broken out by LIM status as well as AQ Index score. The 2010 to 2050 tabs list the overall change in mileage, the percent of change in miles for a given AQ index category, and a percent of change in miles for the overall freeway network. These are also broken out by LIM status and AQ Index score.

LIM communities must meet at least one of the following criteria:

Low Income Community of Concern: any community in which 33 percent or more of households are low income, and/or 10 percent or more of the households are severely overcrowded, and/or 25 percent or more of the population is in poverty.

Minority Community of Concern: any community in which 65 percent or more of the population is non-White.
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## Jobs and Health Impacts for Poor and Minorities

**SANDAG Board Meeting**  
**October 28, 2011**  
**Regional Transportation Plan**  
**Anne Tolch**

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### Source: State of California Employment Development Department

### Jobs and Employment Impacts for Poor and Minorities

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<th>Employment</th>
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<tr>
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<td>43,600</td>
<td>5,500</td>
<td>11.0%</td>
</tr>
</tbody>
</table>

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Jobs Trends and Opportunities

- Climate change will result in job losses in the agricultural and tourism sectors, which employ a large number of minorities.
  Source: The Climate Gap

- *Public transportation creates 31% more jobs per dollar than the construction of new roads & bridges.*  Source: Lessons from the Stimulus

- The investments we make today will determine jobs available tomorrow.

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San Diego County GHG Emissions by Category (2006)

Source: EPIC San Diego County Greenhouse Gas Inventory
- Climate Change-
Poor and Minorities Hardest Hit

The Climate Gap, New America Media, News Report May 29, 2009
• Climate change harms public health and raises the costs of food and water.
• Greatest burden falls on communities of color and the poor.
• Air pollution worsens with warming temperatures.
• African Americans in Los Angeles twice as likely to die from heat wave-related illnesses.
• Latinos had highest rate of emergency room visits and hospitalizations during the 2006 California heat wave.
• The risk of death because of heat wave-related illness is also higher for infants, the elderly, people with chronic conditions, and those without air conditioning or access to transportation to cooler places.
Quality of the Air in San Diego County

Presentation to
San Diego Association of Governments
October 28, 2011

Topics

- Air Agencies & Roles
- Air Quality Achievements
- Challenges
Key Air Agencies

Federal – U.S. EPA
State – CA Air Resources Board
Local – Air Pollution Control District
Ozone Levels
8-hour Average Value in Each Year

Ozone Improvement Despite Growth

Vehicle Miles Traveled
(millions/day)

Countywide Population (100,000s)

Days Over Federal 8-Hour Ozone Standard
(75 parts per billion)
Fine Particulate Matter ("PM2.5")

Toxic Air Contaminants
Incremental Cancer Risk
Diesel Particulate Matter Monitoring Stations

Diesel Particulate Matter Monitoring Results

- Lower than previously estimated
  - Regionwide Cancer Risk estimated at 420 cancer cases per million people (if 70 years of exposure)
- Measurements in 2010 average 354/million
  - Escondido: 343/million
  - Barrio Logan: 343/million
  - El Cajon: 374/million
Challenges & Expectations

- More stringent air standards
- Impacts of growth
- Further air quality improvement

Conclusions

- Air pollution control program is working
- Air throughout region is getting cleaner
- Regionwide air quality cleanest on record
Thank you.

Robert Reider, Planning & Rules Manager
San Diego County Air Pollution Control District
10124 Old Grove Road, San Diego, CA 92131
858-586-2640
Robert.Reider@sdcounty.ca.gov
October 27, 2011

Mr. Gary L. Gallegos  
Executive Director  
San Diego Association of Governments  
401 B Street, Suite 800  
San Diego, CA 92101

Dear Mr. Gallegos:

I am writing in support of the Final 2050 San Diego Regional Transportation Plan (2050 RTP) and the Sustainable Communities Strategy. I commend SANDAG’s multimodal approach to transportation planning which provides mobility options while protecting the environment and ensuring economic prosperity throughout the region. NCTD supports the use of strategies that will manage automobile demand on major corridors throughout the region, while simultaneously making improvements that support increased transit utilization. Given the structure of our transportation network in Northern San Diego County, capital improvements throughout the region will provide enhanced travel choices to the community.

Over its 30 years of operation, NCTD has successfully built a strong and viable transit network serving the citizens of the Northern San Diego County. NCTD is a multimodal system that features the BREEZE bus system, the COASTER commuter rail service, the SPRINTER light rail line, and LIFT paratransit service. The system carries more than 12 million annual riders in a service area that stretches over a 1,000 square miles of Northern San Diego County. Our mission is to deliver safe, convenient, reliable and user-friendly public transportation services. We continually work to build an integrated transit system that enables our customers to travel easily and efficiently throughout our growing region. Over the past year NCTD has been able to lower fares while increasing service levels.

Double tracking the coastal rail corridor, as included in the 2050 RTP, will allow NCTD to continue to improve the quality of service and increase the frequency of service along the corridor. Capital improvements in the coastal rail corridor are already under way. NCTD and SANDAG have been working closely on 20 individual rail projects worth an estimated $800 million, and six of these improvement projects are in construction or construction ready. More than half of the project funding has been identified to date, with completion expected in the next five years with full funding specified in the RTP. The phasing of the improvements to the coastal rail corridor allows us to avoid impacting the current rail operations, which in turn reduces the number of cars on our roads on a daily basis. Given the number of projects already under way, along with our ongoing maintenance and state of good repair efforts, the number of new projects that could be added for construction during the near-term of the RTP has to be carefully evaluated.
We also look forward to increasing our service on the SPRINTER with the completion of that double-tracking project in the next fifteen years. These capital improvements, coupled with sufficient operating funds, will allow NCTD to increase service throughout the corridor.

NCTD supports the implementation of managed lanes in the I-5 North Coast Corridor (NCC) and use of managed lane revenue for transit funding support. Consistent with existing state law, excess revenue (after expenses related to debt service and facility maintenance) are required to be used to improve public transit services (including construction and operations of capital facilities) that operate within or in close proximity to this multimodal corridor. Below is a list of improvements that NCTD could make using the revenue from the I-5 managed lanes. These improvements would increase capacity and efficiency of the rail corridor and would provide improved travel choices for the region.

- Route 101 headways could be increased during the peak from 30 minutes to 15 minutes at a cost of $980,000 annually.
- Mid-day COASTER service consisting of 4 round trips during the weekday for $1.45 million annually.
- Add Sunday COASTER service year round for $700,000.
- Extend COASTER service to Fullerton (Orange County), providing 6 weekday round trips for $1.7 million annually.
- Improve capital facilities (including improving parking capacity) and provide significant improvements for last mile, shuttle services.

On balance, the 2050 RTP provides a reasonable approach to meet our future transportation needs. The 2050 RTP, like any good plan, will be reviewed periodically, and adjustments will be made to ensure that our region has a transportation system that provides mobility choices for our community. NCTD looks forward to working with SANDAG to provide enhanced travel choices throughout San Diego County.

Sincerely,

Matthew O. Tucker

cc: NCTD Board of Directors
SANDAG Board of Directors
October 28, 2011

Honorable Jerome Stocks
Chair, Board of Directors
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

RE: 2050 Regional Transportation Plan/Sustainable Communities Strategy and Final Environmental Impact Report

Dear Chairman Stocks and Members of the Board,

The San Diego Chapter of Sierra Club submits the following letter on the Final Environmental Impact Report ("FEIR") for the proposed 2050 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS" or the "Plan" the "Project"). The San Diego Chapter of the Sierra Club ("Sierra Club" or the "Club") has over 15,000 members in the San Diego area who rely on transportation infrastructure and transit on a daily basis. The Sierra Club urges the San Diego Association of Governments ("SANDAG") to deny approval, and delay and further consideration of the plan and its associated FEIR until such a time that the EIR fully complies with the California Environmental Quality Act ("CEQA").

This comment letter is intended to supplement, previous comment letters previously submitted by Sierra Club and Shute, Mihaly, and Weinberger, LLC, on behalf of Sierra Club to the SANDAG Board on the RTP/SCS and its associated environmental documents. These letters are hereby incorporated by reference. Sierra Club further incorporates into the record a letter from the Environmental Health Coalition to the SANDAG Board (attached as Appendix B).

I. SANDAG Has Failed to Respond to Numerous Public Comments on the 2050 RTP/SCS Document Underlying the FEIR And Has Inappropriately Bifurcated Its Consideration of the FEIR.

SANDAG states that "[a]bout 4,000 public comments from nearly 1,500 individuals and
organizations were received on the Draft RTP and its SCS. The Sustainable Communities and Climate Protection Act of 2008 (SB 275) requires that Metropolitan Planning Organizations (MPOs, also known as Regional Planning Authorities, or RPAs) allow the public to comment on the plan. This public comment requirement is significantly less than its CEQA counterpart. Good public policy would dictate that in circumstances where two interdependent documents have varying standards of review, the stricter standard should prevail.

A. The Requirements of CEQA With Regards to Responding to Public Comments

CEQA, the "touchstone" of California's environmental legislation, requires environmental accountability throughout the planning and decision-making stages of major development. The comment and review process enables citizens to "make important contributions to environmental protection" and facilitates "notions of democratic decision-making." An EIR is a document that represents accountability since it must be certified or rejected by public officials. CEQA should be "scrupulously followed" so that "the public will know the basis on which its responsible officials either approve or reject environmentally significant action" and therefore, find themselves in a position to "respond accordingly to action with which it disagrees."

The Club questions the reasonability of the 10-day time period for the public to review and comment on the FEIR, as the FEIR comprises of nearly 1,200 pages. This them limited review period is not only burdensome but clearly inconsistent with CEQA goals and requirements. The Club also questions whether it is possible for the decision-makers themselves, the SANDAG Board of Directors, to read and digest all of the FEIR materials in time for the October 28, 2011 meeting, a scant 10 days after the document was finalized and release for their and the public's review. This severely abbreviated schedule prevents achieving the most important goal of CEQA: informed and careful decision-making. It also call into question whether the Board members can appropriate carry out their board member responsibilities by taking final action on the FEIR and related Project approvals.

As a result, SANDAG board members have a clear fiduciary duty to read and understand all of the materials related to the Plan prior to voting. Burdened by the same artificial 10-day public review period constraint as the public, the board members are not in a position to fulfill this fiduciary obligation. The Club respectfully requests that each board member indicate, on the record, whether he or she: (1) has read all the documentation in the record including the FEIR (2) understands the issues and (3) has had an opportunity to have any questions answered to the board member's satisfaction. If any board members cannot in good faith, and on the record, answer "yes" to these questions, then the Board itself should continue the matter. Good government requires no less.

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6 Cal. Gov’t Code § 65080 et seq.
7 Cal. Gov’t Code § 65080(b)(1)(M).
10 Laurel Heights Improvement Association v. Regents of the University of California, 764 P.2d 278, 282-83 (Cal. 1988).
CEQA Guidelines § 15088 discusses the methods used to evaluate and respond to DEIR comments (emphasis added):

The Lead Agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response ... The written response shall describe the disposition of significant environmental issues raised ... the Lead Agency's position varies from recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. *Conclusory statements unsupported by factual information will not suffice.*

CEQA provides a clear mandated to provide detailed response to comments. The Club submitted an extensive comment letter on the DEIR that raised a numerous legal inadequacies from the Plan’s continued business as usual approach embracing a highway-centric design to negligible land use changes. The responses to the Club’s comments, as well as others, in the FEIR utterly fail to remedy the fatal deficiencies in the EIR. The resulting FEIR not only failed to address and adequately respond to issues raised in the comment letters, but also took active steps to defend the flawed assertions of the DEIR.

**B. SANDAG Improperly and Arbitrarily Designated Many Comments That Concerned the Significant Environmental Impacts as Comments to the 2050 RTP/SCS Rather than the EIR.**

As the response to public comment requirements under SB 375 are significantly less stringent than the response to public comment requirements under CEQA, there may be a natural tendency for MPOs/RPAs to prefer responding to comments that address the RTP/SCS itself and not the RTP/SCS’s DEIR in order to save time, money, and “cut through the red tape.” However, this is inappropriate and a patent violation of CEQA as the RTP/SCS itself if the project description thereby any comment effecting the project description having an effect environmental impacts must be assessed through the EIR.

It is unreasonable to require members of the public to know that when they are commenting on the environmental impacts of a proposed RTP/SCS that they have to send two copies of the same comment letter, one stating that it applies to the DEIR, to the planning organization that drafted the RTP/SCS. Hundreds of members of the public took time to voice their concerns about the environmental impacts of SANDAG’s Draft 2050 RTP/SCS. This includes concerns about air quality and environmental justice. While not expressly stating that they were also commenting on the DEIR, their comments provide clear evidence that they were also reasonably attempting to comment on the DEIR.

There were several instances where the response to attempted DEIR comments only contained the phrase “comment noted.” Such an extensive use of “comment noted” in response to substantive public comments on the Draft RTP/SCS and DEIR lack a good faith, reasoned analysis. Examples of the overuse of “comment noted” in response to public comments include:

- Comments 79 and 80 from the American Lung Association in California, which emphasize the importance of reducing VMT to achieve reductions in ozone, particle...
emission, and greenhouse gas emissions, which would reduce suffering to people with asthma and respiratory illness and to prevent future illness;\textsuperscript{11}

- Comments 121 and 124 from the California Coastal Commission, which stress the importance of regional public transit along coastal areas as opposed to focusing on private transportation, which can more substantially impact coastal areas;\textsuperscript{12} and

- Comments 1368-1375 by the City Heights Community Development Corporation, which stresses the health consequences of automobile transportation and reduced economic impact per taxpayer dollar spent on automobile transportation as compared to public transportation.\textsuperscript{13}

In other responses to comments, SANDAG staff either failed to address or entirely ignored the issue identified and did not fulfill the CEQA requirements. Some, but certainly not all of such comments include:

- Comment 1672 complains about the use of highway expansion as a means of reducing emissions and that seventy-two percent (72\%) of the transit budget is pushed off to the last two decades of the RTP. Yet, the response states “more than 75 percent of the proposed transportation investments in the plan support new transit infrastructure and service new carpool lanes.” Carpool lanes require highway expansion, so in essence SANDAG is responding to a complaint criticizing highway expansion with an acknowledgment that it is expanding highways. In addition, this comment response does not discuss the issue that 72\% of the proposed transit budget does not manifest until 2030.\textsuperscript{14} Moreover, the analysis fails to address the impacts to the entire transportation system and how it translates to a more effective movement of goods and people.

- Comments 1646-1666 from the Linda Vista Collaborative discuss various environmental justice issues.\textsuperscript{15}

- Comments 1876-1884 from the San Ysidro Community Planning Group discuss various environmental issues, including air quality and environmental justice.\textsuperscript{16}

- Comment 17 touches upon an environmental justice issue when it states “we need more and from low-income areas to job and entertainment centers.”\textsuperscript{17}

This is by no means an exhaustive list of the comments to the 2050 RTP/SCS that address environmental issues. The logical conclusion would be that these comments simultaneously address the corresponding DEIR. Comments that address the environmental impacts of the Draft RTP/SCS

\textsuperscript{11} Response to Comments at 9.
\textsuperscript{12} Id. at 16-17.
\textsuperscript{13} Id. at 148.
\textsuperscript{14} Response to Comments at 195.
\textsuperscript{15} Id. at 190-93.
\textsuperscript{16} Id. at 227-32.
\textsuperscript{17} Id. at 2.
should be considered comments on the DEIR. As such, they should be addressed in the FEIR. All of the comments therefore must receive the same heightened, CEQA-level of review. SANDAG does the public a disservice by denying these comments a proper response under CEQA.  

II. The FEIR Fails to Take a Holistic Look at the Impacts of Its Plan and Improperly Partitions its Analysis into a Few Temporal Snapshots.

The FEIR effectively tiers its consideration of environmental impacts by separating its analysis into distinct multi-year periods 2020, 2035, and 2050. As a result, the FEIR’s initial misguided assumptions skews its subsequent overall analysis. This deficiency permeates the FEIR’s entire analysis. The FEIR’s consideration never receives full cumulative consideration of its impacts—one of the basic policies behind programmatic planning.

Contrary to SANDAG’s reliance and assertion that a programmatic EIR allows deference of virtual all detailed environmental review to connected future projects; just the opposite holds true. CEQA, in fact, requires that the a program EIR provide an in-depth analysis of a large-scale projects, forecasting the project’s effects “as specifically and comprehensively as possible.” SANDAG is obligated to examine the project’s impacts from a “big picture,” vantage point and therefore the program EIR must provide “more exhaustive consideration” of effects and alternatives for the entire span of the project.

CEQA additionally requires, that the significance of impacts be measured against a baseline of existing conditions, not future conditions (or as in this instance a trio of multi-year intervals). The fact that regional planning documents acknowledge that certain project may occur during one of the distinct future three-year segments is irrelevant to the analysis of whether the entire 4-decade Plan will have a significant or cumulatively significant impact.

Consequently, SANDAG uses the wrong baseline for measuring the Project’s impacts. CEQA case law holds that existing conditions, rather than some hypothetical future scenario, should be the basis for determining the significance of impacts. The primary principle set forth is that the use of a future scenario as a baseline should be avoided where the practical consequence of such an approach would be to artificially understated the true environmental consequences of a proposed project. Here, by using existing conditions plus expected conditions for each multi-year phase – 2020, 2035, and 2050 the EIR understates the effect the Plan overall will have on the region. The potential significant impacts expected from foreseeable projects should be analyzed thoroughly as a cumulative impact, and not built into three distinct baselines.

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18 See, CEQA Guidelines § 15088
19 14 Cal Code Regs § 15125 (a); see also, Woodward Park Homeowners Ass’n v. City of Fresno, 150 Cal. App. 4th 683, 707 (2007) (EIR must “compare what will happen if the project is built with what will happen if the site is left alone.”).
III. The FEIR’s Environmental Justice Is Not Supported by Substantial Evidence.

The FEIR’s environmental justice analysis approach, which relies on sensitivity receptors, is misguided. Sensitive receptors are people or institutions with people that are particularly susceptible to illness from environmental pollution, such as the elderly, the very young, athletes, and those persons who are already weakened by acute or chronic illness. Whereas, the Club appreciates the inclusion of new information on the issue in the FEIR, that analysis is flawed.

The conclusion the FEIR draws that low-income and minority communities will not be significantly impacted lacks substantial evidence and violates CEQA. For example, the FEIR fails to analyze how both transit and freeway development could disproportionately impact communities of color and low-income communities. With respect to the RTP/SCS’s DEIR, the California Attorney General Kamala Harris notes that “SANDAG has set too low a bar for determining whether the air quality impacts of the of its RTP/SCS are significant, and, further, has failed to analyze the impacts of projected increases in pollution on communities that are sensitive or already overburdened with pollution, in violation of CEQA.” SANDAG has not adequately addressed the Attorney General’s concerns; the Attorney General’s concerns remain apposite to the RTP/SCS’s FEIR.

IV. The FEIR’s Assumptions Vehicle Emissions Inventory Model Fails to take into Consideration Potentially Significant Emissions Sources.

The conformity analysis relies on the EMFAC 2007 vehicle emissions inventory model, yet there is no discussion of the model’s ability to address gross-polluting vehicles or other vehicles that operate outside of emissions requirements. Nor does the model address off-road vehicle emissions, despite substantial emissions contributions from these sources. Furthermore, the analysis claims that four federally-approved Transportation Control Measures (TCMs) “have been fully implemented,” nonetheless, there is no discussion of what levels of each of these four measures have been attained or how these TCMs, which were approved in the 1982 SIP, are outdated, and in need of further refinement.

In order for the FEIR to comply with CEQA, it must be backed by substantial evidence—evidence upon which the public and decision-makers can reasonably rely. The FEIR’s conformity simply analysis fails this test. The problems with the conformity analysis translate into failures of the FEIR in that the FEIR relies on the conformity analysis to conclude that the project will not conflict with applicable plans.

V. The FEIR Obfuscates its CEQA Obligations by Improperly Equating Statutory Conformity with CEQA-Mandated Impact Analysis.

The FEIR’s focus on statutory conformity overlooks the CEQA’s statutory mandate that

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22 FEIR Appendix B at B-13.
23 FEIR Appendix B at B-16.
the analysis consider the project’s effects beyond mere conformity. The Attorney General commented on the RTP/SCS’s DEIR:

The DEIR’s analysis of whether localized air pollution resulting from the RTP/SCS is significant under CEQA focuses exclusively on whether such conformity is achieved. There are significant problems with this limited approach, which substitutes a determination of whether certain federal laws are met for SANDAG’s obligation under CEQA to conduct a thorough analysis of the actual effects on the air and on public health that will result from the addition of many hundreds of miles of highway expansion and extensions that are in the RTP/SCS.24

This issue that the Attorney General highlighted has not been rectified in the FEIR.

a. The CAA-Emission Budgets Based on 2007 Numbers Create Misleading Baselines Which Do Not Produce NAAQS Compliance.

The FEIR relies on emissions budgets based on outdated emissions figures. These emissions budgets, which ostensibly indicate that projects emissions are within the budgeted emissions allocations, nonetheless do not demonstrate that the Project will not contribute to NAAQS exceedances in the San Diego Air Basin. The FEIR’s emissions budgets are based on 2007 figures. These budgets fail to paint a real-life picture of accurate emissions and have failed consistently to result in NAAQS compliance for the regions air basin. Ozone and particulate matter exceedance regularly occur in the San Diego Air Basin. While the plan’s projected emissions fall below the emissions budget thresholds, NAAQS exceedances continue. The emissions budgets provided simply are not meaningful compliance indicators.

VI. The Categorization of Managed Lanes as Transit Projects Obscures the True Impacts of the Plan, Undermines the Goals of SB 375, and Raises Significant Environmental Justice Issues, Which Are Not Addressed in the FEIR.

SANDAG’s main transit goals include lessening freeway congestion, encouraging compact land uses, and expanding service to employment centers.25 SANDAG relies nearly exclusively on expanding freeway capacity with the creation of general-purpose lanes coupled with Bus Rapid Transit (“BRT”), High Occupancy Vehicle (“HOV”) and High Occupancy Toll (“HOT”) lanes to obtain the target objective. HOT lanes, or high-occupancy vehicle lanes that allow solo drivers for a fee access to what would otherwise be High Occupancy Vehicle (“HOV”) or Bus Rapid Transit (“BRT”) lanes.

The SANDAG praises its current Plan as “maximizing transit funding” and that its “[t]ransit expenditures make up over half of the expenditures in the Plan.”26 SANDAG’s accolades are misplaced, the Plan has but, one transit exclusive lane and the predominate amount

26 FEIR, Appendix G, G-534.
of the 130 miles of the purported robust transit infrastructure is tethered to freeway expansion, namely HOT lanes. San Diego recently underwent construction and operation of a HOT lane on Interstate I-15, Samuel Johnson; of SANDAG’s Fastrak program in a recent article stated “if we [SANDAG] can get solo drivers to use the express lanes ... we [SANDAG] can better move people through the corridor.”27 To this end SANDAG has, for a limited time offered an incentive exclusively for SOLO drivers, a ten-dollar gasoline card for the use of the I-15 express lane. The impact of inducing solo driver to HOT lanes that are couched as transit development are not accounted for the true significant impact to air quality, greenhouse gas emission and environmental justice will remain unknown, unaccounted for and unmitigated.

a. The FEIR’s Lumps HOV and HOT Lanes Together Under the Umbrella of “Managed Lanes” and Consistently Fails to Analyze the Potentially Dis disparate Environmental Justice Impacts of HOV and HOT Lanes.

The FEIR misleadingly categorizes managed lanes as “transit projects” when these project in fact represent little more than highway widening projects. Further, by categorizing HOV and HOT lanes together under the umbrella of “managed lanes,” the FEIR fails to take into account their potentially disparate impacts to low-income and communities of color. The available empirical data on HOT lanes notes that, “[e]quity concerns are unavoidable in HOT lane projects.”28 Another study notes that HOT lanes have been deemed “Lexus Lanes” by some.29

The FEIR lacks any evidence whatsoever, let alone substantial evidence, that the reliance of HOT lanes will not result in significant impacts to air quality which can increase the disparate impacts to low-income and communities of color. Without proper analysis the FEIR is unable to satisfy CEQA’s informational mandate and therefore, until such time that SANDAG provides the requisite analysis the fundamentally flawed document is unfit for certification.

VII. The Fast Plan Alternative was Inappropriately Dismissed as a Feasible Alternative.

As expressed in the Club’s previous letter, the alternatives analysis lies at “[t]he core of an EIR.”30 Every EIR must describe a range of alternatives to the proposed project and its location that would feasibly attain the project’s basic objectives while avoiding or substantially lessening the project’s significant impacts.31 A proper analysis of alternatives is essential for the SANDAG to comply with CEQA’s mandate that significant environmental damage be avoided or substantially lessened where feasible.32 As stated in Laurel Heights, “[w]ithout meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles

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30 Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.
31 CEQA 21100(b)(4); CEQA Guidelines 15126(d).
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.33

The FEIR summarily rejects the Fast Plan alternative, claiming that the 2050 RTP/SCS would achieve a similar level of network connectivity and high-speed service. The Fast Plan alternative would significantly reduce the RTP/SCS’s impacts, but the FEIR summarily rejects it without providing a reasonable rationale for its election to do so.

Conclusion

For all the foregoing reasons, the RTP/SCS’s FEIR fails to live up to CEQA’s mandates in a number of areas. The FEIR fails to provide an adequate description of the plan, fails to present a thorough analysis of its actual impacts, fails to identify appropriate levels of significance, fails to consider potentially significant impacts, and fails to include concrete mitigation measures for significant impacts. The Sierra Club respectfully request that SANDAG refrain from approving the 2050 RTP/SCS until it has prepared an EIR with conclusions supported by substantial evidence which fully complies with CEQA’s mandates. The Sierra Club hopes that SANDAG will take this opportunity to improve its plan and adopt an approach that diverts from its current fossil-fuel dependency by accommodating a full suite of emission-reducing alternatives.

Respectfully Submitted,

Pamela N. Epstein, Esq., LL.M
Staff Attorney & Legal Program Manager
Sierra Club, San Diego Chapter
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8304 Clairemont Mesa Blvd., Ste 101
San Diego, CA 92111

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 15,000 members. The National Sierra Club has over 1.4 members in 65 Chapters in all 50 states, and Puerto Rico.

33 Laurel Heights Improvement Association v. Regents of University of California, 47 Cal.3d 376, 404 (1988).
October 27, 2011

Chair Jerome Stocks and
Members of the Board
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Re: 2050 Regional Transportation Plan/Sustainable Communities Strategy and Environmental Impact Report

Dear Chair Stocks and Members of the Board:

We submit this letter on behalf of the Cleveland National Forest Foundation ("CNFF"), Save Our Forest and Ranchlands ("SOFAR"), the Center for Biological Diversity, and Sierra Club to provide comments on the proposed 2050 regional transportation plan/sustainable communities strategy ("RTP/SCS," "Plan" or "Project") and the accompanying environmental impact report ("EIR").

The particular purpose of this letter is to provide comments on the Final EIR ("FEIR") for the proposed Project and to inform SANDAG that the document fails to comply with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. ("Guidelines"). For the reasons set forth below, we request that the Board delay further consideration of this Project until such time as a legally adequate EIR is prepared that fully complies with CEQA.

I. INTRODUCTION

This firm submitted extensive comments to SANDAG on the Draft EIR ("DEIR") for the Project, identifying scores of legal inadequacies in the DEIR. These comments expressed our grave concern that the RTP/SCS's highway-oriented approach to transportation would facilitate sprawling growth throughout the region; would undermine any attempt to ensure smart, city-centered growth; and would set the region on
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a course that is inconsistent with the State’s climate objectives. These concerns were echoed by a wide range of commenters with diverging interests, including the California Office of the Attorney General, the California Coastal Commission, the California Department of Fish & Game, the Office of Planning and Research, local jurisdictions, and numerous environmental and community organizations.

The FEIR’s response to these concerns is, lamentably, denial. Rather than revise the RTP/SCS to provide a truly transit-focused plan, or analyze the actual environmental costs of a “business-as-usual” transportation plan, the FEIR merely seeks to defend the erroneous assertions and conclusions of the prior document.1 The vast majority of the environmental community’s concerns about the impacts to the region caused by SANDAG’s auto-centric planning approach are rejected out of hand.

SANDAG is now further hampering the planning process—and frustrating the purposes underlying CEQA review—by providing the public only ten days to review an FEIR that comprises about 1,200 pages. The intense controversy surrounding this Project, exemplified by the 1,500 individuals and organizations commenting on the Project and its EIR, warrants sufficient time to review the agency’s responses to comments. Moreover, the FEIR includes numerous revisions to the Project itself and substantive new analysis, but the agency is not allowing sufficient time to allow for members of the public to review, let alone synthesize, the contents of this new information.2 This truncated review period makes meaningful review by the public exceedingly difficult, thereby undermining CEQA’s informational and public participation objectives.

In short, the FEIR fails to remedy the deficiencies of the EIR. It also fails to respond adequately to our comments on the DEIR. As a result, we conclude, once again, that SANDAG would violate CEQA were it to certify this fatally flawed EIR.

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1 The DEIR and the FEIR are sometimes referred to collectively as the “EIR.”

2 The RTP/SCS has been revised substantially since publication of the DEIR including numerous changes to transit, highways and arterials in the proposed transportation network. See DEIR at G-32 – G-35 and Table 1. The FEIR also includes substantive new analysis of the Project’s environmental impacts including an evaluation—albeit entirely incomplete—of the Project’s potential to expose sensitive receptors to elevated pollution levels. Id. at 4.3-41.

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II. THE FEIR Does Not Remedy the Deficiencies of the DEIR or Adequately Respond to Comments.

A. The FEIR’s Justifications for Failing to Provide a More Detailed Analysis of Its Project Are Unavailing.

Our firm’s letter, along with numerous others, commented that the description of the RTP/SCS and the EIR’s impact analyses lack sufficient detail and information to enable the public to assess the Project’s environmental impacts. Among the EIR’s most notable deficiencies is its lack of an adequate account of the Project’s transportation components, especially transit, as well as the Project’s plan for ensuring that its land use component will develop in the ambitious 80 percent infill development pattern indicated. SANDAG offers two primary responses to this line of comments, both of which must fail.

First, as with the remainder of the EIR, SANDAG attempts to excuse its lack of Project detail by claiming that the EIR is merely a “Program EIR” that may be extremely general in nature. The FEIR suggests that no more detailed environmental review is necessary at this time because more specific analysis will be conducted in connection with future, project-level environmental review. See, e.g., FEIR Master Responses 1, 16; Responses to Comments R-17, R-18, R-23 at G-527, G-528, G-531.\(^3\)

\(^3\) This response to our repeated requests for more detailed analysis is as pervasive as it is wrong. For example, in response to our request that the DEIR actually describe the RTP’s proposed highway and arterial projects, the FEIR declares that “information included in the project description and [sic] was sufficient to conduct the EIR’s environmental impact analysis using accepted methodologies appropriate for the Program EIR’s level of detail.” Response R-17 at G-527; see also Response R-13 at G-526 which fails to provide specific responses to our questions requesting an accounting of the number, location, and phasing of transit projects proposed for the Urban Area Transit Study geographical area. The FEIR also makes no attempt to identify the specific bottleneck/auxiliary projects proposed by the RTP, stating that these projects will be identified in the RTIP [Regional Transportation Improvement Plan]. Response R-18 at G-527. (Note that the RTIP does not appear to be incorporated by reference into the EIR as required by CEQA. See Guidelines §15150). The EIR also inappropriately defers mitigation measures, suggesting that impacts and mitigations will be assessed at the project level. See, e.g., Measure AQ-B, FEIR at 4.3-63 Measure AQ-B.
The “programmatic” nature of this EIR, however, is no excuse for its lack of detailed analysis. The EIR grossly misconstrues both the meaning and requirements of a “program” EIR by suggesting that the geographic scope and complexity of the 2050 RTP/SCS played an important role in determining the appropriate level of detail to include in the EIR, as did the highly diverse nature of the Project itself. FEIR Master Response 1 at G-3. This approach is flawed, at the outset, because CEQA requires that a program EIR provide an in-depth analysis of a large-scale project, looking at effects “as specifically and comprehensively as possible.” Guidelines § 15168(a), (c)(5). Indeed, because it is designed to look at the “big picture,” a program EIR must provide “more exhaustive consideration” of effects and alternatives than can be accommodated by an EIR for an individual action, and must consider “cumulative impacts that might be slighted by a case-by-case analysis.” Guidelines § 15168(b)(1)-(2).

Furthermore, whether a lead agency prepares a “program” EIR or a “project-specific” EIR under CEQA, the requirements for an adequate EIR remain the same. Guidelines § 15160. “Designating an EIR as a program EIR also does not by itself decrease the level of analysis otherwise required in the EIR.” Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency, 82 Cal.App.4th 511 (2000). Even a program-level EIR must contain “extensive detailed evaluations” of a plan’s effects on the existing environment. See Envtl Planning and Info. Council v. County of E Dorado, 131 Cal.App.3d 350, 358 (1982). See also Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692, 723-24(1990) (where the record before an agency contains information relevant to environmental impacts, it is both reasonable and practical to include that information in an EIR).

The FEIR’s reliance on future, project-level environmental review is also misplaced. Again, CEQA’s policy favoring early identification of environmental impacts does not allow agencies to defer analysis of a plan’s impacts to some future EIR for specific projects contemplated by that plan. See Bozung v. Local Agency Formation Comm., 13 Cal.3d 263, 282-84 (1975); Christward Ministry v. Superior Court, 184 Cal.App.3d 180, 194 (1986); City of Redlands v. County of San Bernardino, 96 Cal.App.4th 398, 409 (2002). As Guidelines section 15152(b) explicitly warns, “[t]iering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.”

Moreover, there is no guarantee that such future, detailed environmental review will happen. Several CEQA provisions provide that neither SANDAG nor other local agencies will have to conduct further environmental review for specific future
projects that are consistent with the RTP or SCS. See, e.g., Pub. Res. Code § 21155.1 ("transit priority projects" that are consistent with an SCS and meet certain other criteria are exempt from CEQA review entirely); Guidelines § 15183 (streamlined environmental review for projects consistent with general or community plans for which EIRs have already been prepared). Thus, the time to analyze the potential environmental impacts caused by projects contemplated by the proposed RTP/SCS is now. In order to do so, SANDAG and the public must have a full understanding of the various components contemplated by and included within the 2050 RTP/SCS.

Second, SANDAG attempts to dismiss comments regarding the description of the 2050 RTP/SCS as comments unrelated to the environmental review process. This effort to bifurcate the development of the 2050 RTP/SCS from the CEQA process is fundamentally flawed. The 2050 RTP/SCS is the "project" under CEQA review. As noted in our prior comment letter, "[a]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, 27 Cal. App. 4th 713, 730 (1994). Furthermore, "[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." Id. at 730 (citation omitted). Thus, an inaccurate or incomplete project description renders the analysis of significant environmental impacts inherently unreliable. Therefore, the CEQA process is necessarily impacted by any inadequacies in the development of the 2050 RTP/SCS. As a result, the thousands of comments submitted on the RTP/SCS must be considered as part of the administrative record for the CEQA process, and are hereby incorporated by reference.

B. The EIR Does Not Adequately Analyze the True, Full Scope of the 2050 RTP/SCS.

In response to comments that the EIR does not set forth any details about the manner in which the 2050 RTP/SCS will in fact deliver its promise that "[n]ew development will be more compact, and more accessible to public transit" (RTP/SCS at 3-6), the FEIR states essentially that SANDAG is entitled to make assumptions regarding its Plan. See, e.g., FEIR at G-525. SANDAG misses the point. CEQA requires that an EIR evaluate the environmental impacts of an agency's "project." CEQA defines a "project" as "the whole of an action, which has a potential for resulting in either a direct physical change" or "a reasonably foreseeable indirect change in the environment." Guidelines § 15378(a) (emphasis added); see also Guidelines § 15378(c) (term "project" means the whole of the "activity which is being approved"). Thus, CEQA requires that an agency take an expansive view of all project components as it conducts the
environmental review for that project. See McQueen v. Bd. of Directors, 202 Cal.App.3d 1136, 1143 (1988). Critically, environmental review of the development allowed by a large-scale planning enactment must take place regardless whether that development is amorphous and uncertain to occur. See Bozung, 13 Cal.3d at 279, 282; Christward Ministry, 184 Cal.App.3d at 194-95.

The “project” under review here is the 2050 RTP/SCS, the purpose of which is to lead the region into more sustainable transportation and land use patterns in order to reduce environmental impacts, including GHG emissions. To comply with CEQA’s informational purpose, the EIR may not just assume that the Plan provides an optimistic transit-oriented future. Rather, the EIR must “demonstrate to an apprehensive citizenry” that the Plan in fact includes project components that will result in such a future, or provide a complete analysis of the ultimate development that could occur under the agency’s approval. Laurel Heights Improvement Assn. v. Regents of the University of California, 47 Cal. 3d 376, 392 (1988) (“Laurel Heights I”); San Joaquin Raptor Rescue Center v. County of Merced, 149 Cal.App.4th 645, 655 (2007).

In its response to comments, SANDAG argues repeatedly that it has no authority over land use. See, e.g., FEIR at 4.8-14 (explaining that since SANDAG does not implement land use policy, decisions regarding how and when to implement land use strategies that will result in reduced GHG emissions outlined in the SCS will ultimately come from the local-agency level) and Master Response 4(at G-12) and Response R-29 (at G-539)(asserting that “SANDAG has no authority to adopt land use plans or approve land use projects that will implement the SCS.”). As such, SANDAG attempts to eschew any responsibility for its Project, and avoid an adequate analysis of its impacts. CEQA does not countenance such avoidance.

SANDAG is the regional transportation agency that has been given authority to develop a precedent-setting RTP/SCS. As explained further below, infra, SANDAG has the ability to adopt binding mitigation measures on local agencies to help ensure that the land use plan assumed by the RTP/SCS gets implemented. Furthermore, SANDAG is the agency that can and should plan for and fund transit in the immediate future, as suggested, for example, by the 50-10 Plan. Such front-loading of transit projects would ensure a transit-oriented future, as promised by SANDAG.

The 2050 RTP/SCS, however, does just the opposite. While claiming that its Project will result in 80 percent infill development (e.g., RTP/SCS at 3-6) and that “[m]ore than 75 percent of the investments in the plan support public transit and carpool” (FEIR at G-527), the 2050 RTP/SCS in fact extensively relies on increases in highway
capacity and so-called “managed lanes” to meet the region’s mobility needs—and especially highway expansion projects in the County’s remote areas. Such a Plan will not result in land use patterns where 80 percent of jobs and homes are concentrated within the Urban Area Transit Study area. High projects, and especially projects that increase highway capacity in the region’s remote locations, will not lead to compact land uses in the region’s urbanized locations (i.e., the western third of the County).

SANDAG provides no concrete evidence to support its assumptions to the contrary. Thus, the case is analogous to San Joaquin Raptor Rescue Center, 149 Cal.App.4th at 655, where the court found the project description for a mine project was unstable and misleading because it promised, on the one hand, that the project did not anticipate any increase in mine production, but, on the other hand, allowed for such an increase to occur.

CEQA does not require that SANDAG’s Project result in any particular outcome. It does require, however, that the EIR analyze the full consequences of the Project. Thus, if SANDAG cannot support its claim that the 2050 RTP/SCS will in fact result in the in-fill and transit-oriented development that it promises, the agency must

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4 The EIR acknowledges that between 2035 and 2050 growth is expected in the remote locations in the County. However, by 2050, spaced rural residential development would have expanded beyond areas along existing transportation corridors and established rural communities and into areas with very minimal development at present. FEIR at 4.3-54. Large pockets of land currently used for agricultural purposes would be developed with spaced rural residential uses. Id.

5 Indeed, instead of leading the region in a sustainable direction, SANDAG admits that its Plan would do little more than maintain the status quo or prevent the region from backsliding. See California Environmental Protection Agency and California Air Resources Board, Informational Report on the San Diego Association of Governments Draft SB 375 Sustainable Communities Strategy (“CARB Report”) at 34,35, attached as Exhibit 11, stating “that housing within a half mile of a transit station increases from 79 to 80 percent between 2008 and 2020. Employment within a half mile of a transit station increases from 86 to 89 percent between 2008 and 2020, and slightly decreases from 89 to 88 percent between 2020 and 2035. SANDAG staff indicated that, in the absence of the draft SCS policies, the percentages of employment and housing within a half mile of a transit station would significantly decrease from 86 to 83 percent and from 79 to 76 percent, respectively, between 2008 and 2035.”
analyze the environmental consequences of the sprawling development that could ultimately result under its Plan, even if that development never materializes.

Here, the EIR fails to analyze not only the full environmental consequences of the type and location of growth that is likely to result from implementation of the highway-focused Plan, but also the total amount of development that could result from its Plan. The EIR itself acknowledges that the RTP/SCS could allow greater residential and nonresidential development levels in 2050 than the EIR analyzes. Yet, the document fails to adequately analyze the environmental impacts resulting from full buildout. Instead, it relegates a summary of these potential impacts to a chapter near the end of the EIR. This chapter, entitled Maximum Theoretical Buildout Scenario, makes clear that the jurisdictional land use plans associated with the 2050 RTP/SCS land use forecast provide the capacity for residential units and nonresidential building square feet to allow buildout. The EIR then identifies the amount of housing and jobs that would be achieved under buildout. FEIR at 7-2. Specifically, while the main body of the EIR only analyzes a 34 percent increase in housing units by 2050, the RTP/SCS would actually allow a 38 percent increase in housing units during the same period. Id. Similarly, the EIR analyzes only a 33 percent increase in jobs by 2050, yet the RTP/SCS actually could result in a 42 percent increase, if full development of the Plan were to materialize. Id. These differences are not inconsequential, especially in light of the fact that much of the unanalyzed growth could occur in rural or agricultural areas, and that even small increases in development could result in significant cumulative impacts.

Despite acknowledging the full extent of development actually allowed under the RTP/SCS, the EIR provides only the most cursory analysis of the environmental impacts that would inevitably flow from such development. In fact, it makes no attempt to quantify or in any way estimate the impacts that would occur from maximum build-out, but instead merely labels many of the impacts “significant and unavoidable” without the requisite analysis. For example, with regard to air quality, the EIR includes vague statements such as “this increase in development could also create air emissions that could substantially degrade ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations.” FEIR, 7-3. Nor does the EIR provide any meaningful analysis of the Project’s impact relating to climate change. The EIR merely provides the following unhelpful statement:

Increased development and transportation impacts under the theoretical buildout scenario would create an overall increase in GHG emissions, although per capacity GHG emissions may remain the same if the type and location of development continue to be
compact, mixed use, and near transit options as identified in the 2050 RTP/SCS. Therefore the theoretical buildout scenario would likely still achieve SB 375's per capacity emission reduction targets set by CARB for the San Diego region. Id. at 7-5.

Because the RTP/SCS will allow these extensive development levels, the EIR for the RTP/SCS should have provided a full analysis of the potential environmental impacts resulting from it. As the Court of Appeal held in Christward Ministry, 184 Cal.App.3d at 194:

Even if a general plan amendment is treated merely as a "first phase" with later developments having separate approvals and environmental assessments, it is apparent that an evaluation of a "first phase-general plan amendment" must necessarily include a consideration of the larger project, i.e., the future development permitted by the amendment. Only then can the ultimate effect of the amendment upon the physical environment be addressed.

Id. (emphasis added); see also City of Redlands, 96 Cal.App.4th at 409 (quoting same). Thus, in its environmental impacts analysis, the EIR must use population and growth assumptions that reflect the substantial development permitted by the jurisdictions' general plans, not SANDAG's projections, which underestimate the new growth allowed by these general plans.

The Placer County Superior Court rejected an agency's similar attempt to analyze a reduced version of its project based on various growth "assumptions." See Sierra Watch v. Placer County, Case No. SCV 16652 (Decision Granting Writ of Mandamus) (May 3, 2005), attached hereto as Exhibit 1. In that case, the petitioners challenged the environmental review conducted for a community plan that was to govern development in the Martis Valley, just north of the Tahoe Basin. Like the EIR for this project, the EIR prepared for the Martis Valley Community Plan analyzed the impacts of developing a smaller number of residential units and commercial space than actually permitted by the community plan. So, while the community plan allowed 19,000 residential units and up to 5 million square feet of commercial space, the EIR only evaluated the project based on estimates of approximately 9,000 residential units and 1.1 million square feet of commercial space. Id. at 3. The County attempted to support these reduced numbers by pointing to a study suggesting that, on average, only 80% of permitted development was likely to actually occur. Id. at 7.
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The court found this analysis inadequate, holding “the time to study the likely [c] effects of specific and cumulative impacts [caused by the community plan] is at the time that the potential for development is known, whether or not that development actually occurs.” *Id.* at 13. The court then described the result of the EIR’s failure to analyze full build-out:

Petitioners are correct in their assertion that the EIR failed to study the full scope of *permissible development and construction* under the [community plan]. This failure resulted in artificially limited studies of environmental impacts . . . Flowing from this inadequacy are the mitigation measures proposed in the [community plan] which naturally fail to study and address the true nature and scope of the environmental consequences of the plan as adopted. Because of these combined failures, the Board of Supervisors was not provided with the real and potential magnitude of the environmental impacts of the proposed Community Plan. Accordingly, the County has not proceeded in a manner required by law . . . . *Id.* at 15 (emphasis added).

SANDAG cannot avoid informing the public of the potential environmental consequences of the RTP/SCS by asserting that the level of growth contemplated by the jurisdictions’ general plans is unlikely to occur.

C. The EIR Ignores the RTP/SCS’s Inconsistency with State Climate Objectives.

The FEIR’s claim that it may ignore the long-term emission reduction targets set forth in Executive Order S-3-05 is fundamentally flawed. Indeed, the FEIR’s discussion of the legal effect of an executive order is irrelevant for purposes of CEQA review. Under CEQA, a determination of the significance of an environment impact requires “careful judgment . . . based to the extent possible on scientific and factual data.” Guidelines § 15064(b). The significance determination thus reflects CEQA’s fundamental concern with a project’s effects on the physical environment. The emission reduction targets embodied in both AB 32 and Executive Order S-3-05 inform a determination of significance thresholds to the extent they reflect scientific data regarding the level of emissions reductions needed to minimize the impacts of climate change. It is irrelevant whether they are legally binding in other contexts. *Protect the Historic Amador Waterways v. Amador Water Agency*, 116 Cal. App. 4th 1099, 1109 (2004) (regulatory standards may serve as proxies for significance to the extent that they accurately reflect the level at which an impact can be said to be less than significant); see
also California Attorney General, *Frequently Asked Questions About Climate Change and CEQA*, attached as Exhibit 2.

As recognized by the California Air Resources Board’s (“CARB”) Draft CEQA Thresholds, the emission reduction targets set by AB 32 and Executive Order S-3-05 are consistent with a trajectory that aims to stabilize atmospheric concentrations of greenhouse gases at approximately 450 ppm, a level that climatologists estimate would provide a 50-50 chance of limiting global average temperature increases to 2°C above pre-industrial levels. *See CARB, Recommended Approaches for Setting Interim Significance Thresholds for GHGs under CEQA* (Oct. 2008), attached as Exhibit 3. Indeed, more recent scientific analysis indicates that deeper emissions reductions than prescribed in Executive Order S-3-05 are needed to avoid catastrophic climate impacts. Based on the alarming and unpredicted rate of loss of Arctic sea ice and other recent climate change observations, leading scientists have now concluded that “humanity must aim for an even lower level of GHGs.” Hansen, J. et al., *Target Atmospheric CO2: Where Should Humanity Aim?,* 2 Open Atmospheric Science J. 217 (2008). Therefore, the emission reduction pathways set by AB 32 and Executive Order S-3-05 would appear to represent bare minimum reductions and are likely insufficient to minimize the risk of severe impacts to California.

The scientific and factual data underlying both AB 32 and Executive Order S-3-05 thus clarify that AB 32’s objective of reducing emissions to 1990 emission levels by 2020 is only the first step toward climate stabilization. *See also CARB Scoping Plan* at 118, attached as Exhibit 5. AB 32’s reductions alone, in the absence of further reductions by 2050 that meet or exceed the requirements of Executive Order S-3-05, are not consistent with a pathway that avoids the worst physical impacts of climate change. Therefore, as the SCS/RTP contemplates physical changes to the environment that will endure to 2050 and beyond, there is no legitimate basis under CEQA for the EIR’s refusal to analyze the Project’s consistency with 2050 emission reduction targets.

The FEIR also erroneously claims that it need not evaluate the significance of the RTP/SCS based on consistency with California’s long-term emission reduction objectives because “impacts would be significant and unavoidable using either a net increase threshold … or an [Executive Order] based threshold.” FEIR, Response to Comments at G-7. Under CEQA, “[w]hat is needed is some information about how adverse the adverse impact will be.” *Santiago County Water Dist. v. County of Orange*, 118 Cal. App. 3d 818, 831 (1981). By refusing to disclose and acknowledge the fundamental inconsistencies of the RTP/SCS with the long-term emission reductions necessary to avoid catastrophic impacts, the EIR precludes informed decision making.
The EIR’s failure to analyze the Project in relation to 2050 emission reduction objectives obscures the SCS/RTP’s utter failure to seriously address its climate impacts. While the Project may reduce per capita emissions in the near-term through a series of short-lived fixes, per capita emissions increase again toward 2050, when climate science—as reflected in Executive Order S-3-05 and more recent published scientific work—unequivocally informs us that emissions must significantly decline. The failure of the SCS/RTP to achieve continued reductions in emissions indicates that the Project fails to set forth the meaningful changes to land-use and transportation investments required to avoid climate impacts over the long term.

The extent of future warming depends on whether and how rapidly California and the rest of the world reduce GHG emissions. As noted by the California Climate Change Center, a collaboration of researchers assembled by the California Energy Commission, “[b]ecause most global warming emissions remain in the atmosphere for decades or centuries, the choices we make today greatly influence the climate our children and grandchildren inherit.” California Climate Change Center, Our Changing Climate, Assessing the Risks to California (2006) at 2, attached as Exhibit 2. SANDAG’s failure to disclose the RTP/SCS’s fundamental inconsistency with California’s long-term emissions reduction goals, as well as its failure to describe an alternative scenario that could meet these objectives, both violates CEQA and profoundly disserves present and future generations of Californians.

D. The EIR’s Analysis of Air Quality Impacts is Legally Inadequate.

1. The EIR Fails to Evaluate the RTP/SCS’s Potential to Expose Sensitive Receptors to Substantial Pollutant Concentrations.

   a) The EIR Fails to Describe the Project’s Air Quality Setting.

An EIR’s description of a project’s environmental setting plays a critical part in all of the subsequent parts of the EIR because it provides “the baseline physical conditions by which a lead agency determines whether an impact is significant.” Guidelines § 15125(a). “Knowledge of the regional setting is critical to the assessment of environmental impacts.” Guidelines §15125 (c). Although the FEIR asserts that the EIR’s environmental setting section discussion meets CEQA’s requirements (at response V-6), we disagree. The document’s discussion of the region’s environmental setting is entirely cursory and uninformative.
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According to the American Lung Association's annual air-quality report, San Diego County has the distinction of having the 7th and 15th highest ozone days and particulate pollution days out of the nation's 277 metropolitan areas. See American Lung Association, State of the Air, attached as Exhibit 7. The FEIR nevertheless attempts to downplay the region’s poor air quality by suggesting that air quality has improved significantly over the last 25 years. See FEIR Response V-3 at G-656. The region, like the entire nation, has made great strides in improving air quality over the last few decades. Pollution levels in the 1970s were abysmal, though; in 1977, residents of the San Diego region were forced to endure air quality that exceeded health based standards almost one-half of the year. Id. Despite the improvements, the United States Environmental Protection Agency (“USEPA”), the Office of the Attorney General, and the American Lung Association aptly acknowledge that people are still suffering pollution levels that are simply too often dangerous to breathe. See, e.g., Exhibit 7 (American Lung Association).

As many of the RTP/SCS’s highway projects will traverse communities that are already burdened by polluted air, one would have expected the EIR actually to describe these sensitive receptors and identify their location. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. The South Coast Air Quality Management District (“SCAQMD”), for example, includes in its list of sensitive receptors, residences, schools, playgrounds, childcare centers, convalescent homes, retirement homes, rehabilitation centers, and athletic facilities. Sensitive population groups include children, the elderly, and the acutely and chronically ill, especially those with cardio-respiratory diseases. Residential areas are also considered to be sensitive to air pollution because residents tend to be home for extended periods of time, resulting in sustained exposure to any pollutant present. While the FEIR now includes maps showing the location of proposed roadway projects that would be expected to have a medium or high air quality index (Figures 4.3-2 and 4.3-3), these maps do not provide any information about sensitive population groups.

Nor did the DEIR include any discussion about affected low-income and minority communities, even though they are already disproportionately burdened by air pollution. Studies conducted by CARB and others confirm that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. See CARB Air Quality and Land Use Handbook, attached to this firm’s comment letter on the RTP/SCS DEIR. Specifically, these studies found reduced lung function and increased asthma in children within 1,000 feet of heavy traffic. Id. In addition to the respiratory health effects,

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proximity to freeways increases potential cancer risk. *Id.* The health impacts resulting from transportation systems are typically not distributed evenly across all populations, with lower income populations and communities of color often facing worse outcomes for a variety of reasons. *See Human Impact Partners, Elevating Health & Equity into the Sustainable Communities Strategy (SCS) Process SCS Health & Equity Performance Metrics* (August 2011), attached as Exhibit 8.

Despite the certain increase in air pollutants in the immediate area of the RTP/SCS’s planned highway projects, the EIR entirely fails to quantitatively, or even qualitatively, identify the number and type of sensitive receptors that would be affected by the proposed Project. Such information must be provided so that the public and decision-makers can understand who will be at particular risk due to elevated pollutant concentrations resulting from the Plan’s transportation projects.

Moreover, the EIR fails to adequately identify or describe local air pollution levels despite the availability of this information. For example, the San Diego Air Pollution Control District has been sampling for toxic air contaminants (“TACs”) since the mid-1980s at several locations in the region. DEIR at 4.3-7. The Air District collects data at the Escondido, Otay Mesa, downtown San Diego, and Chula Vista monitoring stations. *Id.* Despite the availability of this data, the EIR does not disclose this information and thus has no baseline for use in evaluating the Project’s air quality impacts.

**(b) The EIR Fails to Conduct a Health Risk Analysis.**

Although the transportation projects that would be implemented by the RTP/SCS have the potential to result in a substantial increase in toxic air contaminants (“TAC”) and mobile source air toxics (“MSAT”) emissions, and therefore may pose a significant health risk to sensitive receptors, the DEIR failed to provide an analysis of these impacts. This omission is particularly egregious inasmuch as the DEIR acknowledged that compounds, including diesel PM, benzene, and 1, 3- butadiene, are generated by on-road traffic and can result in elevated cancer risks and chronic non-cancer risks. DEIR at 3.4-7.

The DEIR provides two excuses for its failure to conduct this analysis. First, the EIR asserts that there are no established criteria for determining when MSAT emissions should be considered a significant impact. DEIR at 4.3-8. Second, the EIR suggests the level of exposure can only be determined through project-level analysis. *Id.* at 4.3-37.
The EIR is wrong on both counts and, in fact, contradicts itself regarding the significance threshold for MSAT emissions. First, the DEIR acknowledges that TACs/MSATs may pose a threat to public health even at low concentrations due to their high toxicity, warning that there are no safe exposure levels for these pollutants. *Id.* at 4.3-36 (emphasis added). The DEIR also suggests a threshold of significance when it states that the Project’s “impact would be considered significant if projected emissions of MSATs in 2020, 2035 and 2050 are greater than baseline emission levels.” *Id.* at 4.3-8. Thus, the EIR should and could have used a “no net increase” as its significance threshold.

Second, as discussed above, the use of a program EIR does not excuse deferral of environmental review of the RTP/SCS’s significant environmental impacts. Guidelines section 15152(b) explicitly admonishes, “[t]iering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.” By suggesting that SANDAG cannot conduct this analysis, the EIR authors sidestep the serious health effects resulting from the Project’s massive increase in pollution.

Apparently recognizing this fatal omission, the FEIR now includes an “expanded discussion” of the health risks associated with diesel particulates and a new “localized air quality index analysis.” See Response V-7 at G-660 and FEIR at 4.3-44. Yet, the EIR still does not evaluate the actual and specific health risk that would accompany the RTP/SCS’s projects. Instead, the new text under the heading “local air quality” summarily recites the health risks that generally accompany TAC and MSAT exposure. FEIR at 4.3-7. The new impact “analysis” fares no better. The EIR simply includes a few tables ranking the percentage of highways that would have low, medium or high exposure to pollutants and a couple of maps identifying those highways that would be expected to result in the most potential harm based on the highway’s projected level of traffic. See FEIR at 4.3-45, 48 and 49. Then, it includes the obvious assertion that as traffic volumes increase, communities would be exposed to higher localized concentrations of toxics. *Id.* That, however, is as far as the “analysis” goes before it culminates in the following unhelpful summary:

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6 This language was inexplicably deleted from the FEIR. See FEIR at 4.3-8.
While this analysis generally suggests that both LIM [low income minority] and non-ILM communities will potentially be exposed to increases in localized CO and PM concentrations and concomitant health risks over the horizon years of the plan, health risks to specific communities from specific projects can be determined only through project-specific analysis. Project-specific hot spot analysis and HRAs will be conducted at the project level to identify project hotspots and specific health risks, and mitigation measures to reduce health risks that would be suitable for each individual project. It should also be noted that based on the analysis, the potential for increased impacts to both LIM and non-LIM communities over time is similar and there is not a disparate impact on LIM communities when compared to non-LIM communities. *Id.* at 4.3-37.

This generic discussion does not come close to meeting CEQA’s requirements for a detailed impact analysis. A legally adequate EIR “must contain sufficient detail to help ensure the integrity of the process of decision making by precluding stubborn problems or serious criticism from being swept under the rug.” *Kings County Farm Bureau*, 221 Cal. App. 3d at 733; Guidelines § 15151. See, e.g., *Berkeley Keep Jets Over the Bay Committee v. Bd. of Port Commissioners*, 91 Cal.App.4th 1344, 1349-50 (2001) (requiring health impacts analysis for Port of Oakland’s airport expansion).

Indeed, Table 4.3-8, which identifies the percentage of freeway segments that rank high in the air quality index, provides no explanation of how these values were even arrived at. For example, while the Table apparently ranks those transportation facilities that could potentially expose LIM and non-LIM communities to localized concentrations of pollutants based on traffic volumes, LOS decreases and truck traffic volumes (at 4.3-47), the EIR never identifies the specific highway projects on which the Table’s ranking was based. Nor does the EIR inform the reader which transportation facilities are expected to have the highest truck volumes. This last piece of information is critical insomuch as trucks are the major emitters of diesel particulate emissions and therefore would present the greatest potential health risk.

Moreover, although the FEIR asserts that the actual exposure levels cannot be evaluated until the project-specific level (this issue is addressed below), the document nonetheless boldly proclaims that “the potential for increased impacts to both LIM and non-LIM communities over time is similar and there is not a disparate impact on LIM communities when compared to non-LIM communities.” *Id.* at 4.3-47. Incredibly, the
EIR provides no evidence to support this startling conclusion.\(^7\) How can the EIR claim on the one hand that it is not possible to evaluate the health risks to sensitive receptors yet simultaneously conclude that all receptors would be equally impacted? Critically, there is no doubt that low income and minority communities will face far more severe health effects as a result of the RTP/SCS's highway projects because it is exactly these residents that live adjacent to highways and freeways. The RTP's highway projects will certainly have a disproportionate effect on LIM communities. The problem is that the EIR declines to tell us what that effect will be.

SANDAG can and must do better. If agencies can study the health effects of projects at the project-specific level as the EIR asserts (4-347), SANDAG can certainly examine the effects at the plan level. It knows the locations of the RTP's highway projects and that these projects will increase vehicle miles. Clearly, based on Table 4.3-8, it also knows how much traffic will be travelling on these facilities and the number of automobiles, light-duty and heavy-duty trucks. Using EMFAC, SANDAG could then calculate emission rates from these vehicle classes.\(^8\) Once the emission rates are

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\(^7\) In fact, the EIR raises more questions than it answers when it discusses the CARB regulations in the context of its localized air quality analysis, rather than in the regulatory setting section of the document. The EIR states that these regulations are expected to greatly reduce future diesel vehicle emissions and therefore that the air quality index likely overstates exposure to particulates. FEIR at 4.3-47. Such assertions are particularly disingenuous because they mislead the public about how extensive the Project's health risks will be, when no analysis has yet been completed. In fact, by the EIR's account, impacts would appear to be more, rather than less, severe over time. Despite the potential for the CARB regulation to reduce tailpipe emissions, the EIR nonetheless shows that particulate emissions will increase, not decrease, in 2050. See Table 4.3-5. Even worse, the EIR acknowledges that the communities that could potentially be exposed to elevated pollutant concentrations and concomitant health risks increase over the horizon years of the Plan. FEIR at 4.3-50. Especially given its failure even to conduct the impact analysis, SANDAG should not perpetuate these claims.

\(^8\) EMFAC is the CARB's model for estimating emissions from on-road vehicles. See CARB, EMFAC 2011 Overview (September 19, 2011), attached as Exhibit 10. It includes a mobile source emissions inventory tool for assessing the population, activity, and emissions from mobile sources. These inventories are constantly being revised and updated to support the latest air quality plans and regulations. In fact, EMFAC2011 (footnote continued)
identified, the agency could convert the rates using an atmospheric dispersion model into ambient concentrations of TACs and MSATs near each of the individual highway projects. From these ambient concentrations, the agency can evaluate health risks. This approach may not result in the precise measurement that could be undertaken at the project-specific level, but uncertainties are an inherent part of estimating future conditions and do not themselves preclude analysis. We can find no logical reason to explain the EIR's failure to assess, at the very least, the health risks from a sampling of transportation facilities. Again, Table 4.3-8 discloses the location of highways that are expected to experience the highest concentrations of pollutants. Why did SANDAG not conduct a health risk study of these locations?

Guidance exists for these types of analyses. The American Association of State Highway and Transportation Officials ("AASHTO") has prepared guidelines on available analytical models and techniques to assess MSAT impacts. See AASHTO, *Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process* (March 2007), attached as Exhibit 9. These AASHTO Guidelines include over 200 pages of detailed procedures, and were designed specifically to assist transportation agencies in the evaluation of the potential health impacts caused by exposure to toxic air pollutants emitted from surface transportation sources. *Id.* at 6, 14. The AASHTO Guidelines explain that modeling tools are widely available that are capable of predicting MSAT impacts from transportation projects and that there are a variety of air quality dispersion models applicable to transportation projects. *Id.* at 2, 3 and Appendix B. Clearly SANDAG could use AASHTO's Guidelines as a starting point for preparing its own analysis of the health impacts of the RTP/SCS.

It is important to note that SANDAG has an obligation to assess not only the health risk of TACs and MSATs, but other pollutants as well. The EIR acknowledges the health risk associated with diesel particulates ("DPM"), which is considered a TAC, but exposure to PM$_{10}$ and PM$_{2.5}$ emissions also can result in health effects. There are quantitative correlations between increased levels of fine particulates and hospitalizations.

As described in an article published in the Journal of the American Medical Association, researchers "found evidence of an association between recently measured PM$_{2.5}$ concentrations and daily hospitalizations on a national scale." Francesca Dominici, includes new detailed data and methods to estimate emissions from diesel trucks and buses and future improvements. *Id.*
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Roger D. Peng et al., *Fine Particulate Air Pollution and Hospital Admission for Cardiovascular and Respiratory Diseases*, Journal of the American Medical Association, Vol. 295 No. 10 (March 8, 2006), attached as Exhibit 12. Among other findings, the researchers discovered that there was more than a statistically significant increase in hospitalization rates among seniors for each 10 μg increase in PM2.5 concentration. *Id.* Other studies also document the health risk from particulate air pollution and increased mortality. See Krewski, *Reanalysis of the Harvard Six Cities Study and the American Cancer Society of Particulate Air Pollution and Mortality*, attached as Exhibit 13, and Dockery, *An Association Between Air Pollution and Mortality Rates in Six Cities*, The New England Journal of Medicine, attached as Exhibit 14.

The EIR does not specifically acknowledge the health effects from PM emissions and therefore also does not analyze the effect the Project’s elevated PM concentrations would have on public health. Inasmuch as the EIR identifies the Project’s substantial increase in PM10 and PM2.5 emissions as a significant impact (Table 4.3-5 at 4.3-29 and 4.3-30), the document must examine the serious health effects that will result from this substantial increase in particulate pollution.

Finally, as discussed above, the EIR must be recirculated when it introduces new, significant information. Here, the FEIR includes a greatly expanded discussion of the serious implications on public health that will potentially result from the RTP/SCS. In addition, we have provided extensive evidence documenting the effect that elevated PM10 and PM2.5 concentrations has on public health. In this regard, the DEIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft EIR was essentially meaningless. *Laurel Heights Improvements Ass’n v. Regents of the University of California*, 6 Cal.4th 1112, 1130 (1993); Guidelines § 15088.5(a). Moreover, in light of the 10-day review period prior to the Board’s consideration of the Project and its EIR, the public has not had the opportunity to absorb this new information, let alone determine how the proposed RTP/SCS may impact them. The EIR must be recirculated to allow for this public review.

2. The EIR Fails to Evaluate the Project’s Potential to Conflict With or Obstruct Implementation of the State and Federal Air Quality Plans.

The EIR’s analysis of impacts relating to the Project’s potential to conflict with, or obstruct, implementation of the region’s air quality plan suffers from two serious
flaws. First, as regards the transportation component of the proposed Project, the EIR fails to analyze the Project’s consistency with the state air quality plan. Second, the EIR provides no evidence to support its conclusion that impacts relating to the Project’s land use component would be consistent with the federal or state air quality plan.

(a) **The EIR Never Evaluates the Project’s Transportation Component’s Consistency with the State Air Quality Plan.**

Determining whether a project may result in a significant adverse environmental effect is one of the key aspects of CEQA. Guidelines § 15064(a) (determination of significant effects “plays a critical role in the CEQA process”). CEQA specifically anticipates that agencies will use thresholds of significance as an analytical tool for judging the significance of a Project’s impacts. *Id.* at § 15064.7. Because the requirement to provide mitigation is triggered by the identification of a significant impact, an EIR’s failure to identify all of a project’s significant impacts also results in a failure to mitigate these impacts.

The DEIR states that the RTP/SCS would have a significant impact on the environment if it would conflict with or obstruct implementation of the region’s air quality plan. *Id.* at 4.3-14. Despite this significance threshold, the DEIR fails to perform a key component of this exercise: it does not evaluate whether the Project would conflict with or obstruct the California air quality plan (referred to as “the 2009 Regional Air Quality Strategy Revision” or “RAQS”). Instead the DEIR focuses on the Project’s conformity under the Clean Air Act to the federal air quality plan. *Id.* at 4.3-16, 17, 20, and 22.⁹

An analysis of the Project’s consistency with the RAQS is particularly important because the California Ambient Air Quality Standards (“CAAQS”) are more stringent than the National Standards. *See DEIR at 4.3-2 and Table 4.3-1 at 4.3-3.* The California Clean Air Act requires all local air districts in the state to achieve and maintain the CAAQS by the earliest practical date. *Id.* at 4.3-9. To that end, the Act requires the region to reduce ozone precursor emissions by five percent per year or, if that goal is not achievable, to develop an expeditious schedule for adopting every feasible control

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⁹ Rather than repeat the valid claims raised in the Office of the Attorney General’s September 16, 2011 Letter, we incorporate the letter by reference. *See Letter from Timothy R. Patterson and Susan Durbin to Honorable Jerome Stocks, September 16, 2011.*
measure under the air pollution control district’s purview. *Id.* at 4.3-10. In order to comply with CEQA, the EIR must evaluate whether the emissions from the Project will create new air quality violations, worsen existing violations, or delay the attainment of the CAAQS. FEIR at 4.3-18. If the results of this analysis show that the RTP/SCS would cause any of these phenomena, the impact would be deemed significant, and SANDAG must identify feasible mitigation measures capable of reducing ozone precursor emissions.

The FEIR suggests that it has conducted this analysis because it has analyzed the Project’s potential to violate an air quality standard or contribute substantially to an existing or projected air quality violation. Response V-6 at G-659. Yet this analysis, while important, does not evaluate compliance with the RAQS; the purpose of the EIR’s analysis is very different. Indeed, the EIR’s analysis of the Project’s impacts relating to consistency with the federal air quality plan did not assess air quality violations; instead, it attempted to demonstrate that the emissions associated with the RTP/SCS were actually anticipated by the federal air plan. See, e.g., 4.3-16. While the analysis may consider violations of standards as one measure of consistency with the air plan, it is not the only measure. A project may result in an isolated air quality violation yet still be considered to be consistent with an air quality plan.

An accurate analysis would have determined if the emissions from the RTP/SCS would support the goals of the RAQS. This would necessarily include: (1) a comparison of the Project’s emission estimates to those in the RAQS; and (2) incorporation of the applicable RAQS control measures in the RTP/SCS. The RTP/SCS EIR never conducts the first exercise. Nor does it identify the RAQS transportation control measures (“TCMs”) or explain how the RTP/SCS would implement them. In fact, the RAQS calls for strategies to reduce motor vehicle trips and vehicle miles travelled and the proposed RTP/SCS is certainly not consistent with this important ozone reduction strategy. See RAQS at 3-10.

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10 Indeed, that is why the CEQA Guidelines suggest that an environmental document analyze both a project’s potential to conflict with an air quality plan and a project’s potential to violate an air quality standard. Guidelines Appendix G III (a) and (b). SANDAG apparently recognizes this obligation to conduct both impact analyses since it includes a discussion of the RTP/SCS’s potential to conflict with the air quality plan (Impact AQ-1) and separately discusses the Project’s potential to violate air quality standards (Impact AQ-2). See FEIR at 4.3-19, 27.
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(b) The EIR Fails to Provide Evidentiary Support That the Project Would Be in Compliance with the Federal Air Quality Plan.  

Setting aside the issue of whether a federal conformity determination is sufficient for purposes of determining whether the Project would conflict with the federal air quality plan, the EIR fails to provide sufficient documentation that the emission estimates in the EIR in any way reflect the emissions from the proposed Project. The DEIR simply reports that the RTP/SCS would result in 39, 30 and 31 tons per day of NOx emissions in 2020, 2035 and 2050, respectively (at 4.3-17), and concludes that impacts relating to the Project’s compliance with the federal air quality plan would be less than significant. DEIR at 4.3-17, 22. The DEIR provides no supporting information—no assumptions, data or even methodology in support of these emission projections. To conclude, as this DEIR does, that an impact is less than significant, the document must provide substantial evidence. Santiago County Water Dist., 118 Cal.App.3d at 831 (an EIR must contain facts and analysis, not just an agency’s bare conclusions). Thus, the conclusion—that a Project that is expected to result in a 50 percent increase in VMT over the next 40 years will have no significant air quality impact—is unsupported by any evidence and, in fact, defies credulity.  

While the EIR suggests that the modeled emissions are located in an appendix, it is not proper to bury important analyses in background documents. Initially, CEQA requires that the analysis be presented in the EIR. See Santa Clarita Organization for Planning the Environment v. County of L.A., 106 Cal.App.4th 715, 722 (2003) (agency’s analysis must be contained in the EIR, not “scattered here and there in EIR appendices”). The decision-makers and the general public should not be forced to sift through obscure minutiae or appendices in order to ferret out the fundamental assumptions that are being used for purposes of the environmental analysis.” San Joaquin Raptor Rescue Center, 149 Cal.App. 4th at 659; see also Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova, 40 Cal.4th 412, 442 (2007) (“The data in an EIR must not only be sufficient in quantity, it must be presented in a manner calculated to adequately inform the public and decision makers, who may not be previously familiar with the details of the project.”) Moreover, the EIR’s appendix does not even provide the assumptions; instead it simply provides spreadsheets.  

(c) The DEIR Provides No Analysis of the Effect That the Project’s Land Use Component Would Have on the Region’s Air Quality Plan.
Although the DEIR concedes that the emissions of pollutants from the regional growth and land use change associated with the 2050 RTP/SCS would result in a significant air quality impact (at 4.3-16, 19, 21), the EIR fails to actually analyze the impact that would inevitably flow from this growth.\textsuperscript{11} Instead, the EIR offers up an excuse: because this is a program-level document, it is unnecessary to predict the project-specific air quality impacts of future land use changes. \textit{Id.} and 4.3-23.

The EIR has it backwards. As discussed above, because the RTP/SCS identifies this growth as part of the Project, the EIR for the Plan must analyze the potential environmental impacts resulting from it. As the Court of Appeal held in \textit{Christward Ministry, 184 Cal.App.3d} at 194,

\begin{quote}
Even if a general plan amendment is treated merely as a “first phase” with later developments having separate approvals and environmental assessments, it is apparent that an evaluation of a “first phase-general plan amendment” must necessarily include a consideration of the larger project, i.e., \textit{the future development permitted by the amendment}. Only then can the ultimate effect of the amendment upon the physical environment be addressed.
\end{quote}

\textit{Id.} (emphasis added); \textit{see also City of Redlands}, 96 Cal.App.4th at 409 (quoting same). Here, SANDAG’s EIR is inadequate because it is not a study of the “project” that is actually proposed by the agency.

SANDAG identifies the increase in population, households and employment that is expected to accompany the RTP/SCS in 2020, 2035, and 2050. \textit{See}\n
\textsuperscript{11} CEQA requires that an environmental document describe the entirety of a project, including reasonably foreseeable future actions that are part of a project, and must analyze those reasonably foreseeable actions. Guidelines § 15378(a). Agencies may not improperly “segment” projects in order to avoid preparing an EIR; instead, they must consider related actions in a single document. \textit{Laurel Heights I}, 47 Cal.3d at 395. Breaking the project into parts by leaving out the future activity is illegal segmentation and leads to inadequate environmental review. \textit{See, e.g., Bozung, 13 Cal. 3d} at 283-84 (CEQA mandates that “environmental considerations do not become submerged by chopping a large project into many little ones”). A lead agency must provide environmental review of an entire project at the time of the first approval. \textit{See, e.g., City of Carmel-By-the-Sea v. Board of Supervisors} 183 Cal. App. 3d 229, 233-35, 244 (1986).
DEIR at 4.3-15, 18. The agency certainly could have: (1) determined whether these projections exceed the estimates assumed in the regional air quality plans; (2) described the amount of exceedance; and (3) explained the implications of this exceedance. Meaningful analysis of impacts effectuates one of CEQA's fundamental purposes: to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." *Laurel Heights Improvement Assn. v. Regents of the University of California*, 6 Cal.4th 1112, 1123 (1993)("Laurel Heights II"). To accomplish this purpose, an EIR must contain facts and analysis, not just an agency's bare conclusions. *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal.3d 553, 568 (1990).

Inasmuch as the RAQS and the federal air quality plan are designed to bring the region into compliance with national and state ambient air quality standards for ozone-precursor pollutants, the EIR must analyze the actual implications of the Project’s conflict with these plans. Would implementation of the RTP/SCS push compliance with the air quality standards back by one year, five years, or ten years? What would be the health implications for the region’s residents from this lack of compliance? Simply concluding that the Project would conflict with the air quality plans does not allow decision-makers to evaluate whether implementation of the proposed Project is worth a potentially extensive delay in achieving attainment of health-based air quality standards. The EIR should be revised to explain the actual and specific implications associated with the region’s failure to attain the state and federal standards for ozone precursor emissions.

3. **The EIR Fails to Evaluate Whether the Project Would Violate an Existing Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation.**

According to the EIR, the 2050 RTP/SCS would have a significant impact if the projected emissions of criteria air pollutants in 2020, 2035, and 2050 would violate any air quality standard (“NAAQS” or “CAAQS”) or contribute to an existing or projected violation of NAAQS or CAAQS. DEIR at 4.3-22, 23. The NAAQS and the CAAQS are identified in terms of ambient levels of pollutant concentrations. See Table 4.3-1 at 4.3-3 which shows that air quality standards are based on hourly and daily ambient pollutant concentrations. See also, U.S EPA, *National Ambient Air Quality Standards*, attached as Exhibit 15.

Here, the EIR identifies the increase in emissions, but fails to translate this increase into ambient concentrations. The EIR must be revised to include the modeled
concentrations of air pollutants to determine whether the transportation projects contemplated by the RTP would violate applicable air quality standards.

E. The FEIR Fails to Adequately Analyze and Mitigate the Project’s Impact on Public Transportation.

A fundamental omission in the EIR is its failure to analyze the Project’s impact on the region’s public transportation system. CEQA includes as a significance criterion a project’s potential to conflict with public transit facilities or otherwise decrease the performance of such facilities. See Guidelines Appendix G XVI. While the Guidelines do not require that an agency rely on the CEQA significance thresholds, “lead agencies should normally address the questions that are relevant to a project’s environmental effects in whatever format is selected.” Guidelines Appendix G, Evaluation of Environmental Impacts (8).

Here, SANDAG dodges its responsibility to analyze the Project’s effect on transit by asserting that “the 2050 RTP/SCS is a regional plan that will set the regional framework and direction for other transportation plans, ordinances, policies, and programs, thereby minimizing the potential for any conflicts.” FEIR at 4.16-16. As discussed below, it is entirely because of the transportation plan’s framework and direction that the Project would impact the region’s public transit. Consequently, the EIR’s failure to conduct this impact analysis is indefensible.

1. The EIR Fails to Describe the Region’s Public Transportation in a Meaningful Manner.

An EIR’s description of a project’s environmental setting plays a critical role in all of the subsequent parts of the EIR because it provides “the baseline physical conditions by which a lead agency determines whether an impact is significant.” Guidelines § 15125(a). In our comments on the DEIR, we explained that the DEIR failed to analyze the Project’s impact on the region’s public transportation system. In large part because the EIR failed to include sufficient information about the region’s existing public transportation system, it lacked the ability to analyze how the increase in highway capacity contemplated by the Plan would impact transit systems and transit use. While the document included an ample description of the performance of the region’s existing highway network, it failed to provide this same information regarding the current operating characteristics of the region’s public transportation system. See Comment R-23 at G-532.
A thorough description of how the region’s public transportation system functions is critical. San Diego County, like many urbanized regions in the nation, has an extensive highway network. The public and decision-makers almost certainly understand how highways in the region operate. They know how to get from point A to point B on a freeway or an arterial. They know which routes to avoid during certain hours because of traffic congestion. They also have a general sense of how long it will take to get from point A to point B depending on the time of day (commute versus non-commute periods).

Yet, the vast majority of the public does not have this same level of information for the region’s public transportation system. For those who do rely on transit and especially for those that must rely on transit, there are inefficiencies in service that are extraordinarily cumbersome. Some routes may not operate on the appropriate time-tables (10-minute frequency of headways). There may be some routes that would have higher use if connections to other transit routes were more convenient (less than a 10 minute walk) or if transit connections were more timely (less than 5-minute wait for the next train or bus). Finally, there are already urbanized locations (compact development with relatively high densities) where transit could succeed but where no transit exists (i.e., transit gaps). This is the type of information we deemed critical to allow the most basic understanding of how the existing public transportation system functions.

Rather than actually describe the region’s public transportation system in this meaningful way, the FEIR merely asserts that the DEIR’s description of the transit system provided sufficient detail for a program level analysis and directs the reader to various technical appendices. See, e.g., Technical Appendix 3 (Goals and Performance Measurement) and Appendix A (2050 RTP Projects, Costs, and Phasing). Response R-23 at G-531. As discussed above, the “programmatic” nature of this EIR is no excuse for its lack of detailed information.

Indeed, this EIR is precisely the forum for describing and analyzing this large planning project “as specifically and comprehensively as possible.” Guidelines § 15168(a), (c)(5). Rather than provide a big-picture assessment of the region’s existing public transportation system, though, the FEIR directs the reader to technical appendices. Yet, these appendices are indeed technical; they consist solely of table after table of data. Consequently, they do not provide the meaningful description of how the region’s public transportation system functions, as CEQA requires. Until such a description is provided, the EIR cannot meaningfully evaluate the Project’s impact on transit, and the public and decision-makers will be left in the dark as to this important issue.
2. **The FEIR’s Analysis of Impacts on Public Transportation Remains Legally Deficient.**

The DEIR’s lackluster analysis of the Project’s impact on public transportation belies SANDAG’s claim that its goal in this RTP/SCS is to create a “world-class” transit system. FEIR at 2-8, 9. Like the DEIR, the FEIR refuses to examine these impacts and instead repeats its mantra that the RTP maximizes transit to the extent feasible. Response R-25 at G-534. As discussed below, promising to build transit is not the same as evaluating the Project’s impact on transit.

(a) **The EIR’s Performance Measures and Thresholds of Significance Are Insufficient To Evaluate the RTP/SCS’s Impact on Public Transportation.**

One of the main reasons for the EIR’s failure to study the Project’s effect on the region’s public transit system is its reliance on performance indicators and significance criteria that foster auto-oriented transportation. In our comments on the DEIR, we explained that the EIR should have included performance indicators and significance criteria that measured the sustainability of the proposed transportation network. We explained, for example, that rather than rely exclusively on performance measures such as travel time and traffic congestion levels, the EIR should have evaluated the Project’s potential to result in an increase in vehicle miles traveled (“VMT”). VMT is a very informative transportation indicator because it is a quantifiable method of gauging the extent of a region’s auto-dependency. An assessment of the Project’s effect on VMT would shed light on whether the region is continuing its trend of auto-based travel or instead shifting toward other transportation modes. It is the region’s ability to shift toward non-auto based travel that is the true measure of a sustainable transportation plan.

The FEIR explains that it did not use VMT as a significance criterion because it does not address transit, bicycle or pedestrian travel. Master Response 14 at G-37. The EIR is correct that VMT does not directly measure transit, bicycle or pedestrian travel. However, what the EIR fails to disclose is that VMT is one of the most important statistics for determining a region’s propensity to travel by automobile. See, e.g., “Growing Cooler: the Evidence on Urban Development and Climate Change,” Reid Ewing et.al, October 2007, attached to this firm’s comment letter on the DEIR.

It is not uncommon for regional planning agencies to use VMT as a gauge for studying the effect of a RTP. For example, in the San Francisco Bay Area, the Metropolitan Transportation Commission (“MTC”) used overall VMT and per capita
VMT as one of its significance criteria. See MTC, RTP EIR at 2.1-7, excerpts attached as Exhibit 16. In fact, MTC's analysis determined that the RTP's slight improvement in VMT was due to the RTP's investments in transit expansion, bicycle, pedestrian projects and sustainable land use programs. Id. at 2.1-22. In marked contrast to SANDAG's assertion, the MTC RTP EIR clearly shows that VMT can be used as a gauge to evaluate a RTP's impact on alternative modes of transportation.

Moreover, the MTC EIR also relied on other performance indicators in an effort to evaluate the region's dependence on the automobile. For example, the EIR included a measure of the RTP's projected increase in roadway lane miles in comparison to transit seat miles. The results of that analysis showed that, over the 30-year planning horizon, total transit seat miles would increase by 11 percent while total roadway lane miles would increase by only 2 percent. Id. at Table 2.1-1: Roadway Lane Miles and Transit Seat Miles. The EIR explains that this data reveals that transit capacity is increasing as a result of the RTP's improvements in the frequency of transit service and the addition of new routes. Id. at 2.1-13. The MTC EIR also evaluated how the RTP would affect the growth in daily vehicle trips. Id. at Table 2.1-8: Growth in Daily Regional Vehicle Trips. By contrast, SANDAG's FEIR, like its DEIR, refuses to ask these questions and thus does not disclose the RTP/SCS's true effect on public transportation.

In sum, because the EIR does not use proper metrics, the EIR is unable to evaluate the Project's impact on the region's public transportation system.

(b) The FEIR Fails to Resolve the Issues Raised in Our Letter on the DEIR, and the EIR's Analysis of Impacts to Public Transportation Remains Legally Inadequate.

In our comments on the DEIR, we explained that the EIR failed to analyze the impact on public transportation that would occur upon implementation of the RTP/SCS. Specifically, because the RTP/SCS would result in a substantial increase in highway capacity, we argued that the EIR should have evaluated the effect that such highway widening would have on the region's public transit.

We provided numerous examples of the deleterious effect that increases in highway capacity would have on transit. First, funding that would otherwise go to public transportation would be directed toward highway expansion projects, thereby thwarting the potential for transit ever to become a viable alternative to the automobile in the San Diego region. Second, we explained that increases in highway expansion would undercut
transit ridership since traffic congestion serves as a significant incentive for use transit. Third, highway projects would also remove riders from the transit system causing transit agencies to cut service because of declining ridership. Finally, we explained that increases in highway capacity to distant suburbs and San Diego’s backcountry would cause decentralized land use, which is inherently unsuited for transit service. See comment R-26.

Instead of responding to these substantive comments, the FEIR’s first tacit is simply to assert that the DEIR analyzed impacts to the transportation system as a whole, inclusive of all modes including transit. Response R-25 at G-534. Yet, we can find no evidence that the EIR’s “system as a whole” analysis evaluated any of the substantive impacts we identified. A legally adequate EIR “must contain sufficient detail to help ensure the integrity of the process of decision making by precluding stubborn problems or serous criticism from being swept under the rug.” Kings County Farm Bureau, 221 Cal. App. 3d at 733; Guidelines § 15151."

The FEIR then implies that the EIR has studied the RTP’s impact on transit because the Project’s “transit phasing strategy” maximizes transit to the extent feasible. The document also asserts that the 2050 RTP/SCS includes more investment in transit than any previous RTP. Response R-25 at G-534. Yet, the FEIR’s claim that the implementation of transit projects somehow serves as an analysis of the Project’s impact has no merit. The EIR must actually evaluate what the impacts will be to the current transit system as the Project gets implemented over time. In any event, what the FEIR does not state, however, is that SANDAG does not intend to implement the majority of the transit projects in the early years of the Plan. RTP/SCS 6-14, 15. Instead, it defers many of the most important transit projects, such as double-tracking the Sprinter and trolley service increases, for at least 20 years. Id. Other important trolley projects are not planned until 2040 or even 2050. Id. It is therefore entirely unclear whether the transit projects that are contemplated by the RTP in 2030 and beyond will ever be implemented. See 50-10 Plan at 10, stating that transportation agencies do not always implement the transit projects identified in transportation plans. (Moreover, as discussed below, it is feasible to implement some of these transit projects sooner than SANDAG suggests.)

Finally, the EIR suggests that its analysis of impacts on public transit is adequate because many of the highway facilities that will be constructed will accommodate transit since they will include managed lanes. Response R-25 at G-534. However, building freeways and highways that may serve transit is not the same as funding transit infrastructure and transit operations. As a panel of transportation experts concluded, managed lanes do not benefit transit. In its review of SANDAG’s approach to
transportation mobility, the Independent Transit Panel determined that "managed lanes are primarily a highway solution to mobility, not a "transit first" approach. The dramatic increase in freeway capacity that managed lanes provide will perpetuate auto-oriented development and reduce transit's competitiveness." See Wilbur Smith Associates, Independent Transit Panel Review Report at ES-5, excerpts attached as Exhibit 17. Additionally, SANDAG's policy of allowing single-occupancy vehicles to utilize the so-called "managed lanes" further undermines its claim that these lanes will provide a transit-oriented future.

In any event, the building of managed lanes cannot substitute for an analysis of the Project's impacts on the area's public transportation system. Here, because SANDAG proposes substantial increases in highway capacity within the region's most urbanized locations, the impact on existing and proposed transit service will be particularly severe. The RTP/SCS would widen numerous freeways within the exact area that SANDAG has determined that investments in transit would be the most effective. These freeways include I-5, I-8, I-15, I-805 SR-52, SR-56, SR-94, SR-125. See FEIR 2-46 through 2-51 and TA 7-7. See Urban Area Transit Study ("UATS") at TA 7-4 and FEIR at 4.13-25, stating "substantial dense growth within the urban centers corresponds with major transportation corridors such as I-5, I-8, I-15, and I-805 and these are also alignments that would have extensive transit opportunities." Despite these massive increases in highway capacity, the EIR provides no analysis of the consequences to existing public transportation service or plans for future service. The EIR's failure to provide this analysis is a fatal flaw that requires the EIR be revised and recirculated.

F. The FEIR Fails to Adequately Analyze the Project's Impact to Agricultural Land.

The FEIR states that by 2050 the roadway and transit improvements contemplated in the RTP will impact a total of 10.57 acres of land with existing agricultural uses. FEIR at 4.2-25. It also states that these projects will impact 7.05 acres of specially designated farmland. FEIR at 4.2-20. Presumably, these 7.05 acres are included within the 10.57 acres, as the specially designated agricultural lands are most likely also lands with existing agricultural uses. Although the FEIR's lack of clarity on this point renders its analysis confusing, even if the numbers are cumulative—i.e., that the RTP will impact 17.62 acres of farmland—this is still a very small amount of farmland. Indeed, it is curious that dozens of massive highway projects in the nation's 16th largest agricultural county would impact less than 18 acres of farmland. A quick check of the facts shows that SANDAG's numbers are simply inaccurate.
A number of transportation projects included in the RTP have already undergone some level of environmental review. The environmental documents for these projects show that the FEIR’s tiny acreage for agricultural impacts is incorrect. For example, the planned I-5 North Coast Corridor Project, which is part of the RTP (see FEIR at 4.2-25), would impact between 24 and 27 acres of agricultural land all by itself. See I-5 North Coast Corridor Draft EIR/EIS p. 3.3-3, attached as Exhibit 18. There are also 200 acres of “unique farmland” within the proposed right of way for the I-805/I-5 expansion project to the south of State Route (SR) 54. SANDAG, I-805/I-5 Corridor Study, Final Environmental Constraints Report, 2004, attached as Exhibit 19. This project appears to be part of the RTP. FEIR Appendix A, p. A-9. Likewise, the SR-11 and Otay Mesa East Project is expected to convert between 190 and 220 acres of farmland. SR-11 and Otay Mesa East POE FEIR/PEIS, 2008, attached as Exhibit 20. This project is also part of the RTP. FEIR Appendix A, p. A-9. Thus, these three projects by themselves will convert approximately 425 acres of farmland—nearly 25 times more farmland than acknowledged by the FEIR. Of course, it is highly likely that even more farmland will be converted by the numerous other transportation projects in the RTP.

In addition, the FEIR states that approximately 10,500 acres of agricultural land will be impacted due to regional growth and land use change by the year 2050. FEIR at 4.2-19, 4.2-24. The FEIR also acknowledges that its regional growth projections are based on current planning assumptions for San Diego County and the jurisdictions therein. FEIR at 2-5. However, the EIR for the County’s current General Plan update, which by definition reflects current planning assumptions (as of 2011), shows that the General Plan expects 55,963 acres of agricultural land to convert to non-agricultural uses by the year 2030. San Diego County General Plan Update EIR, August 2011, pp. S-7, 1-20, attached as Exhibit 21. Even though they account for conditions expected to exist 20 years sooner, these impacts are more than five times greater than the impacts identified in the FEIR.

It is not clear how the RTP/SCS EIR could use current planning assumptions for growth and determine that there will be only 10,500 acres of agricultural land impacted, when the current plans on which it bases its assumptions assume there will be more than five times as many acres impacted. SANDAG must explain if there is a basis for this discrepancy. Without any such explanation, the FEIR appears to severely underestimate the amount of agricultural land that will be impacted, in contravention of CEQA.

In sum, the FEIR’s failure to accurately account for impacts to agricultural land renders it inadequate as a matter of law.
G. The EIR Fails to Analyze the Project's Growth-Inducing Effects.

CEQA requires an EIR to include a "detailed statement" setting forth the growth-inducing impacts of a proposed project. Pub. Res. Code § 21100(b)(5); City of Antioch v. City Council of Pittsburg (1986) 187 Cal. App. 3d 1325, 1337. The statement must “[d]iscuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Guidelines § 15126.2(d). It must also discuss how projects “may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.” Id. The EIR here does not begin to meet these requirements.

The EIR concedes that the RTP/SCS would have significant growth-inducing impacts and states that the secondary impacts associated with population growth, such as impacts to agricultural, biological, and cultural resources, are analyzed in the EIR. FEIR at 4.13-8.9, 42 and 7-1, 2. Despite this pronouncement, however, we find no indication that the EIR has, in fact identified this resultant growth or evaluated its environmental consequences. Indeed, none of the EIR's environmental impact analyses (save population and housing) even mention induced or indirect growth. The EIR's analysis of impacts to agricultural resources, for example, does not differentiate between: (1) environmental impacts that would occur directly as a result of the RTP/SCS's transportation and land use components, and (2) impacts that would result from indirect growth. See FEIR at 4.2-18 through 20.

Moreover, the EIR's truncated discussion of the Project's growth-inducing consequences is vague and contradictory and therefore entirely uninformative. In one instance, the EIR states that because the Plan focuses population and economic growth in areas near transit and transportation services and in areas with existing utilities and municipal or public services, the RTP/SCS would decrease environmental impacts to vacant or undisturbed lands or open space. FEIR at 7-1. At the same time, the EIR acknowledges that the region's growth will also occur in the more remote areas of the County and will have adverse environmental effects:

Similar to the description in the 2035 analysis, growth would continue in more eastern locations of the region, such as east of I-15 in the northern area, east of SR 67 through the middle portion of the region, and east of SR 94 in the southern area. However, by 2050, spaced rural residential development would have expanded beyond areas along existing
transportation corridors and established rural communities and into areas with very minimal development at present. As shown in Figure 4.11-5, some of these areas include northeast of Escondido to SR 76, areas east of Camp Pendleton, and areas north and south of the SR 78 corridor. Large pockets of land currently used for agricultural purposes would be developed with spaced rural residential uses. FEIR at 4.3-54.

Despite the RTP/SCS’s goal of fostering efficient concentrated land development patterns, development will inevitable occur outside currently developed areas and therefore will impact vacant or undisturbed lands and/or open space. In fact, if the SCS’s land use pattern accommodates more than 80 percent of the new homes and jobs within the Urban Area Transit Strategy Study Area (RTP/SCS at 3-6), this necessarily implies that about 20 percent of this growth will occur outside the region’s urbanized areas. Consequently, about 80,000 new homes and about 100,000 new jobs could potentially be located in areas that are rural or undeveloped altogether.12 Moreover, the amount of housing and jobs in these more remote locations could be even greater assuming maximum buildout. See FEIR at 7-2; Part II.B, supra. Even though this is a staggering amount of development and growth, the EIR fails entirely to evaluate the impacts of induced growth in these undeveloped areas.

It is not hard to envision how this level of development outside the region’s urban areas will result in rapid and uncontrolled urbanization of the County’s backcountry and other rural communities. The EIR acknowledges that both Project components (transportation and land use) are growth-inducing. FEIR at 4.13-25,26. The EIR explains that the RTP/SCS used as its foundation the land use pattern derived from the region’s 2050 Regional Growth Forecast. Id. at 2-12. This land use pattern was used, in turn, to plan the transportation network in the 2050 RTP/SCS. Id. By the EIR’s own admission, these highways and freeways will be growth-inducing. Id. at 4.13-26. Thus, once the Project’s roadways are built, additional development will occur, spawning the need for additional roadways. CEQA requires the EIR to analyze not only the significant environmental effects from the land use and transportation plans included in the Project itself, but also the indirect impacts from the cycle of sprawl development that the Project’s implementation will inevitably induce.

12 The San Diego region’s 2050 Regional Growth Forecast projects that 400,000 new homes will be built and 500,000 new jobs will be added to the region by 2050. FEIR at 2-12.
The indirect impacts of sprawl are legion. Likewise, the effect of sprawl begetting more sprawl is well understood. See Daniels, *What to Do About Rural Sprawl?*, State University of New York at Albany, Department of Geography and Planning, April 28, 1999, attached as Exhibit 22. For example, rural homeowners rely on septic systems, yet often these systems are not properly sited or maintained. When septic systems fail in large numbers, sewer lines must be extended into these remote locations, often a mile or more. *Id.* Public sewer is priced according to average cost pricing, meaning that when sewer lines are extended, there is a strong incentive to encourage additional hook-ups along the line. *Id.* Thus, when a sewer line is extended a mile or more, development pressure increases along the line. *Id.* In addition, spread-out rural residents are completely auto-dependent, and residents frequently must commute long distances. *Id.* Long commutes result in the burning of more fossil fuels, producing more air pollution. *Id.* Allowing or encouraging development of rural lots of 2- to 10-acres also drives up land prices in rural fringe areas, making farming less viable. *Id.* As land prices rise, farmers are more likely to sell their land for house lots, resulting in a loss of precious agricultural lands. *Id.*

The RTP/SCS simply does not address any of these issues and impacts. Such an analysis is particularly important here because of the expansive geographic scope of this Project and its potential for radical change to the region’s rural/agricultural environment. It is only at this early stage that SANDAG can evaluate county-wide environmental impacts and explore mitigation measures and alternatives to address these impacts. *See* Guidelines § 15168(b)(4).

SANDAG references a CARB study to argue that the agency’s modeling data adequately accounts for induced traffic. This is a proposition that we dispute, but even if it were true, the CARB study does not purport to address the indirect environmental impacts—such as conversion of agricultural lands, impacts to water quantity and quality, and other impacts—from the induced growth that the EIR acknowledges will occur as a result of its Project. Thus, the CARB study cannot rescue the deficiencies in the EIR’s analysis of the Project’s growth-inducing impacts, or the lack of required mitigation.

In sum, SANDAG must revise the EIR to comprehensively address the RTP/SCS’s growth inducing impacts. In addition, inasmuch as the EIR determined that the Project’s growth-inducing impacts would be significant, the EIR must propose mitigation measures to minimize these impacts. *See* City of Antioch, 187 Cal. App. 3d 1325.
H. The FEIR Fails to Adequately Identify and Analyze Feasible Mitigation Measures for the Project’s Significant Environmental Impacts.

We and other members of the public submitted numerous comments explaining that the DEIR failed to adequately mitigate the Project’s significant environmental impacts. The FEIR dismisses the vast majority of these comments, and instead reiterates the claims made in the DEIR. Often the FEIR provides no facts or substantive analysis to support its claims, and relies entirely on conclusory statements. SANDAG thus repeatedly disregards feasible mitigation measures that could reduce the Project’s impacts, and suggests instead vague and unenforceable measures. In many cases, the agency simply elides public comments by offering “responses” that fail to address the point raised by the commenter. We will not here reiterate those comments in full. Instead, we detail below some of the FEIR’s more egregious shortcomings.

The EIR concludes that the RTP/SCS would result in 66 significant environmental impacts and then concludes, incredibly, that at least 25 of these impacts cannot be mitigated but remain significant, unavoidable and adverse. See FEIR at 7-10, 7-11. This approach violates the most basic principle of CEQA: to reduce identified impacts of growth before development is approved. See Laurel Heights I, 47 Cal.3d at 392.

SANDAG cannot abdicate its responsibility under CEQA to consider and approve specific mitigation measures that would reduce the Project’s significant impacts. The agency cannot approve a project with significant environmental impacts if there are feasible mitigation measures which would substantially lessen those effects (even if they are not completely avoided or reduced to a less than significant level). Pub. Res. Code § 21002. Moreover, an EIR may not avoid disclosure and analysis of the significant environmental impacts of a project by merely concluding that those impacts are unavoidable. CEQA does not permit a lead agency to “travel the legally impermissible easy road to CEQA compliance” by “simply labeling [an] effect ‘significant’ without accompanying analysis.” Berkeley Keep Jets Over the Bay Committee, 91 Cal.App.4th at 1371.

For the vast majority of the RTP/SCS’s significant impacts, the EIR identifies a very limited set of mitigation measures that would not, in any event, be effective in reducing Project impacts. For example, with regard to the Project’s significant transportation impacts, the EIR includes exactly one mitigation measure. This measure calls for SANDAG to work with jurisdictions and other agencies to evaluate traffic and land use for each upcoming RTP/SCS and to consider modifying, if necessary,
the transportation projects in these subsequent plans. FEIR at 4.16-38, 39. This measure is fatally flawed, for at least two reasons.

First, rather than require SANDAG to take action now, the measure merely offers a promise to study the region’s transportation system in future plans. Deferring mitigation without clear performance standards contravenes CEQA’s clear requirements. “[F]or kinds of impacts for which mitigation is known to be feasible, but where practical considerations prohibit devising such measures early in the planning process . . . , the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval.” Sacramento Old City Ass’n v. City Council, 229 Cal. App. 3d 1011, 1028-29 (1991). Here, the RTP/SCS EIR includes no performance standards.

Second, even if the measure called for SANDAG to take action in the current RTP/SCS, the measure is vague and directory. Uncertain, vague, and speculative mitigation measures have been held inadequate because they lack a commitment to enforcement. See, e.g., Anderson First Coalition v. City of Anderson, 130 Cal.App.4th 1173, 1188-89 (2005)(holding traffic mitigation fee measure inadequate under CEQA due to vagueness in program for implementing required improvements). Here, the measure simply suggests that SANDAG may consider modifications to the region’s transportation system if necessary. In other words, SANDAG proposes to wait four years and then conduct more of the same ineffective transportation planning that is evident in the proposed RTP/SCS (i.e., increases in highway capacity to reduce traffic congestion).

Importantly, if the EIR had identified adequate mitigation measures as required under CEQA, many of the Project’s significant environmental impacts could have been avoided, or at least substantially lessened. For example, SANDAG could reprioritize transportation projects now; it need not wait for the next RTP/SCS. We can find no evidence that the agency ever even attempted such a reprioritization of the Plan’s projects to remedy the Project’s extensive transportation impacts. As discussed below, in the alternatives section of this letter, front-loading at least some additional transit projects into RTP/SCS is feasible.

In comments on the RTP/SCS DEIR, members of the public pointed out numerous other mitigation measures that would lessen the Project’s transportation and other impacts. The FEIR either dismisses these measures without adequate analysis, or ignores them altogether. Despite these seemingly reasonable, and certainly feasible, suggestions for mitigation, the EIR preparers make no effort to identify other specific procedures or mechanisms to reduce the RTP/SCS’s significant environmental impacts.
For example, numerous commentors, including Sierra Club, CNFF, SOFAR and CBD, requested that SANDAG study a suite of parking management strategies. We explained the relationship between the supply and cost of parking and travel, and urged that parking management has been proven to effectively discourage automobile travel and encourage use of public transit. In fact, we provided studies supporting the viability and feasibility of such strategies in reducing transportation and other impacts related to automobile travel. Yet, the FEIR refused to include a parking management strategy as a mitigation measure. Instead, it proclaims that parking management strategies would be ineffective in substantially reducing the Project’s impacts. Master Response 15, FEIR at G-38. The document explains that SANDAG conducted tests examining the effect of changes in parking costs on the regional travel model and that these tests showed that regionwide VMT and transit share varied only slightly in response to these changes. Id.

SANDAG’s response is inadequate. The FEIR provides no description of these tests’ protocols—neither the assumptions nor the methodologies—so it is impossible to verify the accuracy of the agency’s analysis. Instead, the FEIR cites a CARB Report as the basis for SANDAG’s conclusions. Id. We can find no indication, however, that the CARB Report is incorporated by reference in the EIR. Nevertheless, we were able to locate the Report on the internet. See Exhibit 11 (CARB Information Report on the San Diego Association of Governments’ Draft SB 375 Sustainable Communities Strategy (“CARB Report”).

The CARB Report explains that the SANDAG “testing” protocol was flawed and that additional data was needed to understand the relationship between parking cost, travel, and transit ridership. Id. at 32, 33. The tests were conducted in only a few locations within the County, included the cost of parking at parking meters, and did not assume a significant change in the cost of parking. For example, while SANDAG tested the effect of 50, 75, 125, and a 150 percent change in baseline parking costs (id. at 32), on-street parking meters are generally quite inexpensive (i.e., 25 cents per hour). Increasing the cost of metered parking by 150 percent increases the hourly cost of parking to about 38 cents per hour. Moreover, even if private parking lots cost $5.00 per hour, a 150 percent increase amounts to only $2.50, not enough of an increase to cause a measurable change in travel behavior. The CARB Report summarizes SANDAG’s testing as follows:

These minor changes are likely the result of relatively small changes in parking costs compared to the region overall, and the comparatively small areas over which parking costs are
adjusted within the urban area. Additional data is needed about the parking policy being implemented and how it is reflected in the model, in order to establish a better understanding of the relationship between parking cost, travel, and transit ridership. *Id.*

SANDAG failed to include these pertinent facts in the FEIR. Consequently, the EIR provides no evidence to support the rejection of parking management strategies as an effective mitigation measure. Moreover, SANDAG itself recommends, in the context of another mitigation measure, that local jurisdictions consider the adoption of a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation. *See FEIR at ES-32.* Thus, according to SANDAG itself, parking management strategies are effective in changing travel behavior and therefore reducing transportation impacts.

The EIR fares no better in its attempt to mitigate the Project’s impact on GHG emissions. Here, too, the agency promises to include in future RTP/SCSs, policies and measures that will reduce GHG emissions. *See, e.g., ES-31.* SANDAG suggests that it has no further obligation to adopt GHG reduction strategies in this EIR because the RTP/SCS already incorporates numerous provisions that reduce GHG emissions and allow the Plan to meet SB 375’s GHG reduction targets. *Master Response 21 at G-62, Response R-36 at G-544.*

Again, SANDAG’s approach is unlawful. While the EIR does include some GHG strategies, these strategies, like the transportation mitigation measure discussed above, are vague and unenforceable and therefore would not effectively reduce GHG impacts. For example, the EIR notes that the concepts of “smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, incentive and fees, zoning, and public-private partnerships” are included in several of the EIR’s mitigation measures. *FEIR at G-62.* Yet, even in those instances where the EIR purports to include these concepts, these strategies are not specifically identified or enforceable.

For example, the EIR asserts that these strategies are contained within Mitigation Measures GHG-A. Yet, GHG-A does not mention these specific concepts at all. Instead, it calls for SANDAG to incorporate “policies and measures that lead to reduced GHG emissions” in future plans. *FEIR at 4.8-36.* SANDAG cannot, then, point to this measure to demonstrate that it is actually requiring any of these strategies. Furthermore, while one of the concepts calls for “infill development through land use designations,” this strategy was specifically rejected by SANDAG. *See Comment and
Response R-29 (our comment letter suggesting that the EIR include a measure calling for intensive land use scenarios that increase employment and residential densities around transportation corridors; SANDAG response rejecting such a measure, stating that it “does not have the legal authority to modify or require modification of local jurisdictions land use inputs.”)

Apparantly recognizing the flaws in its approach to the mitigation measure calling for other agencies to adopt and implement climate action plans (“CAPs”) (GHG-B), the FEIR now provides some additional information. It does not, however, provide either: (1) a model CAP, as we suggested, or (2) a source of funds so that agencies have the financial means to prepare their own CAPs. See Comment R-36. Nor does the FEIR explain why SANDAG could not have adopted a measure that requires SANDAG itself to take some action to effectively reduce GHG emissions. Rather than substantively responding to our comments in this regard, the FEIR simply provides some suggestions for what these other agencies might want to consider including in the CAPs. See FEIR at 4.8-36 through 38. Tellingly, the FEIR still uses terms such as “should” and “when appropriate,” thus providing no assurance that this measure will be effective to reduce GHG emissions.

SANDAG also does not consider revising this measure to incorporate actions within its own authority, such as increasing cost-effective transit and promoting infill development, that could reduce GHG emissions. Certainly, SANDAG could limit or restrict altogether funding for local jurisdiction’s transportation projects unless these jurisdictions have adopted CAPs that include performance standards demonstrating that they will achieve the necessary GHG emission reductions. The San Francisco Bay Area’s Metropolitan Transportation Commission (“MTC”) takes such a proactive approach when it conditions the allocation of regional discretionary funds on local agencies’ demonstration that they are implementing land uses capable of supporting transit. See MTC, Transit-Oriented Development (“TOD”): Transit Villages, Policies and Studies, attached as Exhibit 23, and MTC TOD Policy, attached as Exhibit 24.

In contrast to SANDAG, MTC actually adopted and implemented these programs, demonstrating that agency’s commitment to pursuing transit and land use programs to effectively reduce GHG emissions. Like SANDAG, MTC has no direct land use authority. Yet by holding the region’s transportation purse strings, MTC has tremendous leverage to bring about planning change and reductions in GHG emissions. Thus, while SANDAG promises to adopt a TOD program in its next RTP/SCS (FEIR at 2-33 and RTP-SCS response to comment 1689 at 199), MTC has already implemented this effective program. Like MTC, SANDAG has the authority to adopt such a program.
now to further minimize the significant GHG impacts that would result from the 2050 RTP/SCS.¹³

SANDAG can and must adopt a TOD program—which, as demonstrated, is a feasible mitigation measure being implemented by a similarly situated agency—as part of the 2050 RTP/SCS. It should model its program after MTC’s policy and include financing strategies as MTC’s policy does. See Reconnecting America, Financing Transit Oriented Development in the San Francisco Bay Area: Policy Options and Strategies, attached as Exhibit 25. Such a TOD program would also serve to mitigate the Project’s significant transportation impacts discussed above.

It is important to note that SANDAG has been down this road before. Indeed, four years ago, SANDAG promised to seriously address GHG emissions in its next RTP (i.e., the 2050 RTP/SCS). SANDAG specifically included a mitigation measure in the EIR for the 2007 RTP that promised to identify an “action plan” and “possible funding sources for SANDAG to implement a course of action and implement measures to address climate change in the RTP.” See Letter from Shute, Mihaly & Weinberger LLP to Chair Sessom, SANDAG Board Member, November 14, 2007, attached as Exhibit 26; see also Settlement Agreement between SANDAG and SOFAR, Affordable Housing Coalition of San Diego County, Citizens for Responsible Equitable Environmental Development, and San Diego Public Transit Riders’ Alliance, April 29, 2008, attached as Exhibit 27. Even though the 2050 RTP/SCS continues to result in significant and unavoidable climate change impacts, SANDAG has not lived up to this promise.

We see no reason to wait another four years with a mere hope that the agency will take this issue more seriously next time. SANDAG has the means, as well as the legal obligation, to implement feasible, concrete, and enforceable mitigation measures to reduce GHG emissions now.

Furthermore, inasmuch as the FEIR does not include a model CAP, we are attaching the City of San Carlos’ Plan, as Exhibit 28. San Carlos’ CAP, adopted in 2009, includes effective strategies to reduce GHG emissions. We strongly urge SANDAG to prepare a model CAP similar to that of San Carlos.

¹³ Nor can SANDAG suggest that it had no knowledge of this program. Commentors brought MTC’s program to SANDAG’s attention. See Response to RTP/SCS comment number 1689.
Finally, SANDAG should adopt a mitigation measure that will ensure additional funds for public transportation operations in the region. Additional operational funding, in particular, is critical in order to reduce the RTP/SCS’s significant impact on transportation, air quality and climate change. The FEIR states that “most of the highway facilities to be constructed over the next ten years support public transit because they will be available for carpools and buses” and “SANDAG provides FasTrak funding to the transit operators for transit services in these corridors.” R-25 at G-534 and Master Response 7 at G-16. The EIR never discloses, however, whether these FasTrak monies (or any other funding source that is generated by the use of these managed lanes) are earmarked exclusively for transit service operations (i.e., specifically for bus, light rail and heavy rail service). If 100 percent of these monies is not already earmarked for bus or rail, SANDAG should commit to placing these monies in a trust fund exclusively for transit operations.

I. The FEIR Fails to Identify and Analyze a Reasonable Range of Alternatives to the Project.

Under CEQA, a proper analysis of alternatives is essential to comply with the Act’s mandate that significant environmental damage be avoided or substantially lessened where feasible. Pub. Res. Code § 21002; Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); Citizens for Quality Growth v. City of Mount Shasta, 198 Cal.App.3d 433, 443-45 (1988). As stated in Laurel Heights I, “[w]ithout meaningful analysis of alternatives in the DEIR, neither the courts nor the public can fulfill their proper roles in the CEQA process . . . . [C]ourts 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.” 47 Cal.3d 376, 404. The discussion of alternatives must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Guidelines § 15126.6(b). Furthermore, CEQA requires that SANDAG evaluate a reasonable range of alternatives to its Project.

Here, the EIR fails to heed these basic mandates. Although the EIR identifies six alternatives, there is very little substantive difference between each of the alternatives. While the EIR purports to include two transit emphasis alternatives, they are crafted in a manner so that their environmental impacts differ only slightly from—or even result in greater impacts than—those resulting from the RTP/SCS. For example,
one would expect that Alternative 3b: Transit Emphasis/Modified Phasing/Modified Land Use would be designed in a manner consistent with its title. It would front-load the vast majority of the RTP/SCS’s transit projects to the first ten years of the Plan, include additional transit projects, and delay or eliminate the Project’s highway projects. Yet, this Alternative does none of that. Instead, it actually implements the majority of highway projects included the 2050 RTP/SCS. FEIR at 6-23, 6-30 and Table 6.2-6. While the Alternative advances some of the transit projects, it still proposes to defer at least half of the transit projects to the middle or latter phases of the Plan. See Table 6.2-7. Notably, the Alternative does not add any transit service to that proposed in the RTP/SCS.

In comparing Alternative 3b to the Project, the EIR determines that impacts relating to the GHG emissions would be greater than the GHG impacts of the Project. Id. at 6-128. Yet, because the EIR’s discussion provides none of the relevant details or assumptions, let alone substantive analysis, it is not possible to substantiate the EIR’s conclusions. If Alternative 3b had been crafted to eliminate or greatly reduce highway projects,\textsuperscript{14} it would have been logical to conclude that by 2050, GHG impacts would be considerably less than the proposed Project. At the same time, the EIR determines, illogically, that Alternative 3b would result in reduced air quality impacts compared to the Project in 2050 (see FEIR at 6-122). This nonsensical conclusion is also unsupported by substantial evidence.

Most importantly, the EIR determines that the Project’s transportation impacts would be greater under Alternative 3b than the RTP/SCS. FEIR at 6-140. Here, because the EIR does not front-load all, or the vast majority, of the transit, Alternative 3b is destined to fail. As discussed in our prior letter and in the 50-10 Plan, the San Diego region has an incomplete transit network. Therefore, to ensure the success of any transit-focused plan, SANDAG must implement enough transit to complete a network so that transit can become competitive with the automobile.

The FEIR states that an EIR is not required to consider “every conceivable alternative to a project” and that “absolute perfection” is not the legal standard. Master Response 16, FEIR at G-40. We are, by no means, seeking perfection. We are, however, interested in an alternative that is clearly different from, and environmentally superior to, the 2050 RTP/SCS, as required by CEQA. The purpose of such an alternative would be

\textsuperscript{14} For example, the Alternative could have included only those highway projects that are necessary for maintenance.
Chair Jerome Stocks and Members of the Board  
October 27, 2011  
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...to substantively reduce the RTP/SCS’s significant and unavoidable impacts in the vast majority of the impact areas: aesthetic and visual resources, agriculture and forest resources, air quality, biological resources, cultural resources, greenhouse gas emissions, noise, population and housing, and recreation. See ES-11 through ES-52. Thus far, SANDAG has not identified such an alternative. Each of the alternatives, with the exception of No Project, continues to result in significant and unavoidable impacts. SANDAG must evaluate a transit alternative that truly prioritizes transit in order to reduce the RTP/SCS’s extensive environmental impacts.

CNFF and SOFAR have developed an alternative to the RTP—the 50-10 Plan—yet SANDAG erroneously declines to evaluate the alternative or include it in the EIR. The FEIR lists several reasons for its refusal to include this alternative. We address each of these issues below.

First, the FEIR states that it cannot consider a “transit only” alternative because, to comply with federal transportation law and SB 375, the RTP/SCS must address transit projects, highway projects, and sustainable land use patterns—and that all three components must be integrated into the EIR’s fundamental project objectives. FEIR at G-40 and 41. The FEIR then states that when a large-scale program contains multiple, interrelated objectives, the agency may exclude an alternative that does not meet all of those objectives. Id. This argument lacks merit. The 50-10 Plan is not a “transit only” alternative. Rather, it calls for front-loading the RTP/SCS’s transit projects in the first ten years of the plan and deferring the highway projects until such time as a comprehensive public transit network is implemented in the region’s urban core. Therefore, the 50-10 Plan would satisfy the core objectives of the Project. Moreover, even if the 50-10 Plan required changes to federal or state law (which it does not), the fact that some legislative action would be required is not a sufficient reason to reject an alternative. Citizens of Goleta Valley, 52 Cal. 3d at 573. If inappropriate from an environmental standpoint, this alternative should have been given serious consideration. Without such analysis, the EIR again asks the public and decision-makers to accept, rather than examine, its conclusions.

Furthermore, an EIR cannot provide a meaningful comparison between a proposed project and various alternatives unless the project’s objectives are defined broadly enough to make such options at least potentially possible. See Kings County Farm Bureau, 221 Cal. App. 3d at 735-37; City of Santee v. County of San Diego 214 Cal. App. 3d 1438, 1455 (1989). Here, the EIR essentially states that highways must be built as planned by the proposed 2050 RTP/SCS. This is tantamount to saying that the objective of the Project is to implement the Project. Narrowing the Project’s goals in this

SHUTE, MIHALY  
CO—WEINBERGER LLP
way tilts the analysis of alternatives unavoidably—and illegitimately—toward the RTP/SCS as proposed. Rather than providing the required reasoned, objective analysis, the RDEIR has become "nothing more than [a] post hoc rationalization[""] for a decision already made. *Laurel Heights I*, 47 Cal. 3d at 394.

Second, the EIR then switches gears to suggest that the 50-10 Plan is already within the scope of the transit components of the 2050 RTP/SCS and alternatives. FEIR at G-47. This assertion— that the 50-10 Plan is a mere variation of the RTP/SCS— is as absurd as it is disingenuous. While one of the major differences between the 50-10 Plan and the 2050 RTP/SCS is the timing of the transit and highway projects, it is not the only "meaningful" difference, as SANDAG asserts. As is discussed below, other components of the 50-10 Plan, such as revisions to TransNet and pursuing other approaches to funding transit, are critical for the implementation of a comprehensive transit network in the County. Moreover, the importance of timing cannot be understated. As we explained in our prior letter, by proposing such a substantial increase in capacity throughout the County, SANDAG is all but foreclosing the potential for public transportation ever to succeed in the region.

Third, the FEIR states that it has no obligation to evaluate the 50-10 Plan because we have not provided the substantial evidence that this alternative would reduce the environmental impacts resulting from the 2050 RTP/SCS. FEIR at G-47. Indeed, the FEIR states that it is the public's responsibility to provide a "regional analysis" demonstrating the environmental benefits of the 50-10 Plan to the San Diego region. *Id.* We find it remarkable that SANDAG suggests that members of the public must undertake a regional analysis of this alternative. It is the agency's responsibility to provide this information to the public, not the other way around.

Moreover, contrary to this assertion, we did provide evidence demonstrating: (1) that the suite of strategies relied on by SANDAG, which include heavy reliance on roadway expansion projects, is environmental harmful, and (2) the environmental benefits that would accompany increased transit use. *See, e.g., Urban Land Institute, Growing Cooler: Evidence on Urban Development and Climate Plan,* attached to our July 22, 2011 comment letter. For example, the Urban Land Institute report states that:

As a larger and larger share of our built environment has become automobile dependent, car trips and distances have increased, and walking and public transit use have declined. Population growth has been responsible for only a quarter of
the increase in vehicle miles driven over the last couple of decades. A larger share of the increase can be traced to the effects of a changing urban environment, namely to longer trips and people driving alone. As with driving, land is being consumed for development at a rate almost three times faster than population growth. This expansive development has caused CO₂ emissions from cars to rise even as it has reduced the amount of forest land available to absorb CO₂. Id. at 2.

Furthermore, the 50-10 Plan itself identifies environmental benefits associated with the 50-10 Plan and compares these benefits to the environmental impacts that would result from implementation of the RTP/SCS. See, e.g., 50-10 Plan at 15 (discussing the reduction in VMT and traffic congestion that will accompany the 50-10 Plan). In addition, we have attached several studies to this letter that provide further evidence demonstrating that the increase in transit use that would accompany the 50-10 Plan would reduce traffic congestion (once the comprehensive transit network is implemented), reduce criteria air pollutant emissions (and the public health impacts that result from exposure to these emissions), reduce GHG emissions, protect open space and agricultural lands, and reduce energy use. See Center For Transportation Excellence, Transit Benefits, attached as Exhibit 29; see also CARB Air Quality and Land Use Handbook (attached to this firm’s letter on the DEIR); Exhibit 9 (AASHTO “Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process; Exhibit 22 (SUNY Study).

Fourth, the FEIR asserts that the 50-10 Plan alternative is legally and economically infeasible. FEIR at G-24, 48. However, neither of these claims has merit. SANDAG suggests in Master Response 17 that the 50-10 Plan alternative is legally infeasible because federal law requires RTP’s to be revenue-constrained, i.e., include only projects that are based on reasonable revenues. Id. The FEIR also refers to "funding restrictions" that prevent major shifts in funding from highway projects to transit. Id. The FEIR fails, however, to provide detail regarding these restrictions; it does not identify the specific funds that are "restricted," or even whether they are federal, state, or local funds.

To the extent that the FEIR suggests these funding restrictions prevent SANDAG from modifying TransNet projects and phasing, the TransNet Ordinance clearly indicates that the TransNet Expenditure Plan can be modified. The Board has the authority to modify, or at least to propose modifying, the Expenditure Plan. TransNet Ordinance section 16 states: "... this ordinance may be amended to further its purposes
by ordinance, passed by roll call vote entered in the minutes, with two-thirds of the Commission concurring consistent with the Commission’s standard voting mechanism. See TransNet Extension & Ordinance, Exhibit 30. Proof that modifying the Expenditure Plan is possible is contained in the FEIR itself, which lists four examples of amendments to the Expenditure Plan that the Commission has made since passage of the TransNet Extension in 2004. See FEIR at G-49 [citing 2006 amendment to include completion of SPRINTER; 2008 amendment to extend deadline to fund habitat conservation plans; 2009 amendment regarding RTCP auditing; 2009 amendment to extend deadline to fund habitat conservation plans]. Inasmuch as SANDAG has modified the TransNet Expenditure Plan in the past, it could undertake additional modifications and remain within federally required revenue constraints. Consequently, it does not appear that TransNet is a major constraint to funding transit.

SANDAG’s assertion that it is has limited flexibility to shift funding from highways to transit due to restrictions in federal and state funding, is simply not supported by substantial evidence. To the contrary, federal agencies, in particular, are seeking new opportunities to ensure sustainable communities. For example the USEPA, the Housing and Urban Development (“HUD”), and the Department of Transportation (“DOT”) have initiated an interagency effort to help communities nationwide to improve access to affordable housing, to increase transportation options, and to lower transportation costs while protecting the environment and peoples’ health. See DOT et al., Leveraging the Partnership: DOT, HUD, EPA Programs for Sustainable Communities (April 2010), attached as Exhibit 31. To achieve these objectives, this interagency partnership makes clear that opportunities exist for flexibility in highway/transit funding.

Many Federal-Aid Highway programs have specific eligible transit activities identified in legislation. In addition, funds from other programs that do not have specific transit eligibility may be transferred by states to other Federal-Aid Highway programs that do have such eligibility. If funds are transferred from one Federal-Aid Highway program to another, those funds then have the same eligibility as the program that they are transferred to. For example, Interstate Maintenance (IM) funds transferred to the Surface Transportation Program (STP) would have the same eligibility as STP funds. To transfer funds from FHWA to FTA, the state department of transportation must request that the funds be transferred, with the concurrence of the MPO if
the project is within a metropolitan planning area, in a letter
to the FHWA Division Office. Funding transfers are
permitted only for projects contained in an approved
metropolitan transportation improvement program (TIP)
and/or statewide transportation improvement program (STIP).

Id. at 6.

It is unclear whether SANDAG has taken advantage of this opportunity—or
investigated other transit-supporting federal grant programs to which the agency could
apply, either directly or through the state DOT. We are attaching to this letter
information pertaining to various grant programs that could provide funding for transit.
For example, DOT has identified a series of grant programs funding transportation
projects that enhance or relate to livability. See DOT, DOT Livability: Grants and
Programs, attached as Exhibit 32, and DOT, Federal Transit Administration,
Metropolitan and Statewide Planning, attached as Exhibit 33. Certainly SANDAG could
have included an evaluation of these and similar funding opportunities prior to rejecting
the 50-10 Plan Alternative. Furthermore, as discussed above, even if legislation changes
regarding funding were necessitated by the 50-10 Plan, such changes do not render the
alternative per se infeasible.

In sum, SANDAG fails to support with substantial evidence its rejection of
the 50-10 Plan. Moreover, if SANDAG cannot fully implement the 50-10 Plan
alternative, it could certainly develop a different option that prioritizes transit. For the
reasons explained in our various submittals, such an alternative would substantially
reduce many, if not all, of the myriad significant and unavoidable impacts that would
accompany implementation of the 2050 RTP/SCS.

Finally, it is important to note that the FEIR inappropriately rejects the Fast
Plan alternative, claiming that the 2050 RTP/SCS would achieve a similar level of
network connectivity and high-speed service (*i.e.*, transit service). Because SANDAG’s
model is not available to the public, however, it is impossible to evaluate how the
RTP/SCS itself would affect this transit service, let alone compare the Fast Plan
alternative to the RTP/SCS. Although, after threat of litigation, SANDAG provided
CNFF and SOFAR with limited access to SANDAG’s travel demand modeling software,
this license agreement with SANDAG “automatically terminated” on October 1, 2011. In
fact, the license agreement requires that we destroy any copies of the travel demand
software. See Settlement Agreement and Limited License, paragraph 11(i), and related
correspondence, attached as Exhibit 34. Without access to the model, we had no
opportunity or ability to compare the 2050 RTP/SCS to the Fast Plan alternative, or to
assess other of SANDAG's responses to comments. SANDAG may not use its own lack of transparency as a shield to defend its myopic focus on the 2050 RTP/SCS, or its refusal to analyze other potentially feasible alternatives such as the Fast Plan and the 50-10 Plan.

III. CONCLUSION

For the reasons set forth above, we respectfully request that SANDAG refrain from approving the 2050 RTP/SCS until it has prepared and recirculated an EIR that fully complies with CEQA.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Rachel B. Hooper, Esq.

Laurel L. Impett, AICP, Urban Planner

CENTER FOR BIOLOGICAL DIVERSITY

Kevin Bundy, Esq.

SIERRA CLUB

Pamela Epstein, Esq.
List of Exhibits:

Exhibit 1. *Sierra Watch v. Placer County*, Case No. SCV 16652 (Decision Granting Writ of Mandamus), May 3, 2005

Exhibit 2. California Attorney General, *Frequently Asked Questions About Climate Change and CEQA*

Exhibit 3. CARB, *Recommended Approaches for Setting Interim Significance Thresholds for GHGs under CEQA*


Exhibit 5. CARB, *Scoping Plan*

Exhibit 6. California Climate Change Center, *Our Changing Climate, Assessing the Risks to California*

Exhibit 7. American Lung Association, *State of the Air*


Exhibit 12. Francesca Dominici, et al., *Fine Particulate Air Pollution and Hospital Admission for Cardiovascular and Respiratory Diseases*, 2006
Exhibit 13. Daniel Krewski, Reanalysis of the Harvard Six Cities Study and the American Cancer Society of Particulate Air Pollution and Mortality


Exhibit 15. U.S. Environmental Protection Agency, Ambient Air Quality Standards

Exhibit 16. MTC, Regional Transportation Plan EIR, excerpts


Exhibit 18. I-5 North Coast Corridor Draft EIR/EIS, relevant excerpts


Exhibit 20. SR-11 and Otay Mesa East POE PEIR/PEIS, 2008, relevant excerpts

Exhibit 21. San Diego County General Plan Update EIR, 2011, relevant excerpts


Exhibit 23. MTC, Transit-Oriented Development ("TOD"): Transit Villages, Policies and Studies

Exhibit 24. MTC, TOD Policy

Exhibit 25. Reconnecting America, Financing Transit Oriented Development in the San Francisco Bay Area: Policy Options and Strategies

Exhibit 26. Letter from Shute, Mihaly & Weinberger LLP to Chair Sessom, SANDAG Board Member, regarding the 2007 RTP EIR, November 14, 2007

Exhibit 27. Settlement Agreement between SANDAG and SOFAR, Affordable Housing Coalition of San Diego County, Citizens for Responsible Equitable Environmental Development, and San Diego Public Transit Riders’ Alliance, April 29, 2008
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Exhibit 28.  *San Carlos General Plan 2030*

Exhibit 29.  Center For Transportation Excellence, *Transit Benefits*

Exhibit 30.  TransNet Expenditure Plan

Exhibit 31.  DOT, et al., *Leveraging the Partnership: DOT, HUD, EPA Programs for Sustainable Communities*, 2010

Exhibit 32.  DOT, *DOT Livability: Grants and Programs*

Exhibit 33.  DOT, Federal Transit Administration, *Metropolitan and Statewide Planning*

Exhibit 34.  Settlement Agreement and Limited License and related correspondence
Large Majority of Californians Supports Implementation of Climate Change Laws

Favors state law requiring CA to reduce greenhouse gas emissions (67%)

Thinks efforts to reduce global warming will likely increase (45%) or wouldn't affect (24%) jobs (69%)

*From Public Policy Institute of California Statewide Survey, July 20, 2010.*

Moving San Diego to a Clean Energy Future

*Sept 24 – Balboa Park – photo by Amie Barder*
Doesn’t the RTP Meet the CARB Requirements?

- 7% reduction in per capita GHG emissions by 2020
- 13% reduction in per capita GHG emissions by 2035
- What’s the problem?

The problem is that these are per capita figures. While the RTP does technically meet these CARB requirements, according to the RTP total emissions go up between 2020 & 2050
Can it be done? YES!

- More transit sooner
- No new highways or expansions
- Reallocate transnet $ to transit
- Develop strategies to make transit competitive

REDO THE RTP –

Do it Right!
Lets Do the Right Thing Now
We don’t have 4 years to wait!

Mike Bullock
mike_bullock@earthlink.net
760-754-8025

Climate Data
• Keeling Curve:
  http://en.wikipedia.org/wiki/An_Inconvenient_Truth#Scientific_basis

Atmospheric Carbon Dioxide
Measured at Mauna Loa, Hawaii

Carbon dioxide concentration (ppmv)

![Graph showing atmospheric carbon dioxide levels over time.](chart)
Our Climate Crisis

- From: http://en.wikipedia.org/wiki/An_Inconvenient_Truth#Scientific_basis

![Temperature and CO₂ Records](chart1)

- S-3-05’s goal is to cap CO₂ at 450 PPM

Current Level of CO₂ is 390 PPM

Our Climate Crisis

- Earth & Space Research (ESR) website:
  http://www.esr.org/outreach/climate_change/mans_impact/man1.html

![Temperature and CO₂ Records](chart2)

- S-3-05’s Goal is to cap CO₂ at 450 PPM, which is off this chart.

Current level = 390 PPM
S-3-05, Signed in 2005

- GHG Emission Trajectory:
  - 2000 levels by 2010
  - 1990 levels by 2020 (AB 32)
  - 80% below 1990 levels by 2050

- Achieved by Plans & Status
  - Every 2 years
  - For transportation:
    CALTRANS & CARB → Cal EPA → Governor

If the world achieves these reductions, our levels of atmospheric CO₂ₑ will be capped at 450 PPM. However, 350 PPM is needed for climate stability. We are at 390 now. The world must stop burning fossil fuel before 2050.

The remaining slides are about transportation.

Trajectories to Support Calculations

Purple (Low carbon fuel), Green (C02/Mile), & Gold (S-3-05)

In San Diego County, 41% of GHG emissions come from cars and light-duty trucks.

Figure 1: Increasing VMT Threatens to Overwhelm Greenhouse Gas Savings From Cleaner Fuels and Vehicles

Source: I. Winneke, Based on CALTRANS VMT forecast, AB 1493 and LCFS.
SB 375’s Per-Capita VMT Reduction for 2035, to Support S-3-05

<table>
<thead>
<tr>
<th>Variable Name</th>
<th>Definition</th>
<th>Taken From</th>
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<tbody>
<tr>
<td>f</td>
<td>net factor of the emissions of Greenhouse Gas</td>
<td>Gold Line¹</td>
</tr>
<tr>
<td>f_Pavley</td>
<td>factor of the average statewide mileage</td>
<td>Green Line¹</td>
</tr>
<tr>
<td>f_Fuel</td>
<td>factor of the reduction of GHG due to low-carbon fuels</td>
<td>Purple Line¹</td>
</tr>
<tr>
<td>f_Population</td>
<td>factor of the population in the region of interest</td>
<td>CARB²</td>
</tr>
<tr>
<td>f_PerCapitaVMT</td>
<td>factor of per capita driving</td>
<td>Computed</td>
</tr>
</tbody>
</table>

¹From the Chart constructed by Steve Winkleman, as shown in the "Guide to SB 375" report.

\[ f = f_{\text{PerCapitaVMT}} \times f_{\text{Population}} \times f_{\text{Pavley}} \times f_{\text{Fuel}} \]

\[ f_{\text{PerCapitaVMT}} = \frac{f}{(f_{\text{Population}} \times f_{\text{Pavley}} \times f_{\text{Fuel}})} \]

Per-Capita VMT Reduction for 2035, as Required by S-3-05

\[ f_{\text{PerCapitaVMT}} = \frac{f}{(f_{\text{Population}} \times f_{\text{Pavley}} \times f_{\text{Fuel}})} \]

\[ f_{\text{PerCapitaVMT}} = 0.525 / (1.313 \times 0.685 \times 0.9) \]

\[ f_{\text{PerCapitaVMT}} = 0.649 \]

This is a 35.1% decrease in GHG or VMT.

The proposed RTP only achieves 13%!

Because .649 * 1.313 = .8515, in 2035, the people in San Diego County must drive 15% less than they did in 2005, even with the 31.3% increase in population. Therefore, why add lanes?
Strategies to Achieve 35%

• Stop expanding freeways
  – No need, because we must drive less
  – Eliminate congestion with following strategies

• Reallocate freeway expansion funds to transit

• Pricing to increase fairness & choice
  – Parking demonstration projects to unbundle cost
  – State legislation
    • Unbundle the cost of all “free” parking
    • Equitable and environmentally-sound road-use fee pricing

• Smart growth, complete streets, bicycle education

San Diego County Voter Preference

• Opinion poll of San Diego County Voters
  – Fairbank, Maslin Maullin, Metz & Associates
  – Sept 14, 2010

Preference, Between Expanding Transit or Roads & Highways

- Expanding public transit, including buses and rail
  - 55%

- Expanding roads and highways
  - 32%

- Both, neither, don’t know
  - 13%
Let's Do the Right Thing Now

The selected governments have little to gain from freeway expansions and probably understand the harsh truth of our climate crises.

Potential Alliance to Redirect SANDAG

<table>
<thead>
<tr>
<th>Government</th>
<th>Weighted Votes</th>
<th>Alliance For Change</th>
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<tbody>
<tr>
<td>Carlsbad</td>
<td>3</td>
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<tr>
<td>Chula Vista</td>
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<td>7</td>
</tr>
<tr>
<td>Coronado</td>
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<td>0</td>
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<tr>
<td>County of San Diego</td>
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<tr>
<td>Del Mar</td>
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<tr>
<td>El Cajon</td>
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<tr>
<td>Escondido</td>
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<td>Imperial Beach</td>
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<tr>
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<tr>
<td>Oceanside</td>
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<tr>
<td>San Diego</td>
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</tr>
<tr>
<td>San Marcos</td>
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</tr>
<tr>
<td>Santee</td>
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<td>0</td>
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<tr>
<td>Solana Beach</td>
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<td>1</td>
</tr>
<tr>
<td>Vista</td>
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<td>0</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>100</strong></td>
<td><strong>51</strong></td>
</tr>
</tbody>
</table>

On 12/17/10, Del Mar, La Mesa, and Solana Beach voted NO on the RTP approved for the DEIR.

This is 1 more vote than what is needed to block any approval. Approval requires 51 weighted votes.

Background Charts

Mike Bullock
mike_bullock@earthlink.net
760-754-8025
SB 375, Year 2035 VMT Reduction Summary

• 13%, request from SANDAG, to CARB
  – Claim: this was “Aggressive but Achievable”

• 13%, from CARB to SANDAG
  – Official target
  – Parroted claim “Aggressive but Achievable”

• 13%, SANDAG current calculation in RTP
  – SANDAG wrote 18% on December 17th

• 35%, value needed to achieve S-3-05

CARB’s Culture of Avoidance

----- Original Message ----- From: Withycombe, Earl@ARB
To: Mike Bullock
Sent: Monday, August 16, 2010 9:02 AM
Subject: RE: Your Draft

Hi Mike,
I have drafted a response to your question, and management is reviewing it. When I get approval, I will get back to you on the 2035 question. Thanks for your detailed analysis.

Earl Withycombe, P.E.
South Coast AQMD Planning Liaison
Planning & Technical Support Division
California Air Resources Board
916-322-8487 voice
916-322-3646 fax
ewithyco@arb.ca.gov email

Bullock’s Note:
Earl then called me and told me his management told him to never email me information about my question, which was why didn’t CARB ‘s SB 375 targets, for 2035, have to support S-3-05. Please do not be an accessory to CARB’s violation of S-3-05.
Global Warming Background

We must act decisively, now

- The June *Scientific American* states that the warming caused by the level of equivalent CO2, expected (!) within a few decades, will result in a 5% chance of an increase of 14.4 Degrees Fahrenheit and that this poses a risk of “a devastating collapse of the human population, perhaps even to extinction.”

21st Century Transportation Solutions

- Redesigned rail or monorail systems
  - Electric, automated, 24/7, frequent service
- Commitment to clean-bus technology
- Equitable driving fees to reduce taxes
- Unbundled car parking cost
One More Conclusion
27 October 2011

Board of Directors
San Diego Association of Governments
401 B Street, Suite 700
San Diego, CA 92101

Re: Item 9 on October 28, 2011 Agenda (2050 Regional Transportation Plan and Sustainable Communities Strategy)

Dear Directors:

I am writing on behalf of CREED-21 and The Affordable Housing Coalition of San Diego County ("AHCSDC") to oppose approval of the above-referenced item. Both CREED-21 and AHCSDC are non-profit community organizations that advocate on behalf of their members on land-use, quality-of-life, and good governance issues. In general, approval of the project would violate the California Environmental Quality Act and other laws. The environmental impact report is inadequate and you cannot make the findings required under Public Resources Code Section 21081 and CEQA Guidelines Sections 15090 and 15092 or support the findings with substantial evidence.

CREED-21 and AHCSDC agree with and support many of the comments that have already been submitted. In particular, CREED-21 and AHCSDC support the comments submitted by the Attorney General in the letter dated September 16, 2011. Enclosed on the attached CD are copies of many of the documents referenced in that letter as well as additional evidence that supports the points made by the Attorney General’s office. CREED-21 and AHCSDC also strongly agree with the environmental justice concerns raised by the Environmental Health Coalition and others.

Thank you for your attention to this matter.

Sincerely,

Mekaela M. Gladden
## INDEX OF EXHIBITS
2050 Regional Transportation Plan and Sustainable Communities Strategy

<table>
<thead>
<tr>
<th>Exhibit</th>
<th>Description</th>
<th>DATE</th>
</tr>
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<tbody>
<tr>
<td>GHG1</td>
<td>Assembly Bill No. 32</td>
<td>September 27, 2006</td>
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<tr>
<td>GHG2</td>
<td>“Not too late to save the polar bear,” Center for Biological Diversity Report</td>
<td>October 17, 2007</td>
</tr>
<tr>
<td>GHG3</td>
<td>Arctic Sea Ice Data</td>
<td>Not Identified</td>
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<tr>
<td>GHG5</td>
<td>“Our Changing Climate: Assessing the Risks to California”</td>
<td>Not identified</td>
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<td>GHG6</td>
<td>The Copenhagen Diagnosis</td>
<td>November 2009</td>
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<tr>
<td>GHG7</td>
<td>California Natural Resources Agency-Final Statement of Reasons for Regulatory Action</td>
<td>December 2009</td>
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<tr>
<td>GHG8</td>
<td>The San Diego Foundation Regional Focus 2050 Study</td>
<td>Not Identified</td>
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<td>GHG10</td>
<td>Climate Change Scoping Plan</td>
<td>December 2008</td>
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<td>GHG11</td>
<td>Air Resources Board Resolution 11-27</td>
<td>August 24, 2011</td>
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<td>GHG12</td>
<td>CAPCOA, “CEQA and Climate Change-Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to CEQA”</td>
<td>January 2008</td>
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<td>GHG15</td>
<td>Scoping Plan Measures Implementation Timeline</td>
<td>October 28, 2010</td>
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<td>GHG16</td>
<td>“Addressing Climate Change at the Project Level”</td>
<td>January 6, 2010</td>
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<td>GHG18</td>
<td>Executive Order S-3-05</td>
<td>June 1, 2005</td>
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<td>GHG19</td>
<td>“Local Government’s Role in Responding to Climate Change in California”</td>
<td>May 9, 2009</td>
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**AIR QUALITY**

<table>
<thead>
<tr>
<th>AQ1</th>
<th>American Lung Association State of the Air</th>
<th>2011</th>
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<tbody>
<tr>
<td>AQ2</td>
<td>“The Effect of Air Pollution on Lung Development from 10 to 18 Years of Age” The New England Journal of Medicine</td>
<td>September 9, 2004</td>
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<td>AQ3</td>
<td>Cumulative Impacts: Building a Scientific Foundation</td>
<td>December 2010</td>
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<td>AQ4</td>
<td>The Benefits of Meeting Federal Clean Air Standards in the South Coast and San Joaquin Valley Air Basins</td>
<td>November 2008</td>
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<td>AQ5</td>
<td>“The enhancement of local air pollution by urban CO2 domes”</td>
<td>October 3, 2009</td>
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<td>AQ6</td>
<td>Air Resources Board eight-hour ozone data</td>
<td>July 15, 2003</td>
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<td>AQ7</td>
<td>Map-San Diego 8-hour ozone non-attainment area</td>
<td>Unidentified</td>
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<td>AQ8</td>
<td>Correspondence Letter from Air Resource Board to Laura Yoshii Regarding Recommendations for Area Designations</td>
<td>March 11, 2009</td>
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<td>AQ9</td>
<td>Federal Register-Volume 75 No. 11</td>
<td>January 19, 2010</td>
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<td>AQ10</td>
<td>Fact Sheet: Proposal to Revise the National Ambient Air Quality Standards for Ozone</td>
<td>Not Identified</td>
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<td>AQ11</td>
<td>2011 Area Designations for State Ambient Air Quality Standards</td>
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<td>AQ12</td>
<td>2011 Area Designations for State Ambient Air Quality Standards</td>
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<tr>
<td>AQ13</td>
<td>Area Designations Maps/State and National</td>
<td>October 17, 2011</td>
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</table>
RHNA Process – Development of Draft RHNA

- HCD-SANDAG consultation on RHNA Determination
- HCD RHNA Determination provided - Nov. 2010
- Joint meetings of the Regional Technical Working Group and Regional Housing Working Group held from April 2010 – September 2011
- Presentations made to Regional Planning Committee and Board of Directors
Public Review of Draft RHNA

- Board accepted Draft RHNA in May 2011
- Public workshops/hearings in June 2011
- Comments and responses on Draft RHNA Methodology and Allocation
- Proposed adoption of Final RHNA Plan: October 28, 2011

Consistency with RTP/SCS

- 2050 Regional Growth Forecast is the foundation of the RTP, SCS, and RHNA
- Planned housing in the region accommodates RHNA and projected 2050 population of region
- Based on local jurisdiction plans multifamily housing accounts for more than 80 percent of projected residential growth in the region
Meets RHNA Objectives

- Increasing supply and mix of housing types, tenure, and affordability
- Promoting infill development and socioeconomic equity, protection of environmental and agricultural resources, and encouragement of efficient development patterns
- Promoting jobs/housing balance
- Alleviating overconcentration of lower income households, i.e. promoting balanced communities

Next Steps

- Policy 33 – Board Ad Hoc Subcommittee recommendation to Board anticipated December 2011
Next Steps

- Report on housing element review issues - Winter 2012
- Local housing elements due April 27, 2013

Recommendation

The Board of Directors is asked to conduct a public hearing and approve Resolution No. 2012-10 (Attachment 1), adopting the final Regional Housing Needs Assessment Plan for the 2013 – 2020 (fifth) housing element cycle, in substantially the same form as Attachment 2.
New Housing Units by Income Category
1/1/03 – 12/31/09

2009 RCP Performance Monitoring Report

<table>
<thead>
<tr>
<th>Income Level</th>
<th>Very Low</th>
<th>Low</th>
<th>Moderate</th>
<th>Above Moderate</th>
<th>Total for All Categories</th>
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</thead>
<tbody>
<tr>
<td>Total Housing Units Produced</td>
<td>3,972</td>
<td>4,021</td>
<td>3,512</td>
<td>64,616</td>
<td>76,121</td>
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<td>RHNA Goal</td>
<td>24,143</td>
<td>18,348</td>
<td>20,280</td>
<td>44,530</td>
<td>107,301</td>
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<tr>
<td>Percent of Goal Produced</td>
<td>16%</td>
<td>22%</td>
<td>17%</td>
<td>145%</td>
<td>71%</td>
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<tr>
<td>Units Left To Permit</td>
<td>20,171</td>
<td>14,327</td>
<td>16,768</td>
<td>-20,086</td>
<td>31,180</td>
</tr>
</tbody>
</table>

2010 Household Income Limits
Family of Four

- **Very Low Income**
  0-50 percent AMI - $39,250

- **Low Income**
  50-80 percent AMI - $62,800

- **Moderate Income**
  80-120 percent AMI - $90,600

- **Above Moderate**
  120 percent and above AMI

AMI = Area Median Income
RHNA Allocation Considerations

- Jobs and housing relationship
- Opportunities and constraints to developing housing
  - Lack of sewer/water service capacity
  - Vacant/redevelopment/infill land availability
  - Land protected from development
  - County policies to preserve agricultural land
- Distribution of household growth in RTP and maximizing transportation infrastructure
- Market demand for housing

Ways to Plan for Lower Income RHNA Goals

- Multifamily vacant sites
- Multifamily redevelopment sites
- Rehabilitated/rent restricted units
- Second/accessory units
- Farmworker housing
RHNA Determination
2010 – 2020 RHNA Projection Period

161,980 new housing units (11 years)
- Very Low – 22.5% 36,450 units
- Low – 17.1% 27,700 units
- Moderate – 18.9% 30,610 units
- Above Moderate – 41.5% 67,220 units

Meeting Overconcentration Objective

- 40% of households in region are lower income
- Jurisdictions within 5 percent of the regional percentage of lower income households are not overconcentrated
- Goal to move jurisdictions closer to the regional %
- 15 jurisdictions allocated lower income RHNA of 44 percent
- Two jurisdictions allocated lower income RHNA that moves closer to the regional % - Carlsbad and Poway
Meeting Overconcentration
Objective

- Del Mar and County of San Diego lower income RHNA allocations
- Jurisdictions with overconcentration of lower income households allocated 44 percent lower income RHNA:
  - El Cajon 53 percent → 44 percent
  - Imperial Beach 52 percent → 44 percent
  - Lemon Grove 47 percent → 44 percent
  - National City 61 percent → 44 percent