

Updated Comments and Responses on the Draft San Diego Forward: The Regional Plan

ADDITIONAL COMMENTS AND RESPONSES AVAILABLE AFTER POSTING OCTOBER 9, 2015, BOARD OF DIRECTORS AGENDA (OCTOBER 2, 2015)

No.	Name	Agency	Comment	Response	Source
999	Shirley N. Weber	Assembly, Seventy-Ninth District, California Legislature	<p>An efficient, connected, and affordable transit network can improve quality of life and make San Diego a world -class region that can retain and attract a workforce to make San Diego economically competitive and allow for upward economic mobility.</p> <p>I am aware of the need and desire for a robust public transit network and increased investment in infrastructure that will make biking and walking safer in overburdened communities. I am also aware of public health and environmental concerns regarding the Regional Plan's strategy of adding freeway lanes to increase car capacity, particularly through overburdened communities in the urban core (i.e., SR-94, I-15, I-5, I-805).</p> <p>Despite much of the public comments SANDAG has received in support of public transit and opposition to adding capacity for cars on freeways, there has been little to no movement in reprioritizing money from freeway lane additions to transit and active transportation projects. Freeway lane addition projects in the 2015 Regional Plan are very similar to the freeway project list from the Regional Transportation Plan passed in 2011. State, Federal, and local funding for transportation may be more flexible than SANDAG is allowing it to be in its allocation to each mode-share (i.e., freeway, transit, active transportation).</p> <p>I support the analysis of flexible federal, state, and local funds that could be transitioned from freeway projects to public transit and active transportation projects. I ask that this conversation continue at the SANDAG Transportation Committee and Board and that there is a commitment to complete such an analysis by an independent local and statewide panel of funding experts and local transportation advocates.</p> <p>Most importantly, an implementation plan for the transition of funds must occur. What SANDAG can do in the interim to improve mobility for overburdened communities and further reduce greenhouse gasses are prioritize in the following Regional Plan:</p> <ul style="list-style-type: none"> • Complete all retrofits for safe routes to existing transit and complete all Active Transportation Retrofits for Bicycle/Pedestrian Improvements at Freeway Interchanges by 2025, prioritizing overburdened communities first. • Implement 10-minute all-day frequencies for Urban Core local bus routes, expand bus service for early morning and late night commuters, and increase frequency of transit services on routes where ridership was at or near capacity of the vehicles by 2025. • Eliminate the proposed Plan's investments in highways that add general purpose lanes and managed lanes; instead, consider converting existing general purpose lanes to managed lanes to accommodate Rapid routes and HOV that would operate in new Managed Lanes under the proposed Plan (as is currently being studied in the SR-94 Corridor DEIR). <p>I stand with my constituents who have asked me to support a regional plan that is more aligned with a movement towards the reduction of greenhouse gas emissions and towards ensuring transportation options. I strongly urge you to continue the conversation at the SANDAG Transportation Committee and reconsider an efficient, connected, and affordable public transit network that can improve the quality of life in our overburdened communities.</p>	<p>Thank you for your comments. The Plan recognizes that there is flexibility, albeit limited, in some of the fund sources that the region receives from state and federal sources. The Plan maximizes the use of this flexibility in order to advance and complete the TransNet program of projects that voters approved in 2004. In fulfillment of the promise made to voters, many of the projects in the Ordinance have been completed ahead of where they would have had the region not exercised this flexibility. In fact, eight of the nine transit projects in the Ordinance have already been started, with several, including the Superloop and Rapid services along I-15 and MidCity line to SDSU, already completed. During Fall 2015, SANDAG will begin work on the South Bay Bus Rapid Transit, another TransNet transit project that was accelerated with program-wide use of flexibility. SANDAG will continue to make use of this flexibility to position projects in the TransNet Ordinance, including transit (such as the MidCoast project) and active transportation projects (such as the Inland Rail Trail) to complete them as soon as possible.</p> <p>Retrofit projects to improve bike/pedestrian access to existing transit stops and stations are included in the Unconstrained Network. However, these projects will be considered through the implementation of Mobility Hub projects which are included in the Revenue Constrained Plan.</p> <p>The Regional Plan also prioritizes providing safe access wherever new transit projects are built, as it is more efficient and cost-effective to include safe bike and pedestrian access as new stations are developed, rather than after the project is already on the ground.</p> <p>Regarding increased local bus frequencies, today, buses account for nearly two-thirds of transit ridership and, with this Plan, we will invest even more resources for local route improvements as well as the regional Rapid services. By 2020, existing bus services in the urbanized areas will experience increased frequencies to 15 minutes all day, and by 2035, service will increase to 10 minutes all day. By 2050, we will have 32 new bus Rapid services. Increased transit frequencies were evaluated as part of EIR Alternatives 5C and 5D.</p> <p>In terms of the conversion of General Purpose highway lanes to Managed Lanes; throughout the life of the Plan, Managed Lane improvements have been incorporated on corridors with substantial traffic congestion to support carpools, transit services, and solo drivers who pay a fee (such as in the I-15 corridor). Net revenues from those fees help support transit operations along the corridor. Eliminating highway investments and converting existing general purpose lanes to managed lanes were evaluated as part of EIR Alternatives 5A through 5D. In terms of feasibility of SANDAG obtaining authority from the California Legislature for converting General Purpose Lanes to Managed Lanes, please also see response to comment 1012...</p>	Letter

No.	Name	Agency	Comment	Response	Source
1000	Colin Parent	Circulate San Diego	<p>On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to provide final comments to the Draft 2015 Regional Plan.</p> <p>Transit and active transportation projects are crucial to economic development, reducing greenhouse gas emissions, and providing safe, affordable connections between where people live and where they work and play.</p> <p>Circulate San Diego appreciates the work over the years by the SANDAG Board and staff to develop transportation choices through its Draft 2015 Regional Plan, titled "San Diego Forward." There are many aspects to the Regional Plan that have great merit.</p> <p>Unfortunately, we must recommend that SANDAG Board members vote against adoption of the plan in its current form because it does not adequately advance transit and active transportation projects.</p> <p>Despite these differences, Circulate San Diego believes that the SANDAG Board can and should move forward with a region-wide Quality of Life revenue measure in 2016 that includes provisions and funding to advance transit and active transportation projects.</p> <p>SANDAG's Draft 2015 Regional Plan assumes a Quality of Life measure that generates a 1/4 cent sales tax over a 30 year period. Yet, SANDAG is currently contemplating a 1/2 cent sales tax over a 40 year period—more than twice the Quality of Life revenue contemplated by the Draft 2015 Regional Plan.</p> <p>With additional resources, SANDAG will have substantially more funding flexibility to advance transit and active transportation projects into earlier periods of the region's transportation plan. If the Regional Plan represents what SANDAG is willing to do today, Quality of Life should represent our aspirations for tomorrow.</p> <p>SANDAG should draft the Quality of Life measure to advance some or all of the transit and active transportation projects that advocates have asked to be accelerated in the Regional Plan. Those projects will provide meaningful contributions to the region's transportation plans, and are already priorities for organizations that can be helpful and active in supporting a Quality of Life measure with voters. The projects SANDAG should advance have already been articulated by Circulate San Diego through previous correspondence, and are listed here below:</p> <ul style="list-style-type: none"> • Orange Line Trolley Frequency Enhancements • Blue Line Trolley Frequency Enhancements • Construction of the 562 Trolley line ("The Purple Line") • Rapid 550 Construction • Del Mar Fairgrounds Permanent Seasonal Rail Platform • Safe Routes to Transit Retrofits at Existing Stations • Active Transportation Retrofits at Freeway Interchanges • Enhancing the Smart Growth Incentive Program 	<p>The SANDAG Board of Directors is considering a funding measure that could be placed on a future ballot, but has not made a decision about the timing of such a measure. The TransNet Ordinance requires that the Board of Directors act on an additional regional funding measure to meet the long-term requirements for implementing habitat conservation plans in the San Diego region. In addition, the SANDAG Board of Directors has been considering other regional funding needs that could be included in a potential measure, such as transportation and water related investments. Specific projects and programs have not been decided at this time. Regarding competitive funding programs, San Diego Forward made reasonable assumptions about funding that would be available to the region, consistent with requirements of state and federal transportation planning law.</p>	Letter

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1000 Cont.	Colin Parent	Circulate San Diego	<p>Competitive funding programs such as California’s cap-and-trade system, the Active Transportation Program, TIGER, New Starts, and numerous others, are expected to continue to grow both in overall numbers and in the proportion of funding available to SANDAG for transportation investment. These programs favor regions that focus on smart growth principles. Visionary planning that prioritizes transit and active transportation is critical for maintaining the San Diego region’s competitiveness for securing new funding.</p> <p>The Regional Plan that SANDAG adopts in 2015 will be a living document, subject to amendment and update. It is a continuation, not the end of San Diego’s transportation plans. A Quality of Life measure can instill SANDAG’s regional plans with new energy– and new funding– to improve our region’s transportation network into the future.</p> <p>If SANDAG moves forward with a Quality of Life measure that includes both provisions and funding to advance transit and active transportation, Circulate San Diego will be eager and active in our support.</p> <p>We look forward to continuing to work with SANDAG to promote transportation choices in the region.</p>		Letter
1001	Circulate San Diego and Climate Action Campaign	Circulate San Diego and Climate Action Campaign	<p>A New Climate for Transportation Report Executive Summary</p> <p>The City of San Diego’s proposed Climate Action Plan (CAP) commits the City to change the way people get to work. Not only is transportation important for economic development, lifestyle, and social equity, it is a crucial component to reducing the risks from climate change.</p> <p>The purpose of the CAP is to reduce greenhouse gas emissions (GHGs) in the City of San Diego and to protect our quality of life.</p> <p>One of five key strategies in the CAP is to reduce GHGs from car trips by encouraging more commuters in San Diego to rely on transit, walking, and bicycling in the future. In order for the City of San Diego to meet its climate goals, the City Council and Mayor must:</p> <ol style="list-style-type: none"> 1. Implement a variety of policies, infrastructure projects, and programs at the city level to make non-car transportation choices both safe and easy to use, and 2. Ensure that the San Diego Association of Governments (SANDAG), implements a Regional Plan that provides sufficient resources for transit, walking, and bicycling to meet the City of San Diego’s climate goals. <p>Some of the mobility strategies outlined in the CAP must be implemented at the regional level by SANDAG—not by the City alone. However, San Diego Forward: The Regional Plan, SANDAG’s long range transportation plan, projects transit, walking, and bicycling levels far smaller in the City of San Diego than what is called for by the CAP.</p> <p>The City of San Diego’s climate goals call for 50 percent of commuters living near transit to bicycle, walk, or take transit to work. However, according to SANDAG’s own data, their plans will result in less than 15 percent for those same areas in the City of San Diego.</p> <p>SANDAG’s own projections show that it is mathematically impossible for the City of San Diego to achieve its transit and active transportation goals with the transportation network SANDAG is currently planning.</p> <p>The City of San Diego must use the influence of its SANDAG Board members to ensure the region prioritizes sufficient funding to meet the transit and active transportation goals of the CAP.</p>	<p>The “New Climate for Transportation” report makes several comments about the contents of the City of San Diego’s draft Climate Action Plan (draft CAP) and the relationship between SANDAG’s Regional Plan and the draft CAP (City of San Diego 2015).</p> <p>The report asserts that SANDAG must “implement a Regional Plan that provides resources for transit, walking, and bicycling to meet the City of San Diego’s climate goals” and that “some of the mobility strategies outlined in the CAP must be implemented at the regional level by SANDAG – not by the City alone.” The report also asserts that it is “mathematically impossible for the City of San Diego to achieve its transit and active transportation goals with the transportation network SANDAG is currently planning.” Specifically, the report asserts that SANDAG’s Regional Plan makes it “mathematically impossible” for the City to meet its goal of “50 percent of commuters living near transit to bicycle, walk, or take transit to work.” The report concludes that the “City of San Diego must use the influence of its SANDAG Board members to ensure the region prioritizes sufficient funding to meet the transit and active transportation goals of the (draft) CAP.”</p> <p>As explained below, the Regional Plan does not prevent the City of San Diego from meeting its draft CAP GHG reduction goals, nor does it make it “mathematically impossible” for the City to meet its goals for 50 percent of commuters in Transit Priority Areas to get to work by using transit, walking, or biking. The draft CAP also does not identify mobility strategies that “must be implemented at the regional level by SANDAG – not by the City alone.” Rather than being in conflict, the draft CAP and the Regional Plan are complementary plans that show how the City of San Diego and SANDAG can work together to coordinate local actions and regional investments in ways that increase transit use, walking, and biking and reduce GHG emissions.</p> <p>The draft CAP calls for the following City-specific GHG reductions goals for 2020 (25% below 2010 levels), 2030 (41% below 2010 levels), and 2035 (50% below 2010 levels). It then shows how these targets could be achieved through a combination of federal and state actions, regional actions (i.e., The Regional Plan), and local actions.</p> <p>Federal and state actions. The draft CAP identifies several adopted federal and state laws, plans, and programs that would reduce GHG emissions in the City of San Diego. Most of the reductions in the draft CAP would result from federal and state actions: 90 percent of reductions in 2020, 74 percent of reductions in 2030, and 65 percent of reductions in 2035 (See draft CAP, Figure 2.3).</p> <p>Regional actions. The draft CAP includes GHG reductions from SANDAG’s prior RTP adopted in 2011 under regional actions. The draft CAP shows that the prior RTP’s compliance with SB 375 regional GHG targets from passenger vehicles will help the City of San Diego meet its GHG reduction targets. According to the draft CAP (Table 3.1), the Regional Plan’s passenger vehicle GHG reductions would account for about 9 percent of the reductions needed to meet the City’s 2020 target, about 8 percent of reductions needed to meet the City’s 2030 target, and about 8 percent of reductions needed to meet the City’s 2035 target.</p> <p>However, the draft CAP underestimates passenger vehicle GHG reductions from the current Regional Plan by assuming that the Regional Plan would achieve per capita GHG reductions from passenger vehicles of 7 percent by 2020 and 13 percent by 2035 (see Appendix B, Table 20, p. B-42). In fact, the Regional Plan would achieve reductions of 15 percent by 2020 and 21 percent by 2035, resulting in greater GHG reductions for the City than assumed by the draft CAP, and further supporting the draft CAP’s goals to reduce GHG emissions through local City of San Diego actions that increase use of transit, walking and biking, reduce vehicle fuel consumption, and promote land use patterns that reduce vehicle miles traveled. The Regional Plan’s investments in safe routes to transit improvements for all new transit stations, active transportation retrofits at all new freeway connectors, and safe routes to school would further support the City’s goals for transit, walking, and biking. In addition, the Regional Plan includes investments in electric vehicle charging infrastructure that would further reduce GHG emissions and facilitate the City reaching its goal to reduce vehicle fuel consumption.</p>	Letter

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1001 Cont.		Circulate San Diego and Climate Action Campaign	<p>Introduction</p> <p>The City of San Diego’s proposed Climate Action Plan (CAP) offers a roadmap with specific policy recommendations to address climate change and reduce greenhouse gas emissions (GHGs) citywide.</p> <p>The Climate Action Plan’s Relationship with the City’s General Plan</p> <p>The City of San Diego’s General Plan Conservation Element sets forth broad policies intended to reduce GHG emissions. The CAP takes these policies one step further by outlining strategies and enforceable actions that will achieve GHG reduction targets by certain time frames. Enforceable actions are necessary not only to reduce the GHG emissions of future development under the General Plan, but to also meet the City’s obligations under the California Environmental Quality Act to mitigate cumulatively considerable impacts of activities covered by the General Plan.</p> <p>Similar to a General Plan, the CAP provides broad goals for addressing GHG impacts. The CAP also provides specific strategies the City must implement to reduce GHG emissions. The CAP can be considered an “instruction manual” for the City to identify and implement GHG reduction measures over a period of time. Subsequent to adoption of the CAP, implementation of the strategies will occur through:</p> <ol style="list-style-type: none"> 1. Adopted resolutions (voluntary actions or City programs), 2. Ordinances (mandatory actions that carry the force of law in the City of San Diego), 3. Community plan updates, and 4. Other similar regulatory updates to the City’s Zoning and Building Codes. <p>The Climate Action Plan and Transportation Choices</p> <p>The CAP identifies five core strategies to reduce GHGs, including:</p> <ol style="list-style-type: none"> 1. Energy and Water Efficient Buildings, 2. Clean and Renewable Energy, 3. Bicycling, Walking, Transit, and Land Use, 4. Zero Waste, and 5. Climate Resiliency. <p>One of the five core strategies outlined in the CAP focuses on “Bicycling, Walking, Transit, and Land Use.” This strategy outlines a broad range of activities that aim to reduce vehicle miles traveled (VMT) and improve transportation choices as mechanisms to reduce GHGs. Relevant CAP implementation measures focus on promoting alternative modes of travel to the automobile, locating new development near transit to reduce car commuting, revising parking standards, and managing parking supply over large areas rather than building by building.</p> <p>The CAP’s goals are not to change commuting practices for all San Diegans, but instead are targeted toward commuters living in Transit Priority Areas, locations in the City of San Diego within one-half mile of a rail station stop or a high-quality transit corridor. These are areas where the City of San Diego believes it can have an impact on facilitating non-car commutes, by focusing funding and other policy tools to advance non-car transportation.</p>	<p>Local actions. After identifying how federal and state actions and SANDAG’s Regional Plan will reduce GHG emissions in the City, the draft CAP identifies five “local strategies” that <i>the City will implement to achieve additional GHG reductions</i> (draft CAP, Chapter 3).</p> <ul style="list-style-type: none"> • Strategy 1: Energy & Water Efficient Buildings • Strategy 2: Clean & Renewable Energy • Strategy 3: Bicycling, Walking, Transit, & Land Use • Strategy 4: Zero Waste (Gas & Waste Management) • Strategy 5: Climate Resiliency <p>In Strategy 3, the draft CAP identifies goals to increase use of mass transit, increase commuter walking and bicycling opportunities, reduce vehicle fuel consumption, and promote effective land use to reduce vehicle miles traveled. The draft CAP identifies the following six local actions that will be <i>implemented by the City to achieve the goals, and targets that each action is expected to achieve.</i> It identifies the City departments responsible for implementation, and explains that the City will implement the actions through “a combination of ordinances, City Council policies, resolutions, programs, and incentives, as well as outreach and education activities.” (Draft CAP Chapter 3.)</p> <p>Draft CAP Goals, Actions, and Targets for Strategy 3: Bicycling, Walking, Transit, & Land Use</p> <p>Goal: Increase the use of mass transit.</p> <p>Action 3.1. Implement the General Plan’s Mobility Element and the City of Villages Strategy in Transit Priority Areas to increase the use of transit.</p> <p>Target: Achieve mass transit mode share of 12% by 2020 and 25% by 2035 in Transit Priority Areas.</p> <p>Goal: Implement pedestrian improvements in Transit Priority Areas to increase commuter walking opportunities.</p> <p>Action 3.2. Implement pedestrian improvements in Transit Priority Areas to increase commuter walking opportunities.</p> <p>Target. Achieve walking commuter mode share of 3% by 2020 and 7% by 2035 in Transit Priority Areas.</p> <p>Goal: Increase commuter bicycling opportunities.</p> <p>Action 3.3. Implement the City of San Diego’s Bicycle Master Plan to increase commuter bicycling opportunities.</p> <p>Target: Achieve 6% bicycle commuter mode share by 2020 and 18% mode share by 2035 in Transit Priority Areas.</p> <p>Goal: Reduce vehicle fuel consumption.</p> <p>Action 3.4. Implement a Traffic Signal Master Plan to retime traffic signals to reduce vehicle fuel consumption.</p> <p>Target: Install roundabouts at 15 intersections by 2020 and an additional 20 intersections by 2035.</p> <p>Goal: Reduce vehicle fuel consumption.</p> <p>Action 3.5. Implement a Roundabouts Master Plan to install roundabouts to reduce vehicle fuel consumption.</p> <p>Target: Install roundabouts at 15 intersections by 2020 and an additional 20 intersections by 2035.</p> <p>Goal: Promote effective land use to reduce vehicle miles traveled.</p> <p>Action 3.6. Implement transit-oriented development within Transit Priority Areas.</p> <p>Target: Reduce average vehicle commute distance by two miles through implementation of the General Plan City of Villages Strategy by 2035.</p> <p>Contrary to statements made in Circulate San Diego’s report, the draft CAP does not say that any of these mobility strategies in whole or in part “must be implemented at the regional level by SANDAG – and not by the City alone.” The draft CAP does not say that SANDAG or its Regional Plan needs to provide, “sufficient resources for transit, walking, and bicycling” in order for the City of San Diego to meet its GHG reduction goals or its goal for 50 percent of commuters in Transit Priority Areas to get to work by taking transit, walking, or biking.</p>	

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1001 Cont	Circulate San Diego and Climate Action Campaign	Circulate San Diego and Climate Action Campaign	<p>The CAP commits to expanded multi-modal transportation choices like walking, bicycling, and transit use through the following strategies:</p> <ul style="list-style-type: none"> • <u>Transit: Implement the City's General Plan Mobility Element and the City of Villages Strategy to increase use of transit and achieve mass transit mode-share of 12 percent by 2020 and 25 percent by 2035.</u> • <u>Walking: Implement the City's Pedestrian Master Plan to increase commuter-walking opportunities in Transit Priority Areas and achieve walking commuter mode-share of 3 percent by 2020 and 7 percent by 2035.</u> • <u>Bicycling: Implement the City's Bicycle Master Plan to increase commuter bicycling opportunities in Transit Priority Areas and achieve bicycle commuter mode- share of 6 percent by 2020 and 18 percent by 2035.</u> <p>By 2035, when the CAP's multi-modal transportation targets are to be met, 50 percent of San Diego residents living in Transit Priority Areas will commute using transit, walking, and bicycling.</p> <p><u>The Climate Action Plan Supports Existing and Future City Policies</u></p> <p>The CAP's strategies leverage existing City policies and efforts. For example, the CAP supports the following policies and mobility concepts:</p> <ul style="list-style-type: none"> • <u>Bicycle and Pedestrian Infrastructure: Achieving the CAP goals will require funding pedestrian and bicycle infrastructure already identified in the City's Bicycle and Pedestrian Master Plans.</u> • <u>Complete Streets: The CAP calls for incorporating pedestrian and bicycle facilities in street planning, instead of focusing primarily on cars. This is required by state law as of 2008.</u> • <u>Infill Development: The CAP contemplates new infill development opportunities as community plans are updated. California has made similar efforts to encourage infill with SB 375 and SB 743.</u> • <u>Transit-Oriented Development: The CAP strategies support implementation of transit-oriented development to promote effective land use that will reduce average commute distance.</u> • <u>Parking Reform: The CAP supports development of a "Parking Plan" to include measures such as "unbundled parking" for nonresidential and residential sectors in urban areas.</u> <p>The City of San Diego's Climate Action Plan and SANDAG</p> <p><u>The CAP was drafted to be consistent with SANDAG's Sustainable Communities Strategy (SCS). As a Metropolitan Planning Organization, SANDAG is required by the State of California to prepare an SCS as part of its Regional Transportation Plan, in order to meet certain GHG reduction targets.</u></p> <p><u>The goals of the CAP and SCS are similar—to reduce GHG emissions. The SCS is responsible for demonstrating how regional GHG reduction targets will be met through reductions in VMT from cars and light trucks.</u></p>	<p>Furthermore, the draft CAP does not identify the SANDAG Regional Plan as responsible for achieving the City's goal of "50 percent of commuters living near transit to bicycle, walk, or take transit to work" as asserted by Circulate San Diego; the draft CAP clearly identifies this as a local goal to be achieved through City actions. Finally, the draft CAP contains no analysis or facts supporting Circulate San Diego's claim that the Regional Plan makes attainment of this City goal "mathematically impossible".</p> <p>Rather than being in conflict, the draft CAP and the Regional Plan are complementary plans that show how the City of San Diego and SANDAG can work together to increase transit use, walking, and biking to reduce GHG emissions. The draft CAP shows the importance of coordinating local actions to build pedestrian and bicycle infrastructure, bring about transit-oriented development, and reduce vehicle fuel consumption with regional investments in transit, active transportation, and transportation demand and systems management. While Circulate San Diego correctly points out that the Regional Plan does not meet the City's 50 percent mode share goal by itself, the draft CAP presents a clear roadmap of specific City of San Diego actions that, if adopted, could build on SANDAG's regional actions to meet the City's goals for transit use, walking, and biking, including its goal of having 50 percent of commuters living near transit bicycle, walk, or take transit to work. In fact, Appendix B of the draft CAP, page B-30, describes the assumptions for Action 3.1 related to mass transit use and explains how the City set goals for transit mode share that are greater than what the Regional Plan achieves. Similarly, pages B-32 and B-33 describe the assumptions behind the mode share goals for walking and biking, respectively. For both goals, the City cites its own Pedestrian Master Plan and Bicycle Master Plan as well as consultation with City staff to determine the mode share targets.</p> <p>Lastly, the report does not directly address the contents of the Draft EIR for the Regional Plan. Nevertheless, please see Master Response 3 of EIR Appendix K-1 explaining that the Draft EIR properly concludes that the proposed Plan would not conflict with the currently adopted City CAP, the 2005 City of San Diego Climate Protection Action Plan (City of San Diego 2005). At the time of Draft EIR preparation, the City of San Diego was preparing a new 2015 CAP (which was published in July 2015). However, because the 2015 CAP was still in draft form at the time of EIR preparation and subject to change, it cannot serve as the basis for an EIR consistency determination with an adopted CAP.</p>	

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1001 Cont.		Circulate San Diego and Climate Action Campaign	<p>However, SANDAG cannot implement either its SCS or Regional Transportation Plan in a vacuum. SANDAG’s SCS must be consistent with the land use and transportation planning of its constituent governments.</p> <p>The Climate Action Plan and SANDAG’s Transportation Planning</p> <p>For the CAP to be successful, the City of San Diego must take a two-pronged approach:</p> <ol style="list-style-type: none"> 1. Implement actions and measures over which it has direct control (e.g., implement the City of San Diego’s Pedestrian Master Plan and Bicycle Master Plan), and 2. Ensure that SANDAG implements a Regional Plan that provides sufficient resources for transit, walking, and bicycling to meet the City of San Diego’s climate goals. <p>Some of the mobility strategies outlined in the CAP are to be implemented at the regional level by SANDAG—not by the City. Many of the strategies are also dependent on the City and SANDAG cooperating, communicating, and leveraging resources to effectively implement projects that meet both of their climate reduction requirements. The City of San Diego can and should ensure that SANDAG prioritizes and dedicates sufficient resources to transit and active transportation by using its voting power at the SANDAG Board when updating San Diego’s Regional Transportation Plan.</p> <p>SANDAG’s Plans are Insufficient</p> <p>SANDAG’s current transportation planning is a barrier to the City of San Diego achieving the mode-share goals of the CAP. SANDAG is currently updating its 2011 Regional Transportation Plan with a 2015 Regional Plan, titled “San Diego Forward.” The Regional Plan outlines a variety of transportation projects for the region, and the cost and phasing of their construction.</p> <p>While the CAP calls for transit, bicycling, and walking to represent 50 percent of commuting trips in 2035 for Transit Priority Areas in the City of San Diego, SANDAG’s transportation plan projects much smaller improvements for transit, bicycling, and walking mode-share.</p> <p>Based on the Draft 2015 Regional Plan, SANDAG prepared a transportation model that analyzed projected mode-shares for walking, bicycling, and transit ridership on a region-wide basis. Through a public records request, Circulate San Diego received more specific projections on mode-share for walking, bicycling, and transit ridership expected by SANDAG to occur within the City of San Diego’s Transit Priority Areas. That data shows SANDAG’s transportation plans are expected to produce improvements to mode- share that are far smaller than the goals of the CAP.</p> <p>In the table below, the stark contrast is evident between necessary changes in transit and active transportation to reach the City’s GHG goals, versus what SANDAG expects to be the outcome from its transportation plans for the same Transit Priority Areas.</p>		

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1001 Cont.		Circulate San Diego and Climate Action Campaign	<p>The City of San Diego’s climate goals call for 50 percent of commuters living near transit in 2035 to bicycle, walk, or take transit to work. However, SANDAG’s plans will result in less than 15 percent. Even as soon as 2020, the Climate Action Plan requires the City to meet 12 percent transit ridership, while SANDAG is projected to result in only 6.8 percent.</p> <p>SANDAG is planning for a transportation network that will result in extremely small increases for transit, walking, and bicycling by 2035. Yet for the CAP to be successful, those travel modes must increase by about 500 percent from their current state. SANDAG’s own projections show that it is mathematically impossible for the City of San Diego to achieve its mode-share goals with the transportation network SANDAG is planning.</p> <p>The City of San Diego Must Lead at SANDAG</p> <p>In order for the City of San Diego to achieve its mode- share goals from the CAP, SANDAG must build a transportation network to facilitate more transit, walking, and bicycling.</p> <p>SANDAG’s transportation plans can be improved, and can help the City of San Diego to achieve its CAP goals by advancing transit, walking, and bicycling projects into earlier periods.</p> <p>SANDAG’s complicated voting system awards the City of San Diego 40 out of 100 weighted votes, and two individual representatives—traditionally the Mayor and a councilmember—to sit on SANDAG’s Board of Directors. Only the County of San Diego has as many individual votes, but no jurisdiction—including the County—has as much of a weighted vote as the City of San Diego.</p> <p>While that voting power alone is not enough to dictate SANDAG’s actions, the City of San Diego has the largest say of any jurisdiction in the region for what transportation plans SANDAG adopts. The City of San Diego is the most influential force at SANDAG, and has the power to shift priorities for the region.</p> <p>Recently, Circulate San Diego and TransForm released a report titled “TransNet Today,” which identifies a variety of options for how SANDAG can advance funding for transit, bicycling, and walking, with SANDAG’s current authority and available funding. The City of San Diego should work with SANDAG Board members and staff to ensure that SANDAG adopts and implements a transportation plan that can help the City of San Diego achieve its climate goals.</p> <p>The City of San Diego will have multiple opportunities to influence SANDAG to adopt a more successful transportation plan. SANDAG updates its regional transportation plans every four years, meaning another update is due in 2019. SANDAG is currently contemplating a regional revenue measure to fund transportation, habitat, and infrastructure. The City of San Diego can ensure that sufficient funds are included in such a measure to achieve the mode-share goals of the Climate Action Plan.</p>		

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1001 Cont.		Circulate San Diego and Climate Action Campaign	<p>Conclusion</p> <p>The climate goals for the City of San Diego in its Climate Action Plan are ambitious, but achievable. City leaders must take action today to reduce greenhouse gas emissions and secure our City's future.</p> <p>Not only must the City of San Diego adopt a variety of policies at the City level and invest the necessary resources into infrastructure improvements, but the City's current representatives to SANDAG, Mayor Kevin Faulconer and Council Member Todd Gloria, must ensure that the region dedicates sufficient funding for transit, bicycling, and walking. Future SANDAG representatives from the City of San Diego must also stay vigilant, to ensure that the Climate Action Plan goals are met.</p> <p>While the City of San Diego can and should implement policies to improve transportation using its own authorities, SANDAG must also play a part. SANDAG must meet the City of San Diego half way.</p> <p>For the CAP to succeed, the City of San Diego must show leadership at SANDAG, and ensure that our region's transportation efforts are up to the task of addressing climate change in San Diego.</p>		
1002	Sherri Lightner	City of San Diego, City Council	<p>There continues to be a need for a regional plan that prioritizes transit before highway expansion, increases active transportation and connects transit to the northern areas of San Diego. I brought forward the Transit First Resolution (R-306886) passed by the San Diego City Council in 2011 (see attached) which stated that the Regional Transportation Plan should prioritize mass transit infrastructure and sustainable transportation projects over highway expansion.</p> <p>For decades, our region has over-invested in highways while under-investing in transit. Consequently, the region has an extensive highway system but a limited transit network that does not serve all San Diego residents. As the representative for District 1, I respectfully request that SANDAG include more transit connectivity to northern communities such as Carmel Valley and Torrey Pines Mesa and more East/West connectivity in the SR-56 corridor in the Regional Plan. Additionally, SANDAG should commit to funding retrofits for safe routes to existing transit stations.</p> <p>This item is scheduled to be heard before the City has adopted its new Climate Action Plan (CAP). The City is moving forward with the adoption of the CAP and at a minimum, we expect, as the largest city in the region, to see our CAP transportation goals incorporated into the Regional Plan. I am concerned that without adequate resources from SANDAG, the City will not be able to achieve the CAP goal of 12% transit mode share by 2020. Given the short timeline to 2020, I respectfully request the SANDAG Board allow for a timely amendment to the proposed Regional Plan to support the implementation of the City's Climate Action Plan, which is scheduled to be heard by the City Council in late 2015. The CAP's implementation should not be stalled because SANDAG's Regional Plan does not include the resources needed to achieve the City's near term transportation goals.</p> <p>A priority of the Plan should be to assure implementation of the various climate action plans within SANDAG's jurisdiction. As CAPs are adopted, the Plan should be modified to reflect the goals and timelines of each, and infrastructure funding should, as much as possible, be prioritized for timely implementation of the various CAPs throughout our region.</p> <p>Please let me know if my office or I can be of any assistance in incorporating the CAP goals into the regional plan.</p>	<p>The Regional Plan dedicates half of its projected expenditures to transit, a larger investment than any previous RTP.. The Regional Plan creates a wide range of transportation choices to driving alone, including increased transit services, carpooling/vanpooling, bicycling, and walking. In many cases, the specific projects included in the Regional Plan are aimed at accommodating multiple transportation modes, including pedestrian, bicycle, and transit. For example, new trolley lines include the development of "mobility hubs" that enable a wide range of options for accessing station sites such as bike lockers, carshare and bike share services, and shuttle services. Managed Lanes facilities provide priority access for Rapid transit services and carpool/vanpooling, giving users a congestion-free bypass of congested main lanes.</p> <p>The Regional Plan contains a rich network of both new Trolley and Rapid lines, and creates network of 10-minute all day service on existing Trolley, Rapid, and local bus services in urban areas. Transit, therefore, will be a key element in meeting our future mobility needs. Retrofit projects to improve bike/pedestrian access to existing transit stops and stations are included in the Unconstrained Network. However, these projects will be considered through the implementation of Mobility Hub projects which are included in the Revenue Constrained Plan.</p> <p>For the Carmel Valley area, the transit improvements would include a new Rapid service connecting the north coastal cities with University City via Carmel Valley via University City and Sorrento Valley. The area along the SR 56 corridor would be served by Rapid 103 connecting Solana Beach with Sabre Springs via Carmel Valley.</p> <p>The Regional Plan does not prevent the City of San Diego from meeting the GHG reduction goals it may eventually adopt that are now in its draft CAP . Rather than being in conflict, the draft CAP and the Regional Plan are complementary plans that show how the City of San Diego and SANDAG can work together to coordinate local actions and regional investments in ways that increase transit use, walking, and biking and reduce GHG emissions. Please see the response to Comment 1001.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1003		Cleveland National Forest Foundation	<p>We submit this letter on behalf of the Cleveland National Forest Foundation ("CNFF") to provide comments on the draft 2015 Regional Transportation Plan/Sustainable Communities Strategy ("2015 RTP/SCS" or "Plan") and the accompanying environmental impact report ("EIR"). As SANDAG is well aware, CNFF commented extensively on the prior plan – the 2050 RTP/SCS – because the organization had grave concerns that the Plan’s auto-centric approach to transportation would set the region on a course that is inconsistent with the State’s climate change goals. Instead of reducing automobile travel, that Plan would have increased vehicle miles traveled ("VMT") by 50 percent between 2010 and 2050. Because the 2050 RTP did not prioritize transit over highways, it was incapable of reducing greenhouse gas ("GHG") emissions over the life of the Plan. These concerns were echoed by numerous other environmental organizations, the California Attorney General and ultimately by California courts.</p> <p>Rather than take heed of these valid criticisms, and diligently work to improve its Plan, SANDAG’s current draft Plan proposes to keep every single roadway project that was included in the 2050 RTP/SCS. Making matters worse, the draft 2015 Plan includes even less funding for transit than the prior RTP. Not surprisingly, if implemented, the proposed 2015 RTP/SCS would once again result in VMT that is far too high to be compatible with California’s climate change goals.</p> <p>Recognizing the magnitude of change the region must undertake to achieve the state’s climate change goals, the 2015 RTP/SCS EIR includes alternatives that would significantly reduce VMT and GHG emissions. Yet rather than seriously consider even one of these environmentally superior alternatives, the EIR finds that each one is infeasible. We cannot help but conclude that SANDAG continues to view SB 375 as a mere bureaucratic hurdle and has very little interest in making the changes necessary to stave off dangerous climate change.</p> <p>Adoption of the RTP/SCS and certification of the EIR would not just constitute bad planning; it would violate state law. The EIR for the 2015 RTP/SCS does correct several deficiencies contained in the EIR for the 2050 RTP/SCS, as requested in CNFF’s lawsuit against the prior EIR and as required by the Court of Appeal. However, our review of the EIR reveals serious new violations of the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq., and CEQA Guidelines ("Guidelines"), California Code of Regulations, title 14 section 15000 et seq. For the reasons set forth below and in the attached report prepared by Smart Mobility Inc., we request that SANDAG substantively revise its RTP/SCS and prepare an EIR that complies with CEQA and the CEQA Guidelines.</p>	<p>Please note that this comment letter was received on October 1, 2015, well after the close of the public review periods for the Draft Regional Plan and Draft EIR.</p> <p>The Regional Plan is based on the concept of creating a wide range of transportation choices to driving alone, including increased transit services, carpooling/vanpooling, bicycling, and walking. In many cases, the specific projects included in the Regional Plan are aimed at accommodating multiple alternatives. For example, a new trolley line would include the development of "mobility hubs" that enable a wide range of options for accessing station sites such as bike lockers, carshare and bike share services, and shuttle services. Managed Lanes provide priority access for Rapid transit services and carpool/vanpooling, giving users a congestion-free bypass of congested main lanes. The Regional Plan contains a rich network of both new trolley and Rapid lines, and creation of a network of 10-minute all day service on existing trolley, Rapid, and local bus services in urban areas. Transit, therefore, will be a key element in meeting our future mobility needs along with other projects that will create a wide range of time-competitive and convenient alternatives to driving alone. The assertion that the Regional Plan includes less funding for transit than the 2050 RTP is incorrect when considering the periods covered by each plan. It’s possible that the commenter did a direct comparison of transit investments in both plans without taking into account that the 2050 RTP covered the period 2010 to 2050 while the Regional Plan covers fewer years (2014 to 2050). Several Rapid services began operations since the 2050 RTP was adopted and are no longer included in the Regional Plan, including the Mid-City Rapid, Rapid services from Escondido to downtown San Diego and to UTC/UCSD, and SuperLoop. Completed double-tracked segments of the COASTER rail corridor also are not included in the Regional Plan.</p> <p>In comparison to the 2050 RTP, the Regional Plan advances several transit projects while delaying several highway investments. For example, the Regional Plan advances completion of a major new Trolley line (Route 562) from San Ysidro to Kearny Mesa 15 years earlier than the 2050 RTP, and also advances service improvements on the SPRINTER rail corridor 5 years earlier than the 2050 RTP. In addition, the Regional Plan includes seven new transit projects that were not included in the 2050 RTP, and the Regional Plan also delays the completion of about 18 highway and managed lane projects to later years of the Regional Plan compared to the 2050 RTP.</p> <p>The Plan shows a reduction in VMT per capita through the development of a transportation network that offers more choices and through implementation of land use decisions that have been made by the cities and county to develop in a more compact way near existing and planned transit services. Total VMT is projected to increase due to the forecasted population growth of nearly one million residents and a half million new jobs by 2050.</p> <p>AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 required that ARB develop a Scoping Plan presenting the main strategies California will implement to reduce statewide GHG emissions to 1990 levels by 2020. ARB approved the initial Scoping Plan in 2008, and approved the first update to the Scoping Plan in 2014. The update concludes that California is on track to meet the 2020 GHG limit and is well positioned to maintain and continue reductions beyond 2020. While the update discusses setting a mid-term target between 2020 and 2050, it does not recommend any numeric post-2020 targets. Senate Bill 375 provides for a planning process to coordinate land use planning and RTPs to help California meet the GHG reductions established in AB 32. SB 375 requires RTPs prepared by MPOs, including SANDAG, to incorporate an SCS in their RTPs that demonstrates how the region would achieve GHG emission reduction targets set by ARB. On September 23, 2010, ARB adopted regional targets for major MPOs. SANDAG’s current targets are per capita CO2 emission reductions from passenger vehicles of 7 percent by 2020 and 13 percent by 2035 relative to 2005 levels, and the proposed Plan meets and exceeds these targets.</p> <p>The EIR meets CEQA requirements. It evaluates in detail seven potentially feasible alternatives specifically designed to reduce VMT and GHG emissions. The SANDAG Board of Directors will make final decisions about the feasibility of these alternatives when it considers adopting CEQA findings. The Court of Appeal decision mentioned in the comment has been depublished, and the California Supreme Court is currently reviewing the adequacy of the EIR prepared for the prior 2050 RTP/SCS.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1004	Cleveland National Forest Foundation	Cleveland National Forest Foundation	<p><u>I. The 2015 RTP/SCS Takes the Region in a Dangerous Direction Environmentally.</u></p> <p><u>Metropolitan planning organizations (“MPO”) around the state are using SB 375 and their RTP/SCSs to explore a variety of transportation scenarios that will, together with land use strategies, enable their regions to achieve their GHG reduction goals. Southern California Association of Governments (“SCAG’s”) approach to its forthcoming RTP/SCS, for example, is to define the region’s transportation needs, evaluate transportation funding trade-offs, and then assess how various transportation network scenarios achieve performance targets. Based on stakeholder and public input, SCAG will then adopt a preferred transportation scenario. The Metropolitan Transportation Commission (“MTC”) is also planning substantive changes for transportation in the Bay Area. It has set a goal of increasing non-auto mode share by 10 percent and decreasing automobile VMT per capita by 10 percent. See Plan Bay Area 2040 – Project Update, Call for Projects and Needs Assessment Guidance – Performance Targets, April 29, 2015, attached as Exhibit 2.</u></p> <p><u>In marked contrast to these thoughtful approaches to regional transportation – approaches specifically contemplated by SB 375 – SANDAG has proposed the identical roadway network that it has endorsed since at least 2007. This “business as usual” approach to meeting the region’s transportation needs makes a mockery of SB 375 and takes the region in a dangerous direction. By not making every effort to explore transportation scenarios that dramatically reduce VMT, SANDAG’s Plan will dig an even deeper GHG emissions hole, making compliance with state GHG goals nothing more than an illusory promise. As the following figure clearly shows, there is a tremendous gap between the RTP’s forecasted GHG emission levels and the California emissions target.</u></p> <p><u>The San Diego region, like every other region in California, is at a critical juncture. Local jurisdictions are looking to SANDAG to lead the region in a sustainable direction and certainly not to be an obstacle to their progress. The City of San Diego, for example, has set an ambitious goal in its climate action plan to cut GHG emissions in half by 2035, in part by getting people who live near high-quality transit stations to walk, bike or take transit to work. See “New Climate For Transportation: How the City of San Diego and SANDAG Must Improve Transportation to Meet Climate Goals,” Climate Action Committee” attached as Exhibit 3. Yet, according to the Climate Action Campaign, “[i]t is mathematically impossible for the city of San Diego to achieve its transit and active transportation goals with the transportation network SANDAG is currently planning.” Indeed, “[t]he RTP/SCS projects transit, walking and bicycling levels far smaller in the city of San Diego than what is called for in the City’s climate action plan.” Id. See also, “City’s Bold Action Plan Could Be Nullified Before it Even Passes,” A. Keatts, Voice of San Diego, September 23, 2015, attached as Exhibit 4.</u></p> <p><u>San Diego County has also committed to substantially reduce GHG emissions consistent with the Executive Order S-3-05 trajectory. See <i>Sierra Club v. County of San Diego</i> (2014) 231 Cal.App.4th 1152. Thus, the only way that the City and County of San Diego, along with many other local jurisdictions, will be able to achieve their goals is if SANDAG focuses the vast majority of the region’s funding on transit and active transportation.</u></p>	<p><u>Both SANDAG and SCAG follow a very similar approach for selecting the preferred revenue constrained network scenario to include in the Regional Plan. First, SANDAG defined the transportation needs through 2050 in its Unconstrained Transportation Network (Fall 2013), projects were ranked using Board-approved evaluation criteria (Spring 2014), transportation network scenarios were developed assessing funding trade-offs and applying Board-approved network performance measures (Spring/Summer 2014), and the Board selected the preferred revenue constrained network after receiving and considering stakeholder and public input (Summer 2014).</u></p> <p><u>MTC also follows a similar approach. The MTC Board has set numeric goals for some metrics. The SANDAG process compared the results of the performance measures for the various transportation networks scenarios with a base year 2012 and with No Build scenarios.</u></p> <p><u>In comparison to the 2050 RTP, the Regional Plan advances several transit projects while delaying several highway investments. For example, the Regional Plan advances completion of a major new Trolley line (Route 562) from San Ysidro to Kearny Mesa 15 years earlier than the 2050 RTP, and also advances service improvements on the SPRINTER rail corridor 5 years earlier than the 2050 RTP. In addition, the Regional Plan includes seven new transit projects that were not included in the 2050 RTP, and the Regional Plan also delays the completion of about 18 highway and managed lane projects to later years of the Regional Plan compared to the 2050 RTP.</u></p> <p><u>Regarding GHG targets, the only mandated greenhouse gas (GHG) emission targets applicable to SANDAG are the SB 375 per capita GHG emissions reduction targets for passenger vehicles. The proposed Plan exceeds these targets. The Draft EIR (Impact GHG-2) demonstrates that the proposed Plan would not conflict with the State’s ability to achieve the AB 32 target of reducing statewide GHG emissions to the 1990 levels by 2020. Although the EIR compares the proposed Plan’s GHG reductions to 2030 and 2050 regional reference points based on Executive Orders B-30-15 and S-3-05, there is no mandate for the proposed Plan to “comply” with the EOs’ state GHG reduction goals.</u></p> <p><u>Referenced Figure D.1 shows the GHG emissions levels without current state policy for fuel efficiency standards and zero emission vehicles (ZEVs), as required by SB 375, then shows the GHG emissions levels with the inclusion of state regulations for fuel efficiency of vehicles and deployment of ZEVs, which currently go out to the year 2025. The figure shows scenario options for further reducing GHG emissions by either additional ZEVs on the road or additional VMT reduction in order to reach the state’s 2050 emissions goal.</u></p> <p><u>The letter asserts that the only way that the City, County, and other jurisdictions will achieve their GHG reduction goals is if SANDAG focuses the vast majority of the region’s funding on transit and active transportation. It also asserts that because the Plan is not on a trajectory to meet 2050 GHG goals, it is inconsistent with the City’s draft Climate Action Plan and the County General Plan, and that these inconsistencies constitute significant impacts under CEQA.</u></p> <p><u>This comment is incorrect for several reasons. First, the Draft EIR’s transportation and GHG impact analyses clearly demonstrate that large future GHG emissions reductions can be achieved without proportionate reductions in VMT achieved by increased transit and active transportation investments. Also, SANDAG alternatives modeling shows that increased transit and active transportation investments alone cannot achieve substantial reductions in total VMT. (See Final EIR Master Responses 1 and 4.) The EIR alternatives were developed specifically to explore land use and transportation scenarios intended to reduce VMT and GHG emissions.</u></p> <p><u>Also, as EIR Master Response 3 demonstrates, the Regional Plan is consistent with adopted local GHG reduction plans and policies, including those of San Diego City and County. Regarding the City of San Diego, the Regional Plan would not conflict with the currently adopted City CAP, adopted in 2005. The City is currently preparing an updated CAP, but it has not been adopted. To guide preparation of the updated CAP, the City adopted Resolution 309230 directing that “the CAP reduce citywide GHG emissions by 15% below the baseline amount by 2020 and by 49% below the baseline by 2035;” however, this resolution does not adopt these GHG reduction goals as official City policy independent of the CAP.</u></p> <p><u>Regarding the County of San Diego, the County is also currently preparing a new CAP. There are no officially adopted County GHG reduction plans or policies in the County General Plan or County General Plan EIR committing the County to reducing GHG emissions consistent with the Executive Order S-3-05 trajectory. Similarly, there is nothing in the County General Plan’s adopted Mitigation Monitoring and Reporting Program (MMRP) committing the County to reducing GHG emissions consistent with the Executive Order S-3-05 trajectory. Rather, the County General Plan and EIR focus on GHG reductions for the year 2020 consistent with AB 32.</u></p> <p><u>The Regional Plan supports the goals for GHG reduction included in the City of San Diego’s Draft Climate Action Plan (CAP). In fact, this Regional Plan achieves greater SB 375 reductions than what is currently accounted for in the draft CAP. SANDAG works closely with the City of San Diego and other jurisdictions as they develop and implement their CAPs. Please see the response to comment (1001) responding to the issues raised in the “New Climate for Transportation” report published by Circulate San Diego and Climate Action Campaign and cited in this letter.</u></p>	Letter

No.	Name	Agency	Comment	Response	Source
1005		Cleveland National Forest Foundation	<p>A. A Plan that Expands Highway Capacity Has No Place in the Region's Future.</p> <p>Numerous factors have combined over the last decade to eliminate the need for additional highway capacity. First, the region's jurisdictions have changed their land use plans significantly, resulting in development patterns that concentrate future growth in urbanized areas, reduce sprawl, and preserve more land for open space and natural habitats. As the RTP/SCS explains, "our region has made great strides in planning for more compact, higher density, and walkable developments situated near transit and in the incorporated areas of the region." RTP at 34. We have entered an era when Americans simply prefer to drive less. Baby boomers are getting older and driving less; millennials are less interested in driving; and there is a trend toward living near urban areas. See "Five Reasons Why Peak Driving is Here to Stay," August 25, 2014, Irvin Dawid, Planetizen, attached as Exhibit 5. Largely as a result of these changed land use and travel patterns, regional VMT has leveled off. As the Smart Mobility Report explains, in the eight years since SANDAG published its 2007 RTP, VMT has decreased in most of the United States including the San Diego region. See Smart Mobility's Comments on RTP/SCS and EIR ("Smart Mobility Report") at 2, attached as Exhibit 6.</p> <p>Looking forward, changes in vehicle technology will further reduce the need for additional highway capacity. As the RTP/SCS itself acknowledges, "by 2025, driverless cars are expected to begin replacing conventional cars. Autonomous vehicle technologies will transform public transit as well, increasing efficiency and accessibility while reducing congestion." 2015 RTP/SCS at 68. According to Smart Mobility, it is estimated that driverless cars – together with the crash avoidance systems and vehicle-to- vehicle communication that will accompany such cars – will increase roadway capacity by 273 percent. Smart Mobility Report at 7.</p>	<p>The Regional Plan multimodal strategy is to focus on a system of Managed Lanes that give priority access to transit, carpools, vanpools, motorcycles, and certain clean-air vehicles at no cost. Solo drivers are provided the opportunity to utilize Express Lanes, but must pay a fee to do so. This fee, in turn, is reinvested to support transit services along the same corridor.</p> <p>With the exception of State Route 11, the Regional Plan does not propose any new freeways. Highway improvements (including highway lanes, freeway connectors, and operational improvements) complement and complete the existing highway network, increasing the efficiency of the regional transportation system.</p> <p>Regarding VMT, SANDAG transportation modeling specifically considered the trends mentioned in the comment. The Plan shows a reduction in VMT per capita through the development of a transportation network that offers more choices and through implementation of land use decisions that have been made by the cities and county to develop mostly within their existing boundaries. It should be noted, however, that total VMT increases as a result of projected population growth with the addition of about a million new people and a half million new jobs by 2050. San Diego Forward takes the regional perspective to develop a system of transportation projects that meet the diverse mobility needs of the region by providing a wide range of choices in how we travel.</p> <p>In terms for the preparation for new technologies, the Plan includes various Transportation Systems Management features that maximize the overall efficiency of the transportation network. By 2025, driverless cars are expected to start replacing conventional cars, which will have impacts on the capacity of the freeways and managed lanes. From 2035 onward, it is projected that a significant percentage of the regional fleet will be described as "autonomous." Thus, vehicle technology changes have been accounted for in the Plan.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1006		Cleveland National Forest Foundation	<p>We can find no logical explanation as to why SANDAG stubbornly refuses to abandon its mid-twentieth century approach to transportation. Even agencies that have traditionally been auto-centric are moving toward multi-modal forms of transportation. Caltrans recently drafted a new mission and vision statement, along with goals and objectives, that take into account per capita VMT and multimodal system integration. Consistent with its new vision, Caltrans has endorsed livable, multimodal street design that supports bicycles and pedestrians as well as automobiles.</p> <p>See "A Follow-Up to The California Department of Transportation: State Smart Transportation Initiative ("SSTI") Assessment and Recommendations," SSTI, December 2014, at 3, 4, attached as Exhibit 7.</p> <p>Similarly, Los Angeles is making every attempt to become America's next great mass-transit city. Thanks to a visionary mayor, Los Angeles has chosen a bold path to invest in the kind of infrastructure that supports continued population growth, and to transform the built environment to match the new infrastructure. See "L.A.'s Transit Revolution", Matthew Yglesias, Slate, September 17, 2012, attached as Exhibit 8. Mr. Yglesias explains, Los Angeles continues, like almost all American cities, to be primarily automobile oriented. But the policy shift is having a real impact on the ground. The most recent American Community Survey showed a 10.7 percent increase in the share of the metro area's population that relies on mass transit to get to work, matched with a 3.6 percent increase in driving. And that's before several of the key Metro projects have been completed or the waning of the recession can drive new transit-oriented development. Id.</p> <p>The actions that Caltrans and Los Angeles are taking demonstrate that it is long past time to change the way we travel in California. Notably, it took a scathing report on Caltrans to move that agency in a sustainable direction. In 2014, the SSTI wrote,</p> <p>Caltrans today is significantly out of step with best practice in the transportation field and with the state of California's policy expectations. It is in need of modernization—both in the way it sees its job and how it approaches that job—and of a culture change that will foster needed adaptation and innovation. Caltrans is in need of both modernization and organizational culture change. See Exhibit 7 at iv [SSTI Report].</p> <p>Unfortunately, this same criticism could describe SANDAG's current approach to transportation. Ironically, while Caltrans is making significant strides to meet California's policy around sustainable goals, SANDAG has yet to markedly change its auto-centric attitude. SANDAG is in need of both modernization and organizational culture change.</p>	<p>The Plan is a considerable departure from RTPs produced even ten years ago in terms of its focus on a multi-modal solution to improving mobility. The Plan includes several new trolley lines, a system of freeway and arterial Rapid services, and creating an urban system of 10-minute all day service on existing rail and bus services. Over the past 30 years, the region's transit system has expanded considerably, including the addition of the Trolley system, the COASTER, the SPRINTER, the Bus Rapid Transit and Rapid system, and more local bus services than ever before. Along with improved transit, increasing car/vanpooling is equally as important, especially for areas that are less conducive for transit investment. Yes, this does mean the creation of a system of Managed Lanes facilities, but these facilities are designed specifically as priority lanes for freeway Rapid and car/vanpools, not single occupant vehicles. Considerable funding has also been designated for a regional network of bicycle facilities and improvements to the pedestrian environment. In fact, nearly 75 percent of the regional investments in the first 5 years of the Plan are dedicated to transit and active transportation projects, including, but not limited to the Mid-Coast Trolley line, double tracking along the coast, the Mid-City centerline transit project, and the South Bay BRT.</p> <p>The Regional Plan is consistent with Caltrans goals and also takes into account per capita VMT and multimodal system integration. Caltrans has been, and will continue to be, an active partner in this multi-modal approach. Local jurisdictions in the San Diego region also have been taking steps to support transit and active transportation investments through their land use decisions as they update their General and Community Plans. Through the \$50 million invested since 2008 to date in the Smart Growth Incentive Program and the Active Transportation Grant Program in more than 100 projects throughout the region, we are beginning to see catalytic projects that are inspiring other smart growth and active transportation projects in localities throughout the region, reinforcing the move toward greater multi-modal planning. This is coupled with local complete streets policies adopted by local jurisdictions, as well as the Regional Complete Streets Policy that is part of the Regional Plan (Appendix U.2) and the Regional Transit Oriented Development Strategy (Appendix U.4, also part of the Regional Plan) to provide a foundation for our region's 3-4 million residents. The City of Los Angeles, a city of approximately 4 million people within the greater metropolitan area of 12 million people, relies heavily on three 1/2 cents sales tax measures (Prop A passed in 1980, Prop C passed in 1990, and Measure R passed in 2008), as well as recent fare increases, to build and operate its transit system. A follow-up funding measure (Measure J) failed, and the City (through Metro) is considering an additional measure in 2016 (Measure R2) to continue to raise more funding for additional transit investments within the City. The SANDAG Regional Plan is required by federal and state transportation planning law to be revenue constrained; as a result, the region needs to continue to identify and secure additional revenue sources in order to continue to move toward greater implementation of multi-modal projects. Within the Plan, SANDAG has included significant additional transit projects based on projected revenues from additional revenue sources. One of these sources is a sales tax measure similar to the Los Angeles measures the commenter has referenced. Although the number and scale of transit projects in the Plan is smaller due to the smaller population and anticipated revenues for this region compared to Los Angeles, the Plan does demonstrate a forward-looking multi-modal versus auto-centric approach.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1007		Cleveland National Forest Foundation	<p>Perhaps one of the best examples of SANDAG's failure to embrace a sustainable transportation future is "Destination Lindbergh." Included in the 2050 RTP/SCS, Destination Lindbergh was a comprehensive planning process designed to improve intermodal access to the Airport. See 2050 RTP Destination Lindbergh, SANDAG attached as Exhibit 9. See also, Destination Lindbergh Power Point, attached as Exhibit 10.</p> <p>Destination Lindbergh began in 2008, when SANDAG along with the City of San Diego and the Airport Authority undertook an exhaustive two year study to determine local and long-distance intermodal transit needs and specifically evaluated the feasibility of the Airport serving as a regional transportation hub. Destination Lindbergh at 1. The study determined that up to 20 percent transit mode share could serve passengers to the Airport. Destination Lindbergh Power Point at 4. The study was included as an appendix to the 2050 RTP yet inexplicably none of the transit-related projects are included in the current RTP's constrained project list. Instead, while SANDAG has failed to capitalize on this critical transit opportunity, the Airport Authority has begun construction of a 1,700-space parking garage which SANDAG is serving with freeway and road access.</p> <p>It is abundantly clear that implementation of Destination Lindbergh would have advanced the goals of both the Urban Area Transit Strategy ("UATS") and the City of San Diego's climate action plan and therefore should have been included as an essential part of the 2015 RTP/SCS.</p>	<p>Decisions about airport facilities, including terminal locations and parking structures are the purview of the San Diego County Regional Airport Authority, not SANDAG.</p> <p>In terms of ground access plans, the proposed Airport Intermodal Transportation Center (ITC) that came out of the Destination Lindbergh study is included in the Regional Plan This ITC facility is aimed at providing access to the airport for trolley, local bus/Rapid routes, Coaster, Amtrak, and the future state High Speed Rail system. Its proposed function as an intermodal facility and the types of transit services that would use it has not changed from the 2050 RTP/SCS.</p>	Letter
1008		Cleveland National Forest Foundation	<p>B. There Continues To Be a Disturbing Disconnect Between SANDAG's Words and Its Actions.</p> <p>A cursory review of SANDAG's 2015 RTP/SCS suggests the optimistic conclusion that the agency is on the right track. Initially, the Plan's EIR explains that the RTP's transit investments were guided by its UATS. DEIR at 2-14. According to SANDAG, "the overarching goal of the UATS was to create a world-class transit system for the San Diego region in 2050, with the aim of significantly increasing the attractiveness of transit, walking, and biking in the most urbanized areas of the region." See 2015 RTP/SCS Technical Appendix U-17. The 2015 RTP/SCS also reports good news as regards land use. As discussed previously, the document now clearly acknowledges that local jurisdictions are concentrating growth in urbanized areas, reducing sprawl, and preserving open space and natural habitat. RTP/SCS at 30. The RTP/SCS explains.</p> <p>These were seismic shifts in thinking about how to grow, and with them came new perspectives about how our region should invest in public transit, roads and highways, and other transportation infrastructure. It was becoming clear that people needed more options for getting around than just the car. Id.</p> <p>The reality of the 2015 RTP/SCS paints a decidedly less rosy picture. Regional transit mode share is projected to be a mere 3.7 percent in 2050. See DEIR at 4.15-30, Table 4.15-13. The fact that less than four percent of the region's residents will be travelling by transit in 2050 is a far cry from a "seismic shift." A Plan that is expected to cost \$200 billion of the taxpayer dollars to achieve a nominal increase in transit does a great disservice to the region's residents.</p>	<p>The goal of the Urban Area Transit Strategy (UATS) to create a "world class transit system" continues to be the focus of the transit improvements in the Plan. However, it should be noted that UATS did not focus on improving transit in all areas of the region, but rather on areas within the Urban Area boundary where existing and projected land uses and urban design would be conducive for transit. Thus, focusing on the overall regional transit mode share is not a relevant statistic, since it includes those areas where transit investments are not planned. It is also important to note the role other non-SOV modes like car/vanpooling, bike, and walk will play in creating a range of alternative travel choices.</p> <p>The UATS originally served as the primary process to facilitate the transit planning effort for the 2050 RTP/SCS, and now the Regional Plan. The planning process involved developing a range of differing transit strategies and approaches to determine the kind of transit future desirable for the San Diego region. It included brainstorming sessions, public opinion surveys, and public input questionnaires. It included public workshops, research on success stories from other cities, and review of previous market studies. It included the development of performance measures and mode share goals by which to test the strategies. The comment accurately states the overarching goal of the UATS, which is, 'to create a world-class transit system for the San Diego region in 2050, with the aim of significantly increasing the attractiveness of transit, walking, and biking in the most urbanized areas of the region.'</p> <p>Three initial transit strategies for the San Diego region were developed with input from transportation and land use professionals from our own region, from various places across the United States, and from other countries. Public input on the strategies was gathered; industry experts conducted critical reviews; the performance measures were evaluated; and there were many rounds of modifications and refinements, including the development of an "unconstrained revenue transit network."</p> <p>The comment states that, 'DRTP fails to live up to the authoritative promise of the UATS which has been cast aside as an inconvenient truth in favor of a highway-centric plan based on unsupported, arbitrary assumptions about land use and transportation.' However, it states clearly in the UATS that, 'the unconstrained network served as the region's wish list for transit and incorporated the best elements of the three initial strategies. This was followed by the development of five "revenue-constrained" networks, acknowledging the reality that projected long-term revenues are limited.' The UATS further states that the process resulted in a "preferred revenue constrained" transit network that was ultimately incorporated into the 2050 RTP and has since been refined in the Regional Plan.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1009		Cleveland National Forest Foundation	<p><u>II. There Are Feasible Transit-First Options for the Region.</u></p> <p><u>SANDAG is correct in one respect: people need more options for getting around than just a car. In order to achieve the region's climate change goals, SANDAG must immediately shift all planned roadway spending to other travel modes, and especially to transit investments. For many years, the region has over-invested in highways while under-investing in transit. Consequently, the region has an extensive highway system but a poor transit network, one that fails to serve many of its residents at all and under-serves the rest.</u></p> <p><u>The only way that SANDAG can reach its overarching goal of creating a "world-class transit system" is to begin forthwith to build a transit system with better coverage and better service region-wide. This is a large undertaking that will take years to complete, but the longer SANDAG delays in taking the first steps, the more it sets the region behind. Delay now makes progress increasingly difficult to achieve in the future. CNFF's 50-10 Plan includes the following key components:</u></p> <ul style="list-style-type: none"> <u>• A comprehensive, integrated transit system that would be constructed in phases. While San Diego ultimately needs a comprehensive regional transit system throughout the region, the 50-10 Plan would begin by building out a complete transit network within the urban core (including the Sprinter, Coaster and Blue Line corridors), where existing and future higher density land uses would best complement the expanded transit services.</u> <u>• A "transit system" that is well integrated. Random, fragmented transit routes that are scattered haphazardly throughout the region are ineffective. Without a comprehensive, well-integrated transit system, public transportation will never be able to become a truly viable alternative to the automobile in meeting the region's transportation mobility needs.</u> <u>• Halt to any further increase in road capacity. SANDAG must focus all investments in the first decade on transit in the region's core.</u> <u>• Modification of the TransNet program to re-prioritize transit over highway projects.</u> 	<p><u>The comment on the past focus on highway investments and not transit is well taken. Making up for the past imbalance by making a heavy investment in alternative modes is the focus of the Plan (and the 2050 RTP/SCS). The achievements of the transit system since the first Trolley line was completed in 1981 are noteworthy, and the Plan builds off these successes by working towards a rich network of rail, Rapid, and local bus services that will create fast and convenient transit connections to most areas within the Urban Area boundary where transit investment is focused. Combined with the emerging Mobility Hubs strategy for improving first-mile, last-mile connections to transit, transit will continue to play an increasing role in meeting the region's mobility needs.</u></p> <p><u>But it is important to note that no one mode can be the answer. Other alternative modes, including carpooling and vanpooling will need to play an increased role as well. This is the focus of the Managed Lanes strategy -- to provide dedicated lanes for transit and ridesharing that will allow these modes to bypass congested main lanes. The vast majority of the highway investments are on these Managed Lanes facilities and not SOV lanes.</u></p> <p><u>As explained in Chapter 3 of the Regional Plan the "majority of the funding sources are tied to certain types of projects (for example, transit infrastructure or highway operations and maintenance) and SANDAG does not have the authority to interchange them. These constraints come with specific provisions from Congress or the state Legislature." Despite these constraints, the Plan provides a balance among all modes, and allocates half of all funding to public transit (not including Managed Lanes investments, which also directly support the Plan's public transit investments).</u></p> <p><u>Regarding the 50-10 Transit Plan, please see response to comment 1016.</u></p>	Letter

No.	Name	Agency	Comment	Response	Source
1010		Cleveland National Forest Foundation	<p>III. The RTP/SCS EIR is Legally Inadequate.</p> <p>CNFF appreciates the strides that SANDAG has made with respect to analyzing the environmental impacts that would be expected to result from the 2015 RTP/SCS. SANDAG has corrected numerous errors identified by the Court of Appeal in connection with the EIR for the prior RTP, the 2050 RTP/SCS. For example, the EIR now analyzes impacts to all agricultural parcels, regardless of parcel size. Further, in response to CNFF's prior claims and the Court's holding that SANDAG's prior EIR failed to provide adequate information regarding air quality impacts, the 2015 RTP/SCS EIR now provides baseline data regarding existing air quality conditions, health risks and location of sensitive receptors. It also conducts a health risk assessment using EMFAC modeling and analyzes cancer and non-cancer risks due to toxic air contaminants near the freeways, providing a more complete analysis and mapping as requested in CNFF's lawsuit.</p> <p>With respect to GHGs, in response to CNFF's litigation, the 2015 RTP/SCS EIR now analyzes the consistency of the Plan's long-term GHG emissions trajectory with the emissions trajectory set forth in Executive Order S-3-05. It also includes an analysis of the Plan's consistency with Executive Order B-30-15.</p> <p>The 2015 RTP EIR also contains a more robust discussion of mitigation for GHG and air quality impacts, including many measures suggested by the Court of Appeal (e.g., encouraging parking management measures and coordinating low-carbon transportation with smart growth). The new EIR likewise recommends adoption of more mitigation, and with more defined standards, than the prior EIR. Finally, in response to the CNFF litigation, the new EIR analyzes a wider range of alternatives, including a variety of alternatives that are designed to reduce VMT by implementing more transit early in the Plan's deployment, not constructing all of the freeway and road projects, and locating even more dense development in urban, transit-friendly areas. SANDAG also takes an important step by describing the ways in which the region might meet the 2050 GHG emissions reductions goal. Although the EIR's analysis is based on implementation of current GHG regulations, policies, and programs, the document includes an "alternative scenario." DEIR at 4.8-38. This scenario identifies strategies such as moving toward 100 percent renewable electricity, 100 percent zero emission vehicle passenger fleet, and 90 percent landfill waste diversion. According to the EIR, with implementation of these strategies, regional emissions would be reduced to 77 percent below 1990 emissions, but would still fall short of the 80 percent below 1990 emissions reference point based on EO-S-3-05. <i>Id.</i></p> <p>Unfortunately, the EIR's analysis still violates CEQA because it provides no evidence to support its rejection of the environmentally superior alternative and fails to provide an adequate analysis of the various alternatives.</p>	<p>This comment accurately describes contents of the EIR, however, contrary to the commenter's remarks the EIR is in compliance with CEQA and provides evidence regarding the feasibility of Alternative 5D (the environmental superior alternative).</p>	Letter

No.	Name	Agency	Comment	Response	Source
1011		Cleveland National Forest Foundation	<p><u>A. The EIR Lacks the Evidentiary Basis To Reject the Environmentally Superior Alternative.</u></p> <p><u>The EIR identifies several “Type 5” alternatives that contain no additional roadway capacity and that would result in lower VMT and GHG emissions than the proposed Plan. The EIR identifies Alternative 5D as the environmentally superior alternative. Alternative 5D would complete all public transit projects, including all revenue unconstrained transit projects by 2025; eliminate the Plan’s investments in highways and managed lanes; convert existing general purpose lanes to managed lanes to accommodate “Rapid” routes; complete all active transportation projects by 2025; substantially increase land use densities; implement a policy change to substantially increase the cost of operating an automobile; and double parking prices at those locations that currently charge for parking. DEIR at 6-19 – 6-26. This alternative would increase VMT by about 7.2 million miles per year, or 9 percent, by 2050, compared to an increase of about 15.7 million miles per year, or 20 percent, by 2050 under the proposed Plan. Id. at 6-27.</u></p> <p><u>The EIR lists several reasons why this alternative—and all of the other Type 5 alternatives—is infeasible. Yet, the EIR provides no facts or substantive analysis to support its claims. As explained below, there is ample evidence that these alternatives, or variations on these alternatives, are feasible.</u></p>	<p><u>The letter asserts that the EIR violates CEQA because it lacks evidence to support its rejection of the environmentally superior alternative. This assertion is incorrect because the EIR does not “reject” Alternative 5D, the environmentally superior alternative. Rather, as required by CEQA, it identifies a potentially feasible environmentally superior alternative and compares its impacts to the proposed Plan’s impacts. (CEQA Guidelines Sections 15126.6(d),(e)(2).)</u></p> <p><u>The letter incorrectly asserts that the EIR lists several reasons why Alternative 5D and the other Type 5 alternatives are infeasible. The EIR does not find that Alternative 5 or the other Type 5 alternatives are infeasible, but rather considers them as “potentially feasible” alternatives. As discussed in Master Response 1, the feasibility of alternatives is considered twice in the CEQA process. At the outset, the Draft EIR considers a reasonable range of alternatives that are “potentially feasible” (CEQA Guidelines Section 15126.6(a).) At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) makes final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See Guidelines Section 15091(a)(3).)</u></p> <p><u>The EIR does disclose that feasibility of Alternative 5D would be affected by a number of factors such as the need to find additional funding or the need to change existing laws and regulations. But at the EIR stage, these factors essentially represent obstacles that would need to be overcome to implement this potentially feasible alternative. At the findings stage, the SANDAG Board’s final determination of feasibility will include judgement and policy considerations. For example, to the extent that the feasibility of alternatives evaluated in the EIR depends on changes in existing laws, regulations or funding patterns for transportation improvements, the SANDAG Board will judge the likelihood that such changes will occur within the time frame for implementation of relevant elements of the proposed Plan. (See Master Response 1.)</u></p> <p><u>Sections III(A)(1) through III(A)(5) of the letter assert that the EIR rejects Alternative 5D as infeasible for five specific reasons. The EIR does not reject Alternative 5D as infeasible for these or any other reasons. That being said, the Board of Directors may ultimately adopt a CEQA finding that Alternative 5D is infeasible because it would require major changes in state policy and legislation.</u></p>	Letter

No.	Name	Agency	Comment	Response	Source
1012		Cleveland National Forest Foundation	<p>1. The EIR Incorrectly Concludes that Alternative 5D Is Infeasible Because It Would Require Road Pricing Policy or Legislative Changes.</p> <p>The EIR asserts that Alternative 5D is infeasible because it would require road pricing policy changes to be implemented by the State of California (VMT or fuel fee or tax), or require a major change in State legislation to allow implementation by regional or local agencies such as SANDAG, cities, or the County. DEIR at 6-26. Even if this alternative would require legislative changes, such changes do not render the alternative per se infeasible. “[T]he mere fact that an alternative may require a legislative enactment does not necessarily justify its exclusion from the EIR . . . it may not be appropriate, for example, to disregard an otherwise reasonable alternative which requires some form of implementing legislation.” Citizens of Goleta Valley v. Bd. of Supervisors (1990) 52 Cal.3d 553, 573. Rather than reject this alternative because it may involve legislative and/or policy changes, the EIR should have described the specific action that SANDAG could take to facilitate such changes. For example, SANDAG could certainly lobby the State legislature to allow MPOs to implement more extensive road pricing policies.</p> <p>SANDAG could also commit to working with the state to set up a road pricing pilot program. There is precedent for such an approach. To develop a new way to fund Oregon's roads and highways, the Oregon Legislature convened an independent body of state legislators, transportation commissioners, local government officials and citizens to establish a road pricing program. See “User Fee Task Force,” Oregon.GOV, attached as Exhibit 13. The Oregon task force examined the challenges and benefits of a mileage-based road user charge system and conducted two pilot projects to gather driver feedback on different options. With input from the task force, the 2013 Oregon Legislature approved the Road Usage Charge Program to be operational July 1, 2015. Id. Similar to the efforts in Oregon, SANDAG could work with the state of California to implement a demonstration pilot program to explore the opportunities and constraints associated with a user based mileage fee.</p> <p>In conclusion, it is debatable that Alternative 5D, or any other “Type 5” alternative would require extensive policy or legislative changes. And, even if they would, this is not a sufficient reason to reject an alternative.</p>	<p>Regarding increases in road user pricing, the EIR discloses that even major increases in pricing would achieve relatively modest reductions in VMT and GHG emissions. Also, SANDAG has no legal authority to implement road pricing policies such as a new or increased fee or tax on the purchase of fuel or per vehicle mile of travel, nor does SANDAG have authority to compel the State legislature to increase road user pricing or grant such authority to SANDAG. (See Master Response 5.) The letter suggests that SANDAG could lobby the legislature to grant such authority, but the results of such lobbying would be speculative. Similarly, the results of working with the state to implement a demonstration road pricing pilot program would also be speculative. This conclusion is based on an analysis of several bills that have been before the California legislature since 2009, including Senate Bill 1330 (2009), Assembly Bill 744 (2009), and Assembly Bill 1023 (2011), all of which have specifically prohibited institution of tolls on lanes that have previously been non-tolled General Purpose lanes.</p> <p>Regarding road pricing, the Regional Plan includes dynamic pricing for Managed Lanes, similar to what is currently in place on the I-15 corridor, to ensure optimal conditions for carpools and transit vehicles. Revenues from toll-paying customers are used to help fund public transit in the corridor.</p> <p>Parking pricing also is addressed in the Plan since the region has learned that proactive parking programs can support thriving commercial districts, affordable housing development, and increased choices for travelers. To that end, SANDAG, in collaboration with local jurisdictions, businesses, and other community organizations, developed the Regional Parking Management Toolbox as part of the Regional Plan. The toolbox is one of many planning and financing tools that support smart growth and sustainable development.</p> <p>Additionally, Active Traffic and Demand Management (ATDM) is included in the Plan and builds on the Integrated Corridor Management (ICM) to dynamically monitor, control, and influence travel demand, traffic demand, and traffic flow of key highway corridors. ATDM facilitates the use of transportation alternatives through various approaches, including dynamic ridesharing, dynamic speed limits, dynamically priced parking, and predictive traveler information to improve overall highway efficiency and to maximize investment in ICM.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1013		Cleveland National Forest Foundation	<p><u>2. The EIR Incorrectly Concludes that Alternative 5D Is Infeasible Because It Would Require Changes in Land Use and Parking Policies and State and Federal Priorities.</u></p> <p>The EIR then states that Alternative 5D is infeasible because it would require major changes in land use policies, parking policies, and transit funding and that state and federal budgets and priorities would have to change. DEIR at 6-26. Here too, the EIR provides no detail about the specific land use and parking policies that would have to change or why such changes would be infeasible. Far from being infeasible, as discussed below, many local jurisdictions are well on their way to increasing land use densities. It has also become quite common for cities to increase parking costs, or otherwise manage parking to reduce vehicular travel. See "Parking Management: Strategies, Evaluation and Planning," Victoria Transport Policy Institute, attached as Exhibit 14. We can find no logical explanation for SANDAG to suggest that changes to land use and parking policies are infeasible, especially since it is about to adopt a Transit Oriented Districts Program that addresses the importance of, and provides strategies for, increasing land use densities and parking management. See Transit Oriented Districts Strategy for the San Diego Region, September 2015, attached as Exhibit 15. Moreover, the RTP/SCS EIR itself identifies parking strategies as a method for reducing VMT (at 4.15-25) and SANDAG has adopted a Parking Management Toolbox which provides local jurisdictions a framework for evaluating, implementing, managing, and maintaining parking management strategies. See SANDAG's Regional Parking Management Toolbox attached as Exhibit 16.</p> <p>Far from being infeasible, promoting compact development patterns and managing parking are now routine standard strategies for reducing VMT and GHG emissions. If SANDAG sees revisions to land use and parking policies as tools to achieve objectives such as supporting economic vitality, increasing safety, increasing accessibility and mobility, and promoting environmental protection, it should lead the region in this direction.</p> <p>Nor can SANDAG suggest that the state and federal government are somehow holding SANDAG back from adopting Alternative 5D. California continues to lead the nation on climate change policy. California's governors have issued Executive Orders such as S-3-05 and B-30-15. The State Legislature has passed numerous climate change laws including AB 32 and SB 375. The State has published ample material on climate change and makes available a Climate Change Portal which is a virtual research and information website for climate change mitigation and adaptation resources. See Climate Change Portal webpage, attached as Exhibit 17.7. In addition, the 2015-16 budget would allocate \$1 billion from Cap-and-Trade revenues for programs including transit and sustainable communities' implementation. See "Cap-and-Trade," League of California Cities, attached as Exhibit 18. It is for this reason that the program has expanded public transit, clean vehicle technology, the development of clean and fast high-speed rail, and responsible growth policies to encourage housing Californians near transit and job centers.</p>	<p>Regarding parking policies, SANDAG modeling and other research indicates even that major increases in parking pricing would achieve relatively modest reductions in VMT and GHG emissions. (See Master Response 5.) Also, SANDAG has no legal authority to require local jurisdictions to make parking price changes or implement new parking price systems described in the comments. However, SANDAG has integrated certain voluntary parking pricing concepts into feasible mitigation measures that were included in the EIR (Mitigation Measures GHG-4A and Measure GHG-4H), as well as the TOD Strategy and Parking Management Toolbox mentioned in the letter.</p> <p>Regarding increasing land use densities, the Regional Plan recognizes that the region has made great strides in planning for more compact, higher density, and walkable developments, and encourages higher density development, especially near transit. For example, the SCS land use pattern accommodates 79 percent of all housing and 86 percent of all jobs within the portion of the region covered by the Urban Area Transit Strategy (UATS), where the greatest investments in public transit are focused. Also, the Regional Plan includes a Regional Transit Oriented Development (TOD) Strategy that will be an important step toward implementing higher density near transit stops. The effectiveness of further increases in land use densities beyond densities in the SCS in reducing VMT and GHG emissions is speculative. (See Master Response 5.)</p> <p>Also, SANDAG has no legal authority to require local governments to implement higher density land use plans or projects. 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)).</p> <p>The letter also recites state and federal climate change initiatives as examples of why the state and federal governments are not "holding back" SANDAG from adopting Alternative 5D. However, the EIR does not include a "holding back" discussion; it merely states that, to be implemented, some features of Alternative 5D would require changes in state or federal policy or legislation. The state and federal initiatives to reduce GHG emissions cited by the letter are complementary to the GHG-reducing features of the Regional Plan and the EIR's GHG-reducing mitigation measures.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1013 Cont.			<p>Nor can SANDAG look to the federal government's priorities to suggest that Alternative 5D is infeasible. President Obama's Executive Order 13693 demonstrates the Federal government's commitment to curbing GHG emissions. E-O- 13693 calls for cutting Federal GHG emissions by 40 percent over the next decade from 2008 levels. See "Executive Order—Planning for Federal Sustainability in the Next Decade," attached as Exhibit 19. Furthermore, President Obama's 2016 budget proposal places sustainable transportation infrastructure front and center. See "Transportation and infrastructure take center stage in President Obama's 2016 budget proposal," A. Dodds, Smart Growth America, February 3, 2015, attached as Exhibit 20. While the proposed budget reauthorization includes funding for highway spending, it would increase transit funding by 75 percent to \$18.2 billion, including \$10.2 billion for the transit oriented development planning grant program. The budget proposal would establish a rail account and a multimodal account within the Highway Trust Fund, and allocate \$4.7 billion and \$1.25 billion to each, respectively. It would provide \$2.45 billion to maintain passenger rail assets, and would create a multimodal freight program funded at \$1 billion. Id.</p> <p>In conclusion, there is ample support from local jurisdictions as well as the state and federal government for transit first alternatives such as Alternative 5D. SANDAG lacks the evidentiary basis to reject such alternatives.</p>		

No.	Name	Agency	Comment	Response	Source
1014		Cleveland National Forest Foundation	<p><u>3. The EIR Incorrectly Concludes that Alternative 5D Is Infeasible Because It Is Not Fiscally Constrained.</u></p> <p><u>The EIR also asserts that Alternative 5D is infeasible because it includes transit projects that are not fiscally constrained. We understand that federal laws require RTPs to be fiscally constrained. Yet, there is no reason that SANDAG could not have crafted this alternative in a manner that eliminates the specific transit projects that are considered to be in the fiscally unconstrained category.</u></p> <p><u>Another approach, however, is to seek additional funding sources so that the transit projects that are currently in the unconstrained category could be implemented. While the RTP discusses the constraints to augmenting revenue sources for transportation, it only gives lip service to additional funding options such as mileage- based user fees, toll pricing, an increase to the fuel tax, an increase to vehicle weight fees, an increase to other vehicle-related fees, and opportunities for more public-private partnerships. RTP/SCS at 115. SANDAG should delve into each of these potential revenue sources and identify a role that it could play in helping to bring these funding sources to fruition. For example, as discussed above, SANDAG could take a proactive role in promoting a user based mileage fee that would replace or supplement the current gas tax.</u></p> <p><u>Another obvious source of funding for transit and active transportation is <i>TransNet</i>. The SANDAG Board has the authority to change the <i>TransNet</i> expenditure plan by a 2/3 vote, which could shift funding more dramatically from highways to transit.⁸ SANDAG should consider adopting an alternative that allocates all of the <i>TransNet</i> funding to the region's unconstrained transit projects. Such an alternative would educate the public and decision-makers as to whether sufficient funding exists within the <i>TransNet</i> pool of monies to fund the constrained <i>and</i> the unconstrained transit projects.</u></p> <p><u>There are numerous sources of funding that SANDAG could tap to fund unconstrained transit projects. Consequently, SANDAG lacks the evidentiary support that Alternative 5D is infeasible because it includes transit projects that are not fiscally constrained.</u></p>	<p><u>The letter states that SANDAG could have crafted this alternative to eliminate specific transit projects that are considered fiscally unconstrained. However, other alternatives (Alternatives 2 and 3) include a fiscally constrained transit network with some of the Alternative 5D features (in particular, acceleration of all transit to 2025). CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in a Draft EIR, or to consider additional potential alternatives that are not "considerably different" than those already evaluated in the EIR.</u></p> <p><u>The letter suggests that SANDAG seek additional funding sources so that unconstrained transit projects could be implemented. Although SANDAG will continue to explore such options, federal and State laws require SANDAG to develop an RTP/SCS built on reasonable assumptions of the revenues that will actually be available during the period covered by that plan. (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii).) (See EIR Master Response 2.) Regional Plan Appendix O provides details on the assumptions and constraints regarding the availability of all funding sources. Please also see the staff report on funding flexibility and phasing of transit projects provided to the SANDAG Transportation Committee on September 18, 2015 (Item 3, available at: http://www.sandag.org/uploads/meetingid/meetingid_4014_19722.pdf).</u></p> <p><u>The letter also suggests that SANDAG should consider adopting an alternative that allocates all <i>TransNet</i> funding to the region's unconstrained transit projects. However, this alternative would not achieve the basic project objectives and would not be feasible. The <i>TransNet</i> Ordinance assumes a 50 percent match in funds from other sources in order to complete the capital projects. In other words, to carry out the voter-approved list of projects included in the Ordinance, half of the funding in effect must come from other sources. The Regional Plan identifies the funding needed to match ("matching funds") the <i>TransNet</i> funds. Redirecting these matching funds away from <i>TransNet</i> projects to advance non-<i>TransNet</i> transit projects would create a funding hole that would prevent SANDAG from completing all <i>TransNet</i> Ordinance capital projects approved by the voters. (See EIR Master Response 2.)</u></p> <p><u>The capital cost of the transit projects in the unconstrained plan is approximately \$39 billion. The cost to operate these projects for the duration of the Plan would depend on their particular start year. Since the comment does address when the unconstrained transit projects should be built and operated, it is not possible to estimate the costs of operations in a way that is comparable to the costs assumed in the Plan. Nevertheless, the paragraphs below address the feasibility of operating the alternative suggested in the letter, as well as the feasibility of the building the transit capital projects.</u></p> <p><u>The <i>TransNet</i> program is anticipated to generate approximately \$22.8 billion through the remaining years of the Ordinance. Of this amount, approximately 30%, or about \$6.8 billion, of forecast <i>TransNet</i> revenues, are identified for transit operations and active transportation capital projects. Remaining <i>TransNet</i> transit capital projects will require approximately \$1.5 billion, including approximately \$1 billion for the MidCoast project. The allocation for the Environmental Mitigation Program, which cannot be changed by the Board since it is a lockbox program, is an additional \$1.36 billion through 2048. Assuming the commenter wishes to advance transit capital projects in a manner similar to what is proposed in the Plan for <i>TransNet</i> projects, additional finance charges of approximately \$8.2 billion would need to be paid. This would yield approximately \$4.9 billion in <i>TransNet</i> funds through 2050, currently allocated for Local Streets and Roads, highway and Managed Lane projects that, were the Board to do as the commenter suggests, would be available for transit capital and operations. The approximately \$4.9 billion in available <i>TransNet</i> funds is not enough to cover the approximately \$39 billion capital cost of the unconstrained transit projects that the commenter suggests be paid for with <i>TransNet</i> funds. When consider the operational cost of the unconstrained transit projects, the funding shortfall is even greater.</u></p> <p><u>The commenter's proposal is financially infeasible. The amount required to build the unconstrained plan set of projects far surpasses the amount of funds available, not even including the cost to operate these new services. When the cost to operate these new services is added, it becomes even more financially infeasible.</u></p> <p><u>The Plan allocates approximately \$39.3 billion to pay for transit operations. Of this amount, fares are forecast to cover approximately \$15.3 billion (or about 39% of the total). The remainder of the dollars required to pay for transit operations subsidies are comprised mainly by existing <i>TransNet</i> and TDA, and by an assumed future local sales tax measure. All of these fund sources are sales-tax based where funds are collected on a pay as you go basis. Advancing transit projects may generate additional fare revenues earlier in time; however, the revenues required to pay for the remaining approximately 61% in transit operations would not be available.</u></p> <p><u>While there may be an opportunity to re-direct funds to unconstrained transit projects, the funds to pay for the subsidies needed to operate these new services is not identified. As discussed in other responses, rules governing other funds, including state STIP and federal RSTP or CMAQ, preclude or significantly limit using them for operations.</u></p>	Letter

No.	Name	Agency	Comment	Response	Source
1015		Cleveland National Forest Foundation	<p>4. The EIR Incorrectly Concludes that Alternative 5D Is Infeasible Because It Would Not Be Consistent With Local General Plans or SB 375.</p> <p>The EIR states that Alternative 5D is infeasible because it would not be consistent with current local general plans and would conflict with SB 375. We do not dispute that SB 375 requires that the land use patterns included in an RTP/SCS be based on current planning assumptions, but as SANDAG itself recognizes, the region is already directing growth toward the more urbanized areas in west County. Its own Transit Oriented Districts Strategy states that, "During the last decade, more than half of local jurisdictions have updated their land use plans and zoning ordinances, collectively moving the region's vision of the future toward compact development near transit and greater open space preservation. Focusing housing and job opportunities in existing urbanized areas has replaced previous assumptions of more dispersed development patterns..." See Exhibit 15 [SANDAG's Draft Transit Oriented Districts Strategy].</p> <p>There is every reason to believe that local jurisdictions will continue to promote compact land use patterns. It is logical that a long term planning document such an RTP must do some amount of extrapolation from local jurisdictions general plans.</p> <p>The next iteration of general plans, i.e., those that will have a planning horizon more in line with the 2015 RTP/SCS (2035 to 2050) will almost certainly call for even more compact land development patterns than exist today.</p> <p>The City of Encinitas, for example, is putting together a plan that will increase density and intensity in order to comply with state law that requires affordable housing. To this end, city leaders are targeting 95 sites to be developed as high density transit villages. Until the city approves its plan, it is unable to apply for grant funding from SANDAG and is also on precarious legal grounds and vulnerable to lawsuits from developers and affordable housing advocates. See Encinitas Hopes to Comply with State Housing Law by 2016, M. Srikrishman, Voice of San Diego, September 4, 2015, attached as Exhibit 21.</p> <p>Nor can SANDAG suggest that SB 375 somehow prevents the agency from approving an alternative that calls for increased land use densities. It is not the intent of SB 375 to have regional planning agencies simply compile local land use plans. Instead, SB 375 envisioned that regional agencies would design alternative land use scenarios that would show local jurisdictions how growth might be redistributed, the role that transportation systems play with regard to growth patterns, and the effect that the transportation/land use interaction has on travel patterns and GHG emissions. Clearly, SANDAG understands its obligation to do some amount of land use forecasting. Its own Urban Area Transit Strategy ("UATS") states that 80 percent of all homes in 2050 are projected to be located within the UATS study boundary. See 2015 RTP/SCS Technical Appendix U-17. Consequently, SANDAG cannot reject Alternative 5D because it would not be consistent with local plans. At a minimum, SANDAG should be working with local agencies during their general plan update processes to identify and promote growth opportunities, particularly in transit priority areas.</p> <p>In as much as SANDAG clearly understands the role that increased land use densities play in reducing VMT and GHG emissions, it must take action to lead local governments in this direction. SANDAG could certainly adopt an alternative that includes a land use scenario that calls for substantial increases in intensity and density in those jurisdictions that are already advocating for compact development patterns, e.g., the cities of San Diego and Encinitas.</p>	<p>The letter suggests that the Regional Plan extrapolate from local general plans to continue the trend toward increasingly compact land use patterns. That is precisely the process SANDAG used to develop the Regional Growth Forecast which underlies the Regional Plan. To develop the Regional Growth Forecast, SANDAG engaged every land use authority in the region to seek input on land use assumptions beyond the horizon year of most local general plans. The letter cites the City of Encinitas as an example. As noted in this comment, SANDAG expects that local jurisdictions will continue to make changes to their land use plans in the future to allow for more compact, higher density, infill development patterns particularly near or adjacent to existing and planned transit. In fact, many of those types of land use changes have already occurred during the last ten years, or so and new development in the region reflects these changes.</p> <p>Please note that the statement that the City of Encinitas is not eligible for grant funds because it has not completed its housing element is inaccurate.. The city can apply for grant funds; it is not eligible, however, for the Board Policy No. 033 points (25 percent of the total points associated with grant funding) because it has not adopted a general plan housing element.</p> <p>The letter incorrectly implies that that SANDAG rejected Alternative 5D because its higher densities, which are not included in local plans, would therefore be inconsistent with SB 375. The letter makes claims about SB 375 "envisioning" that MPOs would design alternative land use scenarios that show local jurisdictions how growth might be redistributed; these claims are not supported by the text or legislative history of SB 375.</p> <p>Alternative 5D's "dense cores" land use pattern goes well beyond the compact development in existing general plans and planning input received from local governments. SANDAG has no authority to require local governments to adopt local land use plans or approve local land use projects that will this implement 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).)</p> <p>The letter suggests that SANDAG work with local government during their general plan updates to identify and promote growth opportunities, particularly in transit areas. SANDAG already does this. Since the adoption of the Regional Comprehensive Plan (RCP) in 2004 which called for smart growth and sustainable development, SANDAG has worked closely with local planning directors, public works directors, city councils, and the public to develop and periodically update the Smart Growth Concept Map, which identifies approximately 200 existing, planned, and potential Smart Growth Opportunity Areas in seven place type categories that promote compact, mixed use development in areas served by existing or planned transit. SANDAG uses the Smart Growth Concept Map as the basis to determine eligibility for local jurisdictions to receive funding from the Smart Growth Incentive Program. Many jurisdictions use the Smart Growth Concept Map as a planning tool to update their local general plans, specific plans, or master plans. SANDAG also provides a Smart Growth Tool Kit, which includes visual simulations showing how areas could be transformed through the application of smart growth principles, the Parking Management Toolbox, the Smart Growth Design Guidelines, and other resources. SANDAG does not have land use authority; many of SANDAG's planning efforts are geared toward providing incentives, educational materials, and policy direction for local jurisdictions to move toward more compact development focused around transit as they update and refine their local plans and policies.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1016		Cleveland National Forest Foundation	<p><u>5. The EIR Incorrectly Concludes that Alternative 5D and the Other "Type 5" Alternatives Are Infeasible Because They Would Have To Be Constructed by 2025.</u></p> <p><u>Finally, the EIR states that Alternative 5D and the rest of the Type 5 alternatives are infeasible because the revenue constrained and unconstrained transit projects would have to be constructed by 2025. This 10-year time period appears to have been influenced by CNFF's 50-10 Transit Plan. But, as discussed previously, the 50-10 Transit Plan does not propose to construct all transit over a ten-year period. Instead, it calls for focusing all investment over the next ten years on transit in the region's urban core, while also including the Sprinter, Coaster and Blue Line corridors.</u></p> <p><u>Not surprisingly, the EIR rejects all of the Type 5 alternatives, claiming it would be too expensive to implement and operate the accelerated capital program of these alternatives. For example, for Alternative 5A, the EIR states that this alternative would require \$42 billion by 2025:</u></p> <p><u>This would require approximately \$38 billion in new capital funds within a 10-year period, approximately eight times more than the anticipated \$4.8 billion in available revenue (see Chapter 3 of the proposed Plan for discussion of available revenues). The cost to operate the transit facilities would expand from approximately \$350 million annually in Fiscal Year 2015, to nearly \$ 1.25 billion annually in Fiscal Year 2025. Total operating costs over the 35 year period (by 2050) would be nearly \$59 billion, more than \$24 billion more than anticipated available revenues of \$34 billion for operations over that timeframe. DEIR at 6-20.</u></p> <p><u>SANDAG cannot identify alternatives that call for an unrealistic amount of transit over a short period of time and then claim that such alternatives are infeasible because they are too expensive.</u></p> <p><u>Moreover, SANDAG's assertion that the expense of Alternative A renders it infeasible is incorrect. As the Smart Mobility Report explains, Alternative 5A clearly is less expensive than the proposed RTP/SCS. The draft Plan includes roadway expenditures of \$22 billion in 2014 dollars. The lane conversion component of Alternative 5A might cost 10 percent of that, so about \$20 billion would be available to fund the unconstrained transit projects. This is more than enough to construct the unconstrained transit projects which are projected to cost about \$13 billion (2014 dollars). See Smart Mobility Report at 12.</u></p> <p><u>The Type 5 alternatives are clearly feasible; SANDAG should adopt the alternative that provides the greatest VMT and GHG emission reductions.</u></p>	<p><u>The letter mentions the 50-10 Transit Plan, which is a different proposal than Alternative 5A that would accelerate only some transit projects over a 10-year period. The EIR did not evaluate the 50-10 Transit Plan in detail because it is not a comprehensive alternative, but rather a modification to the accelerated transit component already included in each of the action alternatives (Alternatives 2, 3, 4, and 5A through 5D). Also, the delays in highway investments it envisions are similar to those included in Alternatives 3, 4, and 5A through 5D. CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in a Draft EIR, or to consider additional potential alternatives that are not "considerably different" than those already evaluated in the EIR. In addition, the 50-10 Transit Plan would not substantially lessen the Plan's transportation, GHG, or other significant impacts. (See EIR Master Response 1).</u></p> <p><u>Regarding the financial feasibility of Alternative 5A, the comment suggests that \$20 billion in roadway project funds included in the Regional Plan could be shifted to fund transit projects in Alternative 5A. However, the majority of the Regional Plan's funding sources are tied to certain types of projects (for example, roadways), and SANDAG does not have the authority to interchange them. Also, SANDAG has discretionary authority over only about 29 percent of the Regional Plan's funds, the rest being "pass through" funds. In addition, there are further constraints on when money becomes available during the lifespan of the Regional Plan, meaning funding programs typically are approved or collected on an annual basis and cannot be advanced. There are also constraints on which dollars stay with SANDAG and which dollars are distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. The lack of additional funding for transit operating expenses is another major constraint on accelerating capital additional investment in transit. (See EIR Master Response 2.)</u></p> <p><u>The Plan allocates approximately \$39.3 billion to pay for Transit Operations. Of this amount, fares are forecast to cover approximately \$15.3 billion (or about 39% of the total). The remainder of the dollars required to pay for the subsidy are comprised mainly by existing <i>TransNet</i> and TDA, and by an assumed future local sales tax measure. All of these fund sources are sales-tax based where funds are collected on a pay as you go basis. Advancing transit projects may generate additional fare revenues earlier in time; however, the revenues required to pay for the remaining approximately 61% in transit operations would not be available.</u></p> <p><u>While there may be an opportunity to re-direct funds to unconstrained transit projects, the funds to pay for the subsidies needed to operate these new services is not identified. As discussed in other responses, rules governing other funds, including state STIP and federal RSTP or CMAQ, preclude or significantly limit using them for operations.</u></p>	Letter

No.	Name	Agency	Comment	Response	Source
1017		Cleveland National Forest Foundation	<p><u>B. The EIR Does Not Adequately Analyze the Project's Alternatives.</u></p> <p><u>A fundamental flaw in the EIR's alternatives analysis is its failure to accurately describe existing transit conditions in the region. As a result, the EIR does not accurately evaluate the potential for any of the Type 5 alternatives to increase transit mode share in the region or to reduce VMT or GHG emissions.</u></p> <p><u>First, the EIR underestimates current transit use in the region. The RTP/SCS identifies the regional transit mode share in 2012 as 1.8 percent. See RTP/SCS, Appendix N, Table N.1 at 3. Yet, as the Smart Mobility Report explains, according to the California Household Travel Survey for 2012 ("2012 Survey"), the actual transit mode share for San Diego County residents is 4.4 percent, i.e., over twice as high. Smart Mobility Report at 7. The rate for home-based-work trips is even higher, 6.5 percent. Id.</u></p> <p><u>Second, the RTP, and therefore the EIR, substantially downplays how poorly the region's transit system currently operates. The RTP/SCS identifies an average transit travel time to work of 50 minutes. Yet, it currently takes much, much longer than this to travel to work on transit in the region. The 2012 Survey identifies a mean door-to-door travel time reported for work commuting trips with at least one transit segment as 81 minutes. Smart Mobility Report at 7. Therefore, the RTP and EIR appear to be missing the mark by 31 minutes. By underestimating transit travel times today, SANDAG is likely substantially underestimating the ridership gains that could be achieved by improving transit service.</u></p> <p><u>On a related note, the EIR substantially underestimates the amount of time it currently takes an individual to get to a job or to school via transit. The EIR states that "approximately 86 percent of the population was within 30 minutes of jobs and higher education enrollment using transit as of 2012." Smart Mobility Report at 8. This statistic does not appear to be accurate. For transit trips to be 30 minutes or less on a door-to-door basis generally requires short walks on both ends, a "one-seat ride" without transfers and frequent service. Such optimal transit situations are uncommon today in the San Diego region. Id. Furthermore, this statistic appears immediately above a table showing that only 77 percent of the population is within 0.5 miles of a transit stop. How can 86 percent of the population be within 30 minutes by transit to jobs if only 77 percent have any reasonable transit access? The EIR's failure to include accurate statistics regarding existing conditions, e.g., proximity to transit service and transit travel-time data undermines the entire alternatives analysis.</u></p>	<p><u>The EIR does accurately describe existing transit conditions in the region, based on generally accepted technical methodologies. The SANDAG Travel Demand model is estimated and calibrated to observed transit boardings and alightings. On an average weekday in 2012, 347,000 boardings were observed on the regional transit system. The SANDAG travel demand model estimates 339,000 system boardings. This difference of less than three percent of actual system performance and well within the range of reasonableness for a regional travel model.</u></p> <p><u>SANDAG uses boardings as its calibration measure because boarding and alightings are empirically observed and reported by the region's transit operators. Transit mode share is a derived statistic, and it is difficult to measure because it cannot be observed easily. For example, while the commenter states that transit commuter mode share is 6.9 percent, the U.S. Census Bureau reports via the American Community Survey reports (Source: U.S. Census Bureau, 2012 American Community Survey (1-Year Estimate), Table S0801: Commuting Characteristics by Sex;) that transit commute mode share was 2.8 percent.</u></p> <p><u>Regarding transit travel times, the commenter inappropriately compares "one transit segment" to an overall regional average. SANDAG agrees that some residents experience transit travel times above the regional average. The 2006 Household Travel Survey identified transit trips in excess of 120 minutes, and those are represented in the corridor travel times reported in Appendix N (see Otay Ranch - UTC). However, it is not appropriate to compare one corridor or one market segment to the regional average. The 2006 Household Travel Survey revealed an average travel time of 68 minutes to work for all transit riders and that was before the introduction of the SPRINTER, SuperLoop and other improved transit services between 2006 and 2012. The latest release (2006-2010) of the Census Transportation Planning Products (CTPP) from FHWA (source: CTPP 2006-2010 Transportation Profiles Geographic Area: San Diego County, California FIPS: 06073) reports the average transit travel time to work is 50 minutes for San Diego County.</u></p> <p><u>Regarding transit access to jobs, the commenter assumes no residents living further than 0.5 miles from a transit station would use transit. This assumption is not substantiated by observed travel behavior data. In the SANDAG 2009 On-Board Transit Survey, 20 percent of transit riders traveled further than 0.5 miles to access transit. For this particular measure, a person who resides 0.75 miles (15 minute walk) from a transit station would still have 15 minutes of in-vehicle time to access a job after arriving at the transit station.</u></p>	Letter

No.	Name	Agency	Comment	Response	Source
1018		Cleveland National Forest Foundation	<p>A third critical flaw is that the EIR concludes that Alternatives 2 and 3 would result in identical performance metrics implying that the sequencing of transit and roadway projects makes no difference. Smart Mobility Report at 10. Specifically, the EIR determines that total VMT, GHG emissions and air pollution would be equivalent in 2050 whether all transit and highway projects are assumed to be constructed in 2016 or 2049. See DEIR at 6-42, 6-43, 6-54, 6-67. This makes no sense. Investing in highways, especially adding capacity in suburban and rural locations, perpetuates decentralized low density development patterns. Sprawl development is highly auto-dependent and trip lengths are considerably longer than commutes in urban environments. Increasing roadway capacity also induces additional travel, which undermines attempts to increase transit ridership. Moreover, making transit investments in urbanized areas sooner will attract developers, employers, retailers and residents to those areas. Consequently, there can be no debate that the RTP's highway projects would result in increased VMT and GHG emissions compared to transit.</p> <p>SANDAG's failure to accurately depict the varying effect of transit compared to highway development on land use is a particularly frustrating since the 2050 RTP/SCS suffered from this same defect. As we explained,</p> <p>A fundamental problem in the 2050 RTP is that it takes credit for the benefits of more compact development while assuming that such a future will be achieved regardless of what transportation system is provided – whether auto- oriented, transit-oriented or a mix of the two. In reality, developers, home buyers and renters, and business owners are all strongly influenced by transportation investments. Investments in freeways have encouraged sprawl. This phenomenon has resulted in a vicious cycle whereby sprawl causes high traffic growth leading to more freeway investments leading to more sprawl. The RTP is in error when it assumes that compact development can be achieved with continued investments in suburban freeways. Accordingly, the agency is taking credit for benefits that will result from compact land use that will not result if the RTP is followed. See Exhibit 11 [50-10 Plan].</p>	<p>Fifty percent of the plan's investment is allocated toward the operation, maintenance, and development of the transit system which maximizes the benefits of more compact development. This fifty point percentage is roughly true of all time periods in the plan. See Master Response 2. SANDAG agrees that these investments will help attract developers, employers, retailers, and residents to these areas as suggested by the commenter.</p> <p>Federal law requires SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the time period covered by that plan. While we're anticipating around \$204 billion over 35 years, we don't have all the money right now. Also, a majority of the funding sources are tied to certain types of projects (for example, transit infrastructure or highway operations and maintenance) and we don't have the authority to interchange them. These constraints come with specific provisions from Congress or the state Legislature. The "revenue constrained scenario" for transportation investments detailed in our Regional Plan plays by those rules. It's what we can do given the budget we project.</p> <p>EIR alternatives 2 and 3 do have identical performance metrics in the year 2050, because those alternatives include the same land use and transportation components in the year 2050. Based in large part on public comments requesting advancement of transit and active transportation projects to the first 10 years of the Regional Plan and delay of highway investments to later years of the Plan, alternatives 2 and 3 are focused on showing how the various performance metrics for interim years like 2025 would be affected by advancement of transit and active transportation investments and delay of highway investment. The EIR does show the differences in total VMT, GHG emissions, and air emissions for each of the seven alternatives considered in detail and the No Project alternatives in Tables 6.0-3 and 6.0-4.</p> <p>In addition, the seven EIR action alternatives were developed in such a way as to show how different transportation investments assumptions (e.g. transit and highway) perform when combined with different land use assumptions. For example, Alternative 2 shows how VMT, GHG emissions, and other performance metrics would be affected by changes in nothing but the timing of transit investment: it includes the same SCS land use pattern and the same highway and managed lane assumptions as the Plan, and the advancement of transit projects to earlier years is the only variation from the Regional Plan. Other alternatives include additional variations from the Plan, such as advancement of more transit and active transportation projects that are not in the Plan, more compact land use patterns, elimination of all the Plan's highway and managed lanes, and others to show how different combination of transportation and land use assumptions affect performance, including VMT and GHG emissions.</p> <p>Regarding the comment on decentralized low density development patterns, the Regional Plan's SCS would result in more than 80 percent of future housing as multifamily development. Please also see EIR Master Response 4 explaining how the SCS decreases the number of households living in low-density neighborhoods and results in more of the region's households living in the region's most dense, urban neighborhoods. Master Response 4 also explains how these land use changes result in both fewer auto trips and shorter trips when they do drive.</p> <p>Regarding VMT, EIR Section 4.15 Impact T-1 reports that VMT decreases on a per capita basis over the life of the Regional Plan, and that total VMT increases over the life of the Regional Plan, and that's mainly because of the forecasted increase in population growth. Nevertheless, the EIR finds the total VMT increase to be a significant impact and identifies feasible mitigation measures to further reduce VMT. Regarding induced travel, EIR Section 4.15 Impact T-2 provides an analysis of induced travel and concludes that the Regional Plan will not substantially induce vehicle travel.</p>	Letter
1019		Cleveland National Forest Foundation	<p>In sum, the EIR's analysis of the RTP/SCS's alternatives is riddled with flaws. The document must be revised to accurately characterize existing transit conditions and objectively disclose the effects that highway projects have on VMT and GHG emissions. Such an analysis would likely determine that those alternatives that emphasize transit and delay highways would achieve sustainable reductions in VMT and GHG emissions.</p> <p>IV. Conclusion</p> <p>For the reasons set forth above, we respectfully request that SANDAG revise the draft RTP/SCS to incorporate transportation projects that are truly sustainable. Additionally, we request that no further consideration be given to the RTP/SCS until an EIR is prepared that fully complies with CEQA.</p>	<p>As explained in the above responses, the EIR's alternatives analysis meets CEQA requirements. It accurately characterizes existing transit conditions, and uses generally accepted technical methodologies to estimate VMT and GHG impacts of the alternatives...</p> <p>The Regional Plan invests 50 percent of all projected revenues to build, operate and maintain transit services. It includes transit projects in the revenue constrained network that the 2050 RTP/SCS has in the unconstrained network (six Rapid services and one streetcar) while adjusting the schedule for implementing a number of Managed Lanes and highway segments to later years in the plan.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1020	Livia Borak and Marco A. Gonzalez	Coastal Environmental Rights Foundation (CERF)	<p>Please accept the following comments on behalf of Coastal Environmental Rights Foundation (CERF) on San Diego Forward: The Regional Plan and Environmental Impact Report. CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California's coastal communities. CERF was established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents.</p> <p>The primary goal of an EIR is to identify a project's significant environmental impacts and find ways to avoid or minimize them through the adoption of mitigation measures or project alternatives. Pub. Res. Code §§ 21002.1(a), 21061. The lead agency must adopt all feasible mitigation that can substantially lessen the project's significant impacts, and it must ensure that these measures are enforceable. § 21002; Guidelines § 15002(a)(3), 15126.4(a)(2); City of Marina v. Bd. of Trustees of the Cal. State Univ. (2006) 39 Cal.4th 341, 359, 368-69. The requirement for enforceability ensures "that feasible mitigation measures are included in the project. Measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." Federation of Hillside and Canyon Assns. v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1261 (italics omitted); Guidelines § 15126.4(a)(2).</p> <p>If implemented, the RTP would result in significant and unavoidable impacts in almost every environmental category -- aesthetics and visual resources; agricultural and forestry resources; air quality; biological resources; cultural and paleontological resources; energy; geology, soils, and mineral resources; greenhouse gas emissions; hazards and hazardous materials; land use; noise and vibration; population and housing; public services and utilities; transportation; and water supply. DEIR at ES-4-19.</p> <p>The EIR discusses other approaches to reducing the Project's significant and unavoidable impacts, but it is clear that the agency is not serious about adopting additional viable measures. For example, the EIR mentions that SANDAG considered an "alternative scenario." DEIR at 4.8-38. Yet, this alternative scenario is not a true mitigation measure as it does not require SANDAG to take any action. Instead, the alternative scenario theoretically discusses how major changes in policies and regulations relating to increases in renewable energy use and electric vehicle penetration might affect VMT and GHG emissions. DEIR Appendix G at 1.</p>	<p>Please note that this comment letter was received on October 1, 2015, well after the close of the public review periods for the Draft Regional Plan and Draft EIR.</p> <p>Greenhouse Gas Scenario Analysis</p> <p>CERF references an "alternative scenario" analysis that was included in the Greenhouse Gas Appendix to the Draft EIR (Appendix G-4) that provides an analysis of hypothetical major changes in technologies, markets, and state and federal regulations that might be needed to achieve deep reductions in GHG emissions called for by Executive Order S-3-05. The EIR did not treat the alternative scenario or its components as a mitigation measure because they are infeasible.</p> <p>The alternative scenario analysis analyzes whether 100 percent renewable electricity, 100 percent zero emission vehicle passenger fleet, and 90 percent landfill waste diversion would enable the region to meet its "equal share" (if a share was assigned proportionally to the region) of GHG reductions pursuant to Executive Order S-3-05 (80 percent below 1990 GHG emission levels by 2050). The analysis demonstrates that even with these aggressive assumptions, the region would still fall short of meeting the target. This scenario analysis is not a mitigation measure or a CEQA alternative, but an analysis to provide context on possible measures that might be needed to achieve a regional goal based on the Executive Order goals.</p> <p>Along with other recent studies described in the EIR, this alternative scenario demonstrates that major technological, regulatory, lifestyle and other changes affecting nearly every aspect of economic and social life in California are needed if the Executive Orders' statewide reduction goals are to be met. Recent studies have shown that full implementation of many of the measures that could result in a 40% reduction of GHG emissions by 2030 and an 80% reduction of GHG emissions by 2050 in the San Diego region would require major changes in clean technologies utilization, markets, and state and federal policies and regulation. Full implementation of these changes is beyond SANDAG's or local agencies' current ability to implement. (See EIR Master Response 1.)</p> <p>Electric Vehicle (and Alternative Fuel Vehicle) Planning</p> <p>The letter suggests that SANDAG take actions to increase deployment of zero-emission vehicles (ZEVs). In addition to installing electric vehicle charging stations (EVCS) at transit facilities in the region, SANDAG has been implementing strategies described and included in the Regional Plan to expand ZEVs for a number of years, as described on page 79 in Chapter 2 of the Regional Plan. These actions represent regional efforts to recognize and support the goals of the state's ZEV 2015 Draft Action Plan.</p> <p>The letter suggests that SANDAG develop and adopt regional ZEV infrastructure plans and policies as part of the Regional Plan. Infrastructure planning was completed as part of the U.S. Department of Energy (DOE) funded EV Project for the San Diego region. SANDAG participated in the local stakeholder advisory committee assembled for the EV Project, and helped to prepare regional EV charging infrastructure deployment guidelines and identify potential optimal locations for publicly accessible EV chargers. This infrastructure planning effort informed the preparation of the San Diego Regional Plug-in Electric Vehicle (PEV) Readiness Plan described below and included as Appendix U.12 in the Regional Plan.</p> <p>The letter suggests SANDAG has not done enough to partner with other MPOs and the state to substantially expand ZEV programs. In 2012, SANDAG received a grant from the California Energy Commission (CEC) to support formation of the San Diego Regional Electric Vehicle Infrastructure Working Group (REVI), made up of stakeholders from local agencies, EVCS providers, San Diego Gas & Electric (SDG&E), and local contractors and businesses. This group is similar to the PEV coordinating councils that were formed in regions throughout the state. REVI met over the course of two years to identify barriers to the deployment of EVCS in the region, share successes, and develop best practices and resources to ensure the region is ready for the increased number of PEVs. This work resulted in the San Diego Regional PEV Readiness Plan (referenced in the Regional Plan and included as Appendix U.12), which was adopted by the SANDAG Board of Directors in January 2014. Several MPOs were awarded similar PEV planning grants and communicated regularly via monthly phone calls during the development of the regional readiness plans.</p> <p>The letter suggests SANDAG undertake actions outlined the ZEV 2015 Draft Action Plan, and its precursor, the 2013 California Community Readiness Handbook. The Regional PEV Readiness Plan aligns closely with the 2013 California Community Readiness Handbook. In fact, SANDAG staff contributed to the development of the Handbook as a member of the ZEV Community Readiness Guidebook Working Group. The barriers to EVCS and PEV deployment addressed in the Regional PEV Readiness Plan are similar to those addressed in the 2013 California Community Readiness Handbook:</p> <ul style="list-style-type: none"> • Lack of public knowledge of PEV and EVCS • Regional planning for public EVCS siting • PEVs in government fleets • Public agency EVCS installations • EVCS permitting/inspection • EVCS at multi-unit dwellings • Commercial and workplace charging • Zoning and parking rules • Building codes • Training and education for municipal staff and electrical contractors • Utility rates for EVCS 	Letter

No.	Name	Agency	Comment	Response	Source
1020 Cont.			<p>One key component of the alternative scenario calls for achieving a 100 percent zero emission vehicle ("ZEV") passenger fleet. DEIR at 4.8-38. But the EIR includes no indication that SANDAG is making the necessary effort to enable a 100 percent ZEV fleet within the region. An electronic search of the EIR for this alternative scenario component identified only one reference: "SANDAG is working with its partner MPOs in California and with ARB to identify further strategies to reduce GHG emissions such as substantially expanded zero emission vehicle programs, particularly in the later years of the proposed Plan that do not have SB 375 targets (2036 to 2050)." DEIR at 2-8. Yet, the EIR never explains its partnership with other MPOs or the state to substantially expand ZEV programs. If SANDAG is serious about reducing the Plan's GHG impacts, it should, at a minimum, adopt an array of strategies to expand ZEV programs. We note that the EIR includes a measure to fund electric vehicle ("EV") charging station infrastructure, which calls for the agency to install 36,000 EV chargers by 2035 and an additional 44,000 by 2050. <i>Id.</i> at 4.8-40 and 41. This is an important first step but the agency could go considerably further.</p> <p>SANDAG certainly could undertake certain actions as outlined in "ZEV 2015 Draft Action Plan: A roadmap toward 1.5 million zero-emission vehicles on California's roadways by 2025", See ZEV Action Plan, Governors' Interagency Working Group on Zero-Emission Vehicles, April 2015, attached as Exhibit A. For example, SANDAG could develop and adopt regional zero emission vehicle infrastructure plans and policies as part of its RTP which would include coordination of station maintenance to ensure ongoing fueling/recharging availability and minimize the potential for stranded vehicles. <i>Id.</i> at 13. SANDAG could also undertake a public education campaign so that consumers fully understand the benefits of ZEVs. Consumer education is critical to building interest in ZEV vehicles. Many consumers are unaware that ZEVs are available for purchase or lease. Others don't fully understand ZEV benefits such as operational cost savings, availability of high occupancy vehicle lanes on freeways, accessible public charging and even free or reduced price parking. <i>Id.</i> SANDAG could also work with local agencies to encourage the conversion of fleet vehicles to ZEVs. To this end, SANDAG could adopt a model ordinance that local agencies would then be able to tailor to fit their specific needs. See, e.g., the model ordinance that the Office of Planning and Research has included in its ZEV in California Community Readiness Handbook², attached as Exhibit B.</p> <p>Another component of SANDAG's alternative scenario calls for a 90 percent landfill waste diversion. DEIR at 4-8-38. Here too, we can find no indication that SANDAG is taking any effort to promote landfill waste diversion, let alone a 90 percent landfill waste diversion. SANDAG could adopt a zero waste initiative or collaborate with San Diego County in adopting such an initiative. At a minimum, SANDAG could require, as a condition of funding, that the construction of all transportation projects result in zero waste.</p>	<p>The letter suggests SANDAG undertake actions outlined in ZEV 2015 Draft Action Plan. Even though the ZEV 2015 Draft Action Plan details actions for the Governor's Office and state agencies to advance ZEVs, SANDAG has been working in support of the state's goals. Since the adoption of the Regional PEV Readiness Plan, SANDAG has pursued and been awarded two additional grants from the CEC to support the deployment of ZEVs: one to plan for all alternative fuels, and a second to implement the Readiness Plan. The work supported by these grants is described below.</p> <p>The first is a two-year planning grant that expands the previous PEV Readiness Plan effort to address all alternative fuels, including natural gas, hydrogen, propane, bio-fuels, as well as electric vehicles. This alternative fuel planning effort, called Refuel, began in 2014, and has involved expansion of the REVI working group to include additional alternative fuel stakeholders, subcommittee meetings on specific fuel types, and development of sector-specific toolkits for consumers, fleet managers, public agencies, first responders, and fuel marketers. Refuel has also supported alternative fuel training for SANDAG's Freeway Service Patrol (FSP). This training ensures that FSP workers are able to approach and appropriately handle a stranded alternative fuel or electric vehicle. In 2016, Refuel will culminate with the completion of a regional readiness plan for all alternative fuels. ZEVs include both PEVs and hydrogen-powered fuel cell electric vehicles; Refuel addresses both types of ZEVs.</p> <p>More recently, SANDAG received another two-year grant from the CEC to implement the Regional PEV Readiness Plan. This program, called Plug-in SD, provides technical assistance and resources to implement recommendations from the Readiness Plan. The grant began in July 2015, and includes the following activities that support actions in the ZEV 2015 Draft Action Plan:</p> <ul style="list-style-type: none"> • Offer training and technical assistance for local government staff to improve the permitting and inspection process for EVCS • Develop best practice resources on EVCS installations for local government staff, contractors, and other stakeholders • Provide technical assistance for siting EVCS at multi-unit dwellings • Expand PEV awareness activities, particularly at dealerships and workplaces <p>The letter suggests SANDAG undertake a public education campaign so that consumers fully understand the benefits of ZEVs. Consumers in California and the San Diego region are already adopting ZEVs; over 150,000 ZEVs¹ have been sold in California and over 13,000 ZEVs² have been sold in San Diego County. The Plug-in SD PEV awareness activities aim to ensure that dealers are equipped to handle questions from potential PEV buyers, employers understand the benefits of providing EVCS at their workplaces, and consumers are knowledgeable about the benefits and incentives available to purchase PEVs. Plug-in SD also includes an EV Expert as an on-call technical resource for local government staff, contractors, and potential EVCS hosts in the region.</p> <p>The letter suggests SANDAG work with local agencies to encourage the conversion of fleet vehicles to ZEVs. While SANDAG has not adopted a model ordinance for local agencies as the letter suggests, SANDAG supports and provides resources to assist local agencies in converting fleet vehicles to ZEVs. Local agencies have adopted policies committing to fleet vehicle conversion in local climate action plans, general plans, and other policy documents. As documented in the San Diego Regional Alternative Fuel Assessment³ prepared through Refuel, nine local governments, as well as the Port of San Diego and University of California San Diego, have already adopted policies to convert fleet vehicles to ZEVs or alternative fuels. As described on Page 92 in Chapter 2 of the Regional Plan, through the SANDAG Energy Roadmap Program, SANDAG partnered with the San Diego Regional Clean Cities Coalition (a U.S. DOE supported program to reduce petroleum use) to assess the fleets of the region's local governments and recommend options available for local governments to convert their fleet vehicles to alternative fuel vehicles, including ZEVs, detailing the costs, savings, and environmental benefits of the conversions. The Energy Roadmap for each city also describes incentives available and financing options to change out vehicles in their fleet.</p> <p>Through all of these ZEV programs, SANDAG works closely with and leverages similar ZEV deployment efforts in the region from the clean transportation team at the Center for Sustainable Energy and SDG&E. SANDAG also uses its Regional Energy Working Group to discuss ZEV infrastructure needs in the region and communicates with other MPOs and state agencies on their efforts to expand the use of ZEVs.</p> <p>Landfill Waste Diversion</p> <p>The letter suggests that SANDAG take action to promote 90 percent landfill waste diversion. However, SANDAG does not have the legal authority to implement a 90 percent landfill waste diversion initiative, and the technical feasibility of accomplishing this goal is speculative. EIR Mitigation Measures do include waste recycling and reuse measures for specific transportation and land use projects. GHG-4F, GHG-4G, and GHG-4H do require that SANDAG shall, and other agencies can and should, recycle construction debris and through solid waste recycling and reuse measure.</p>	

¹ <http://www.pevcollaborative.org/pev-sales-dashboard>

² <https://cleanvehiclerebate.org/eng/rebate-statistics>

³ http://www.sandag.org/uploads/projectid/projectid_487_18975.pdf

No.	Name	Agency	Comment	Response	Source
1020 Cont.			<p>Another feasible option to mitigate the Plan's numerous significant and unavoidable impacts is by incorporating specific components included in the EIR's alternatives. Indeed, it appears that SANDAG has already considered such an approach as the EIR explains that, "Other potential mitigation measures to reduce total VMT are included as components of the alternatives analyzed in Chapter 6.0, rather than as individual mitigation measures in this section. These include still more compact land use patterns, accelerated and increased transit investments, reduced or no highway investments, and policies to reduce transit fares, increase parking prices, and establish road user fees." DEIR at 4.15-24; (see also DEIR at 4.8-37 stating that mitigation measures to reduce the Project's GHG impacts are included as components of the project alternatives). But, here too, the EIR's approach is disingenuous. It asserts that the Type 5 alternatives, or components of these alternatives are mitigation measures, yet it rejects each and every one of the Type 5 alternatives as infeasible. This approach -- setting forth suggestions for mitigation that the agency assumes to be infeasible -- violates CEQA. CEQA Guidelines § 15126.4(a)(1). Yet, the EIR provides no actual evidence that the Type 5 alternatives are infeasible.</p> <p>Inasmuch as SANDAG has the means, as well as the legal obligation, to implement feasible, concrete, and enforceable mitigation measures we strongly encourage the agency to adopt the following measures:</p> <ul style="list-style-type: none"> • Complete all revenue constrained transit projects within the urban core by 2025; • Defer investments in highways and managed lanes until such time as the region has a comprehensive transit network in the urban core; • Convert existing general purpose lanes to managed lanes. routes; • Complete all active transportation projects by 2025; • Adopt a land use scenario that substantially increases land use densities; • Substantially increase the cost of operating an automobile; • Require that jurisdictions substantially increase the price of parking as a condition for receiving funding for highway and other projects; <p>In sum, 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.</p> <p>Thank you for your consideration of these comments.</p>	<p>Mitigation Measures Included in Alternatives</p> <p>The letter correctly points out that the EIR includes certain potential mitigation measures to reduce total VMT and GHG emissions as components of the Type 5 alternatives analyzed in Chapter 6, rather than as stand-alone GHG mitigation measures. The first four measures suggested in the letter address programmatic measures that would accelerate transit and active transportation projects and delay or defer investments in highways and managed lanes. Notwithstanding the letter's suggestion that these measures be analyzed as discrete "mitigation measures," such major types of programmatic changes are more appropriately considered as alternatives to the proposed Plan.</p> <p>The letter incorrectly states that the EIR rejects these potential mitigation measures as infeasible. Rather, the EIR properly considers the Type 5 alternatives as potentially feasible. As discussed in Master Response 1, the feasibility of alternatives is considered twice in the CEQA process. At the outset, the Draft EIR considers a reasonable range of alternatives that are "potentially feasible" (CEQA Guidelines Section 15126.6(a).) At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) makes final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See CEQA Guidelines Section 15091(a)(3).) (See EIR Master Response 1.)</p> <p>GHG Mitigation Measures Recommended in EIR and Letter</p> <p>SANDAG fulfilled its responsibilities under CEQA to consider feasible GHG mitigation measures that reduce GHG emissions. The EIR proposes eight feasible, concrete, and enforceable GHG mitigation measures for adoption (Mitigation Measures GHG-4A through GHG 4-H). These are proposed for adoption in the proposed CEQA findings that will be considered by the Board of Directors.</p> <p>Page 3 of the letter strongly encourages SANDAG to adopt seven different mitigation measures listed in bullets. Variations of all these measures are included as part of alternatives considered in the EIR (for example, in Alternative 5D), and the Board of Directors will consider the feasibility of these alternatives when it adopts CEQA findings. In addition, SANDAG has no legal authority to directly implement the last three bullets--substantially increasing densities, auto operating costs, and parking costs--as stand-alone mitigation measures. (See EIR Master Response 5.)</p> <p>Regarding the specific suggestion to condition transportation project funding to require local jurisdictions to substantially increase the price of parking, most SANDAG transportation project is state or federal pass-through funding (see EIR Master Response 2); by definition, SANDAG has no legal authority to place conditions on pass-through funding. Also, Mitigation Measure GHG-4A does encourage local parking strategies, including parking pricing, that reduce GHG emissions through revision of SANDAG grant program criteria. And Mitigation Measure GHG-4H includes parking pricing and other parking measures to reduce GHG emissions in the list of project-specific mitigation measures for development projects. (See EIR Master Response 5.)</p>	

No.	Name	Agency	Comment	Response	Source
1021	Monique Lopez	Environmental Health Coalition	<p>Thank you for the opportunity to comment on San Diego Forward: The Regional Plan. Environmental Health Coalition (EHC) advocates for a Regional Plan that ensures Transportation Justice. Transportation Justice requires that overburdened communities have increased access to transportation options, that there are improvements to public health and safety, and that there is equity in transportation planning, policies, and investment.</p> <p>The San Diego Forward: Regional Plan expands freeways, delays construction of transit and active transportation, and will harm public health. We urge the SANDAG Board to vote NO.</p> <p>The Plan does contain a number of transit and active transportation projects we are supportive of because they will greatly benefit the communities in the South Bay, such as the purple line trolley (Trolley 562), Rapid bus stop in Sherman Heights/Gold Hill communities, and 54th Street Rapid (Rapid 550). The benefits of these projects however are overshadowed by the many freeway projects that will be detrimental to the community's health and will not improve sustainable mobility in the long run. We are particularly concerned about increasing car capacity through lane additions on South Bay Freeways (i.e., I-5, I- 805, I-15, SR-94) that cut through many environmental justice communities and believe this type of planning and investment will perpetuate significant disparate impacts. As a result, the San Diego Forward: Regional Plan falls short of community needs.</p> <p>Residents living in the most impacted communities near the I-5, I-805, I-15, and SR-94 have made hundreds of written and oral comments over the past two years overwhelmingly in support for increasing and advancing public transit and active transportation projects rather than adding capacity to freeways for cars. Yet, the 2015 Regional Plan's freeway lane addition list looks nearly identical to the 2011 plan. The community has clearly called for advancement of a group of transit projects in order to improve local and regional mobility more quickly, especially in communities that are more transit dependent and overburdened by air pollution. There is a lack of evidence to suggest that the rearrangement of selected transit projects on its own will improve mobility and further reduce GHG emissions. Hence, the region needs a dual approach to improving mobility and reducing GHG emissions and air pollution, because an increase in transit mode share requires a reduction of vehicle mode share. By adding more capacity for cars on freeways, as proposed in SANDAG's "managed lanes" approach, vehicle miles traveled would thereby be increased. Therefore, we have asked that SANDAG take an alternative "managed lanes" approach that does not add lanes (capacity for more cars) to freeways and highways; but instead, employs innovative corridor strategies that convert existing general purpose lanes to managed lanes to accommodate Rapid routes and carpool (HOV). This approach is not reflected in the proposed Plan.</p>	<p>There are a number of transit investments in the urbanized area early on in the Plan that will benefit the communities cited, including: creation of an all-day 15 minute or better frequency on all bus, Rapid, and rail services by 2020, several new Rapid services and implementation of the Purple Line by 2035. In addition, other early projects such as the Mid-Coast Trolley Line and South Bay Rapid will provide faster, more frequent service to job centers in the University City/UCSD and Otay Mesa areas.</p> <p>The Regional Plan dedicates half of its projected expenditures to transit, a larger investment than any previous RTP. The Regional Plan creates a wide range of transportation choices to driving alone, including increased transit services, carpooling/vanpooling, bicycling, and walking. In many cases, the specific projects included in the Regional Plan are aimed at accommodating multiple transportation modes, including pedestrian, bicycle, and transit. For example, new Trolley lines include the development of "Mobility Hubs" that enable a wide range of options for accessing station sites such as bike lockers, carshare and bike share services, and shuttle services.</p> <p>The commenter expresses concern about potential lane additions on South Bay Freeways (i.e., I-5, I- 805, I-15, SR-94). All of the additional lanes proposed for South Bay to freeways are Managed Lanes, which will support the Bus Rapid Transit Network as well as carpooling and vanpooling, and will provide additional transportation options and increased access to jobs, housing, schools and hospitals for the surrounding communities. Each of these proposed projects will undergo a social equity analysis to ensure that they will not cause any significant disparate impacts for low income or minority populations.</p> <p>In terms of the conversion of General Purpose highway lanes to Managed Lanes; throughout the life of the plan, Managed Lane improvements have been incorporated on corridors with substantial traffic congestion to support carpools, transit services, and solo drivers who pay a fee (such as in the I-15 corridor). Net revenues from those fees help support transit operations along the corridor. In addition, concerning the feasibility of. Regarding conversion of General Purpose lanes to Managed Lanes, see response to comment 1012. Regarding conversion of existing general purpose lanes to managed lanes to accommodate Rapid routes and carpools/high occupancy vehicles, EIR alternatives 5A through 5D do include the conversion of general purpose lanes to managed lanes.</p> <p>The commenter requests that the Plan give priority to transit projects in areas shown as disadvantaged by CalEnviroScreen. The CalEnviroScreen tool cannot be used to model or predict the future; it is simply a snapshot of past or existing locations of disadvantaged populations. The Plan, however, bases the phasing of transit projects on modeling that evaluates present and future needs rather than present and past needs of all communities, including low-income and minority populations.</p> <p>The cost of riding Trolley, Rapid, and local bus services is less than the cost of owning and operating a car. While it is understood that the cost of using transit can be a challenge for some people, fares are an important part of the funding picture for operating transit. Given the limited amount of funding available for transit operations, reducing fares would likely mean that Trolley and bus services would have to be reduced to cover the loss in revenues. Discounts are available for seniors, persons with disabilities, and youth. Many companies will partially or fully subsidize the cost of monthly transit passes. EIR alternatives 5C and 5D reduce transit fares by 50 percent.</p> <p>Retrofit projects to improve bike/pedestrian access to existing transit stops and stations are included in the Unconstrained Network. However, these projects will be considered through the implementation of Mobility Hub projects, which are included in the Revenue Constrained Plan.</p> <p>Of the seven EIR action alternatives considered in detail, all seven advance transit and active transportation projects to the first 10 years of the Plan. Six the alternatives include advancement of transit and active transportation and also either delay or elimination of the Plan's investments in highways and managed lanes. In addition, as explain in Chapter 3 of the Regional Plan, the "...majority of the funding sources are tied to certain types of projects (for example, transit infrastructure or highway operations and maintenance) and SANDAG does not have the authority to interchange them. These constraints come with specific provisions from Congress or the state Legislature."</p> <p>Alternatives 5A through 5D are potentially feasible alternatives included in the EIR. The Board of Directors has not made a determination regarding the feasibility of any of the EIR alternatives; they will be asked to adopt findings regarding the feasibility of the EIR alternatives as part of their October 9, 2015, meeting on the Regional Plan and Final EIR.</p> <p>The EIR (p. 6-33 to 6-34) explains why this request for prioritization of transit projects in overburdened communities was rejected from detailed consideration in the EIR. In order to evaluate the availability of increased transit and active transportation investments to avoid or substantially lessen the significant impacts of the proposed Plan, the alternatives considered in detail include major investments in transit capital and active transportation improvements and major transit operations improvements in a variety of communities, including communities identified by the CalEnviroScreen model but not restricted to only those communities. The social equity analysis provided in proposed Plan Appendix H shows that the proposed Plan does not result in disparate impacts to disadvantaged populations, including minority and low-income populations. Also refer to the response to Plan comment 252 addressing CalEnviroScreen.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1021 Cont.	Monique Lopez	Environmental Health Coalition	<p>Developing a pathway for real solutions to improve regional transportation will require transitioning freeway funding to transit and active transportation projects. There is flexibility in state and federal funds that can be transitioned from increasing freeway capacity for cars to transit projects. We have urged SANDAG to transition funding from freeway projects to prioritize the development and operation of transit infrastructure and active transportation infrastructure. This approach is not reflected in the proposed Plan.</p> <p>There is a solution: Many of the elements in Alternative 5 in the DEIR would help meet community needs and we are in favor of transit projects to be phased within the 35 year planning horizon to make the implementation of transit projects more achievable. However, it is our understanding that it is not financially feasible to build all the transit projects within the first 10 years of the plan. Assuming this is so, it is understood that a phased approach will be required and we have stressed our support for the prioritizing building public transit projects that are located within the urban core and communities most overburdened as identified in the CalEnviroScreen tool. This approach is not reflected in the proposed Plan.</p> <p>There are many residents in our region that are unable to access the existing transportation network due to cost whose access could help increase future ridership and advance the region economically. Therefore, we have recommended the inclusion of no cost transit passes for the youth of families at or below the regional median income level. This is not reflected in the proposed Plan.</p> <p>There are many routes to existing transit stops in neighborhoods that lack bike and pedestrian infrastructure for safe routes to these transit stops and deters people from taking transit, biking, and walking options it is estimated that meeting this need regionally would take a commitment of \$500 million while adding two lanes to the SR-94 for approximately two miles is estimated to cost about \$600 million. In order to facilitate and encourage active transportation options we have urged SANDAG commit funding to complete all retrofits for safe routes to existing transit stations/stops, and prioritize retrofits in overburdened. This is not reflected in the proposed Plan.</p> <p>The Regional Plan falls short of community needs as outlined in this letter. Therefore, we are not able to support the Regional Plan as it stands and urge the SANDAG Board to vote No.</p> <p>We appreciate your consideration of these comments throughout the process and look forward to working together to further strengthen future Regional Plans.</p>	<p>SANDAG agrees that safe routes to transit are important to achieving the proposed Plan's vision and goals, and as such has included in the proposed Plan funding for safe routes to transit improvements for all of the Plan's new transit stations. SANDAG will continue to explore additional funding for safe routes to transit retrofits at existing transit stations. As explained in proposed Plan Appendix E, the proposed Plan's mobility hub implementation strategy will explore opportunities to implement safe routes to transit projects at existing transit stations as part of mobility hub implementation. As explained in the Draft EIR (p. 6-31), the unconstrained active transportation network includes Safe Routes to Transit investments for existing transit stations that are not served by Rapid routes under the proposed Plan, and bicycle and pedestrian improvements for highway interchanges that are not improved under the proposed Plan. These are not included in the alternatives considered in detail because the benefits of these types of site-specific improvements to improve pedestrian and bicycling conditions (e.g., shorter pedestrian crossings, pavement markings, traffic calming) are difficult to quantify in the regional transportation model. However, the alternatives considered in detail include completion of all active transportation projects by 2025.</p> <p>SANDAG agrees that active transportation investments are important to achieving the proposed Plan's vision and goals, and as such has included in the proposed Plan funding for active transportation improvements as part of all of the Plan's highway and freeway interchange projects. Retrofit active transportation improvement projects surrounding existing highway on- or off-ramps will be considered for implementation as part of future operations and maintenance projects using State Highway Operations and Preservation Program (SHOPP) dollars. The proposed Plan also includes full build-out of the entire regional bike network. SANDAG will continue to explore additional funding for active transportation improvements at existing freeway and highway interchanges. Similar to Safe Routes to Transit investments, active transportation retrofits at freeway interchanges and safe routes to schools investments are not included in the alternatives considered in detail because the benefits of these types of site-specific improvements to improve pedestrian and bicycling conditions (e.g., shorter pedestrian crossings, pavement markings, traffic calming) are difficult to quantify in the regional transportation model. However, the alternatives considered in detail include completion of all active transportation projects by 2025, and CEQA does not require that an EIR consider multiple variations of the alternatives considered in detail. Therefore, the EIR does not include an additional alternative in which active transportation projects are advanced to 2021 instead of 2025.</p>	

No.	Name	Agency	Comment	Response	Source
1022	Livia Borak	League of Conservation Voters, San Diego	<p>Please accept this letter on behalf of League of Conservation Voters, San Diego (LCVSD). LCVSD is a chapter of the California League of Conservation Voters (CLCV), which seeks to protect the environmental quality of the state by working to elect environmentally responsible candidates and hold them accountable to the conservation agenda.</p> <p>As a regional agency comprised of representatives from individual municipalities, SANDAG plays not only a unique role in shaping the region, but a critical responsibility. Today, SANDAG representatives face a significant task in reviewing the San Diego Forward: The Regional Plan ("Regional Plan"). As potentially one of the region's most important mechanisms to address climate change, the Regional Plan fails in this regard. The Regional Plan's own CEQA documents reveal its failure to meet either interim or 2050 state greenhouse gas reduction targets. In light of its commitment to continued freeway expansion and failure to meet greenhouse gas reduction goals, the Regional Plan is unsupportable. LCVSD strongly urges SANDAG board members to vote against the Regional Plan, especially members that represent agencies with strong local greenhouse gas reduction plans. Of particular concern is the Regional Plan's role in frustrating member agencies' attempts to reduce greenhouse gas emissions and an apparent disregard for its member agency's attempt to do so.</p>	<p>Regarding GHG targets, the only mandated greenhouse gas (GHG) emission targets applicable to SANDAG are the SB 375 per capita GHG emissions reduction targets for passenger vehicles. The Plan exceeds these targets. The Draft EIR (Impact GHG-2) demonstrates that the Plan would not conflict with the State's ability to achieve the AB 32 target of reducing statewide GHG emissions to the 1990 levels by 2020. Although the EIR compares the Plan's GHG reductions to a 2030 regional reference point based on Executive Order B-30-15, there is no mandate for the proposed Plan to "comply" with the statewide GHG reduction goal. Executive Orders S-3-05 and B-30-15 contain goals that are based on the aggregated efforts of all sectors across the state and have not been broken down into "shares" of responsibility for agencies like SANDAG for 2050. SANDAG is responsible for meeting the targets for this region set by the Air Resources Board pursuant to SB 375 for 2020 and 2035. The Plan and its SCS will meet and exceed the SB 375 targets.</p> <p>With regards to local climate action plans (CAPs), the Regional Plan supports the goals for GHG reduction included in local CAPs. As described on page 92 in Chapter 2 of the Regional Plan, SANDAG works closely with the local jurisdictions to provide the necessary data and assist with obtaining resources to develop and implement their CAPs.</p>	Letter
1023	Livia Borak	League of Conservation Voters, San Diego	<p>Historically, SANDAG's regional plans have dismissed increased transit based on funding constraints. The Regional Plan continues this trend. However, because the Regional Plan is based on a presumption of financial resource allocation, including the Quality of Life Initiative, LCVSD believes the Regional Plan's commitment to continued freeway expansion projects is a self-fulfilling prophecy based on artificial constraints. Therefore, LCVSD believes further commitment to freeway widening projects in a Quality of Life Initiative is inappropriate. Likewise, SANDAG representatives' attempts to leverage the Quality of Life Initiative for support of the Regional Plan and vice versa is inappropriate.</p> <p>To that end, LCVSD will actively oppose a Quality of Life Initiative that does not achieve the following directives:</p> <ol style="list-style-type: none"> 1. No funding of freeway expansion projects. 2. A reallocation of TransNet funds to transit projects. 3. Funding to meet long-term requirements for implementing habitat conservation plans in the San Diego region could not be used to mitigate for individual project impacts. 	<p>The SANDAG Board of Directors is considering a funding measure that could be placed on a future ballot, but has not made a decision about the timing of such a measure. The <i>TransNet</i> Ordinance requires that the Board of Directors act on an additional regional funding measure to meet the long-term requirements for implementing habitat conservation plans in the San Diego region. In addition, the Board of Directors has been considering other regional funding needs that could be included in a potential measure, such as transportation and water related investments. Specific projects and programs have not been decided at this time.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1024	Marva Bledsoe	Oceanside Chamber of Commerce	<p>On behalf of the Oceanside Chamber of Commerce Board of Directors, we are writing to express our support of the San Diego Forward: The Regional Plan, as recommended by SANDAG. Our organization represents the interests of industry, business and landowners in the Oceanside and North Coastal areas of North San Diego County.</p> <p>We continue to enjoy steady growth in our community, including increased tourism, and continue to support all efforts to provide adequate public services along with responsible and sustainable growth strategies. Oceanside is the gateway to the rest of the Coastal area in San Diego County and, more importantly, the gateway for most of the tourist traffic using Interstate 5.</p> <p>The tourism and normal daily traffic along I-5 is dependent on significant infrastructure investment to ensure efficient movement of vehicle traffic through the city. San Diego Forward's planned expenditures for the improvement of the interchange at I-5 and State Route 78 are critical to keeping the traffic flowing south and east through the coastal corridor. This improvement is needed sooner, not later, than is projected in the plan.</p> <p>Oceanside is also home to the North County Transit District main transit hub, providing options for all travelers to connect with other North County areas and the City of San Diego.</p> <p>The San Diego Forward Regional Plan promotes a sound, balanced strategy to accommodate our region's future growth while protecting the environment, promoting economic development, and maintaining our quality of life.</p>	<p>Thank you for your support of the Regional Plan. The Regional Plan recognizes that the I-5, SR 78 and Coastal Rail Corridor improvements are of critical importance to facilitate tourism and access to jobs in North County and to connect workers to all parts of the region.</p>	Letter
1025	Andy Hanshaw	San Diego Bike Coalition	<p>The San Diego County Bicycle Coalition urges SANDAG to include the Rose Creek Coastal Connection in San Diego Forward: The Regional Plan.</p> <p>This project, a bicycle and pedestrian bridge over the railroad tracks and Rose Creek at the confluence of Rose and San Clemente creeks, has been designed by the Coalition to be compatible with the MidCoast and other rail projects. The design process, which is nearing completion, has been coordinated with SANDAG and its staff for over three years.</p> <p>The connection provides an important bicycle and pedestrian connection within the Rose Creek watershed, connecting the communities of Clairemont and University City to Pacific Beach and Mission Bay and our beaches. The project is a key recommendation of the Rose Creek Watershed Opportunities Assessment as it physically will re-link the watershed to allow pedestrian and bicycle circulation that will otherwise be curtailed by the construction of the MidCoast.</p> <p>The Rose Creek Coastal Connection would serve existing users of Rose and San Clemente (Marian Bear) canyons and future users of the expanding regional bicycle and trail network.</p> <p>The Rose Creek Coastal Connection is consistent with the City of San Diego Bicycle Master Plan and received near unanimous approval of the three planning groups in the areas served: Clairemont Community Planning group (10-0; February 17, 2015), the University City Planning Group (12-1; April 14, 2015) and the Pacific Beach Planning Group (14-0; January 28, 2015).</p>	<p>With the adoption of the Regional Bike Plan Early Action Program (EAP) SANDAG is currently focusing resources on implementation of the highest priority projects as identified in the EAP. It is anticipated the Regional Bike Plan will be updated in the 2018-2019 timeframe. Suggested updates to the network will be considered comprehensively to maintain the integrity of network connectivity. Updating the Regional Bike Network within the context of an updated Plan will also give us the opportunity to potentially reprioritize implementation to align with new goals and policies.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1026	Joe Terzi	San Diego Tourism Authority	<p>I am writing to you on behalf of the San Diego Tourism Authority. As you are well aware, tourism is an important component of San Diego's regional economy. In 2014, over 33 million visitors came here generating \$15 billion in economic impact and \$176 million in Transient Occupancy Tax revenues for the City of San Diego alone.</p> <p>Our industry has a vital interest in the region's transportation system. Obviously, before visitors can enjoy San Diego, they have to get here. They arrive here on all modes of transportation such as land, air, sea and rail. It is estimated that 7 million arrive by plane at Lindbergh Field, 726,000 arrive by train, and 25 million arrive by car. Ease of access can be a major factor in deciding whether to choose San Diego as their destination.</p> <p>We are pleased to see that San Diego Forward includes a host of far-reaching additions to San Diego County's transportation network. The \$200 billion infrastructure investments called for in the plan presents a significant opportunity for SANDAG to provide a variety of transportation choices for residents and visitors alike.</p> <p>We have reviewed the alternatives studied in the environmental document and feel strongly that San Diego Forward as proposed offers the best balance among the various transportation modes on which tourism depends. We support the proposed projects and their phasing as the best and most reasonable way to accommodate the needs of residents and visitors.</p>	<p>Thank you for your support. SANDAG will continue to work with the San Diego Tourism Authority to support infrastructure investments, policies, projects, and programs to support the thriving tourism industry in the San Diego region. Additionally, the Plan recognizes the need to accommodate both visitors and residents in terms of providing more mobility solutions.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1027	Mike Bullock and Debbie Hecht	Sierra Club San Diego	<p>The proposed 2015 Regional Transportation Plan (RTP) does not adequately address San Diego County's urgent transportation needs congruently with the City's Climate Action Plan (CAP) goals. We respectfully request that you defer the vote until the RTP can be measured by the City's CAP. This will mean moving transit projects and expenditures to years 0-5 in order to achieve climate-stabilizing targets. We challenge our regional representatives to have the courage and leadership to stand up for what's right for the greater good of the community and the health of citizens.</p> <p>Sierra Club encourages SANDAG to revise its draft RTP update to more closely conform to the goals of the City's Climate Action Plan. SANDAG'S RTP must take the leadership role in ensuring that all jurisdictions within the County of San Diego are meeting the State-imposed mandates to achieve climate stabilizing targets as mandated in Executive Orders S-3-05 and B-30-15. Figure 1 (shown at the bottom of this letter) is Figure 4.8-1of the DEIR of the proposed RTP. It shows that the proposed RTP does not achieve our state's climate mandates.</p> <p>The 2015 update to the SANDAG RTP should be based on the following information and principles:</p> <ol style="list-style-type: none"> 1. The RTP is inextricably linked to the City of San Diego's Climate Action Plans. According to the Energy Policy Initiatives Center (EPIC) Inventory, cars and light-duty vehicles (LDVs) emit 41% of our greenhouse gas (GHG). How can you approve an RTP without measuring it against the City's Climate Action Plans? 2. SANDAG must strive to provide modes of transportation that make transit easy and affordable to get people out of their cars, to minimize vehicle-miles travelled (VMT) and therefore the reduction of GHG. 3. Expansion of freeway infrastructure, including new Managed Lanes, and the construction of new freeways will only encourage more driving, will not create viable alternatives to automobile transportation, and in fact will result in increased VMT, more GHG, poorer air quality, and ultimately, no congestion relief, putting us farther behind our climate stabilizing targets as outlined in the CAP. 4. Our July 15 comment letter contains detailed descriptions of measures to reduce driving and we ask that these measures need to be incorporated into the 2015 RTP. 	<p>First and foremost, it is important to understand what the Regional Plan actually does for transit: It invests \$100 billion in transit over the next 35 years (half the funds in the Plan go to transit.) In the next five years alone, 75 percent of the funds in the plan will go to transit and active transportation – that includes the Mid-Coast Trolley, South Bay BRT, Mid-City Centerline, and coastal rail double tracking. The result will be a 15 percent increase in the number of residents in the region with access to high frequency transit – a jump from 35 percent to 50 percent regionwide.</p> <p>The transportation network included in the Regional Plan is a balanced approach that addresses the needs of the entire region. Different areas of the region require different solutions. The Plan invests half its resources into transit, which works best in high density areas. And \$5 billion is dedicated to creating a complete bike and pedestrian network. Other funds go to adding managed lanes to our highway system – to allow travelers in the suburbs to choose transit (like Rapid) or to carpool, while still maintain a functioning freeway system. The Regional Plan's transportation network improvements consist of the highest ranking projects that can be accommodated with available funding amounts and other funding restrictions. The performance criteria used to rank the projects was developed at the beginning of the planning process through a public process and ultimately accepted for use in developing the Plan by the Board of Directors.</p> <p>Further, the City of San Diego's transit mode share goals are only for most dense areas of the city and do not represent the entire City of San Diego.</p> <p>The City of San Diego's climate action goals rely on major contributions from many areas. Federal and state regulations requiring lower emissions and more efficient vehicles and other advances represent substantial majorities of the progress the city expects to make. SANDAG will also contribute by coordinating land use and transportation investments. In fact, SANDAG's plan actually achieves greater reductions than the Draft Climate Action Plan assumes. In order to achieve its goals, the city's draft CAP lays out the additional actions it intends to take.</p> <p>Moreover, the Regional Plan and the City of San Diego's Draft Climate Action Plan are complementary plans that show how the City of San Diego and SANDAG can work together to coordinate local actions and regional investments in ways that increase transit use, walking, and biking and reduce GHG emissions. The Draft CAP includes GHG reductions from SANDAG's prior RTP/SCS adopted in 2011 and shows that the prior plan's compliance with SB 375 regional GHG targets from passenger vehicles will help the City of San Diego meet its GHG reduction targets. The Draft EIR for the Regional Plan concludes that the Regional Plan would not conflict with the currently adopted City of San Diego CAP, the 2005 City of San Diego Climate Protection Action Plan. Because the 2015 CAP is still in draft form and subject to change, it cannot serve as the basis for an EIR consistency determination with an adopted CAP. As described on page 92 in Chapter 2 of the Regional Plan, SANDAG works closely with the City of San Diego and other jurisdictions as they develop and implement their CAPs.</p> <p>Monthly passes and daily passes provide discounted access to all services. Future improvements to smart cards will further improve access, convenience, and options for using transit.</p> <p>The Plan seeks to create a number of alternative choices to driving alone. In addition to transit, carpooling and vanpooling are equally important to decreasing VMT. Managed Lanes provide priority bypass of congested main lanes for both transit and ride sharing.</p> <p>The SANDAG Transportation Demand Management (TDM) division manages programs and services that reduce traffic congestion by encouraging the use of transportation alternatives. This includes educating the public on their transportation choices and providing incentives and support for vanpooling, carpooling, transit, biking and telework.</p> <p>While parking management decisions lie with local jurisdictions, SANDAG provides resources and tools to support local jurisdictions with proactive parking management efforts. SANDAG recently completed a Regional Parking Management Toolbox to assist staff and policy makers from local jurisdictions with developing comprehensive parking management programs that include pricing strategies for managing parking demand.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1028	Mike Bullock and Debbie Hecht	Sierra Club San Diego	<p>The Sierra Club requests that the RTP include the following to be consistent with San Diego's proposed CAP include:</p> <ol style="list-style-type: none"> 1. Re-prioritize transit by moving funding and construction of transit projects to years 0 to 5. 2. Create park-and-ride lots where people can drive from home, park their cars, and ride clean-emissions buses to major commute and travel destinations. Bus schedules are flexible and easily adjusted for peak times and special events. Prioritize using electric buses supported by solar generating stations at bus depots. 3. Increase public transit options (including small vans, buses and light rail) and frequency of service in the urban core and densely populated areas to make using transit easier. 4. Encourage bicycle commuting by creating segregated bicycle paths by re-striping, and providing safe cycling options for cyclists throughout the County. 5. Limit sprawl by discouraging (by disincentives) municipalities from approving subdivisions or planned communities more than 10 miles from job centers, which are not served by adequate transit. 6. Encourage by ease of permitting and economic incentives to increase the use of charging stations with solar installation on warehouse facilities to electrify cars, light delivery trucks and commercial vehicles. 7. Urge the state to adopt environmentally-sound road usage charges and to speed up the pilot project creation currently progressing under SB 1077. 8. Work for a demonstration project of a system to mitigate the harm of bundled-cost parking at places of employment, as described in our July 15th letter. 9. Increase Coaster stops to ease traffic on I-5 in North County, especially by providing a stop at the Del Mar Fairgrounds so people can walk to events. <p>Sierra Club is confident that SANDAG can, within your 2015 deadline, draft a 2015 RTP that encompasses the principles and priorities outlined in this letter, and which will be consistent with the two Climate Action Plans drafted by the City and County of San Diego.</p> <p>We represent the Sierra Club's 12,000+ members who look to you to provide the leadership necessary to create a sustainable and equitable transportation system that protects air quality and helps to reduce climate change for all the citizens of San Diego County.</p>	<p>First, as described in several other responses, the Regional Plan is not inconsistent with the City's draft Climate Action Plan; they are complementary plans. As explained elsewhere, the City's own draft CAP shows how the regional investments of SANDAG and local actions that the City itself proposes to take on can work together to achieve the GHG and other mode share goals that the City has set for itself. Second, the City's draft CAP does not call for SANDAG to do any of the 9 actions listed in this comment; again, the City's draft CAP shows how local actions that the City proposes to undertake can build off of the reductions from federal and state actions and also SANDAG's Regional Plan to achieve its GHG and other goals. Nevertheless, responses to the commenter's 9 points are provided below.</p> <ol style="list-style-type: none"> 1. Federal law requires SANDAG to develop a Regional Plan built on reasonable assumptions of the revenues that will be available during the time period covered by that plan. While we're anticipating around \$204 billion over 35 years, we don't have all the money right now. Also, a majority of the funding sources are tied to certain types of projects (for example, transit infrastructure or highway operations and maintenance) and we don't have the authority to interchange them. These constraints come with specific provisions from Congress or the state Legislature. The "revenue constrained scenario" for transportation investments detailed in our Regional Plan plays by those rules. It's what we can do given the budget we project. That being said, 50 percent of the plan's investment is allocated toward the operation, maintenance, and development of the transit system. This percentage is roughly true of all time periods in the plan. 2. Most existing and future Trolley, COASTER, and Rapid bus stations have park-and-ride facilities. All bus vehicles are expected to be powered by Compressed Natural Gas engines; however, fuel technologies are likely to evolve over time. 3. The transit plan includes a 10-minute all-day network of rail, Rapid, and local bus services in the urbanized areas. 4. Repurposing of existing roadway to include bikeway facilities can be an efficient and cost effective strategy when included as part of larger roadway improvement projects and/or when a roadway is resurfaced. SANDAG can work with the Active Transportation Working Group and the Cities/County Transportation Advisory Committee to encourage this approach and share best practice strategies and applications to integrate bikeways into local roadway improvement process. 5. SANDAG does not have land use authority; however, SANDAG can and does influence local land use patterns through regional transportation investments, incentive grant programs, habitat management plans, intergovernmental review, and coordination in the forecasting process. Over the past decade, the number of acres projected as conserved open space has increased dramatically. The regional forecast produced in 1999 estimated that one third of the region's land would be preserved as open space (approximately 850,000 acres). The regional growth forecast produced in 2012, and used as the foundation for the Regional Plan, estimates that over one half of the region's land will be preserved as open space (approximately 1.5 million acres). This is due in large part to the adoption of an updated general plan by the County of San Diego, which downzoned significant amounts of land in the unincorporated areas, and by the adoption of updated general and specific plans by urbanized cities, which upzoned land in areas close to existing and planned public transit. Since the adoption of the Regional Comprehensive Plan (RCP) in 2004, SANDAG has worked with the local jurisdictions toward a policy framework of smart growth and sustainable development. A key action has been to prepare and update a Smart Growth Concept Map that identifies approximately 200 Smart Growth Opportunity Areas in seven specific place types that promote compact, mixed use development near public transit. SANDAG's Smart Growth Incentive Program provides financial incentives for planning and capital grants that support higher-density development appropriate to the designated place type in these areas. SANDAG uses the Smart Growth Concept Map as a basis to determine eligibility for the Smart Growth Incentive Program, and the local jurisdictions use the map as a tool to update local general and specific plans. The Urban Area Transit Strategy boundary defines the service area where the region's transit agencies provide the highest frequency transit services. A large proportion of the region's proposed job and housing growth is included in this boundary area. As part of the intergovernmental review process, SANDAG provides comments on proposed development projects throughout the region focused on the land use-transportation connection. These actions, collectively, work to support smart growth and reduce sprawl in the San Diego region. 6. SANDAG does not have building permitting authority in the cities. This is the responsibility of the municipalities. However, an important element of the Regional Plan process is to account for advances in new technologies that can be incorporated into the plan to ensure the region's transportation system evolves with emerging trends. An important example of this is the investment SANDAG will be making in electric vehicle charging infrastructure. SANDAG is supporting the region's shift to adopt the use of cleaner vehicles and is making investments to support that change. 7. Regarding road pricing, the Regional Plan includes dynamic pricing for Managed Lanes, similar to what is currently in place on the I-15 corridor, to ensure optimal conditions for carpools and transit vehicles. Revenues from toll-paying customers are used to help fund public transit in the corridor. Additionally, Active Traffic and Demand Management (ATDM) is included in the Plan and builds on the Integrated Corridor Management (ICM) to dynamically monitor, control, and influence travel demand, traffic demand, and traffic flow of key highway corridors. ATDM facilitates the use of transportation alternatives through various approaches, including dynamic ridesharing, dynamic speed limits, dynamically priced parking, and predictive traveler information to improve overall highway efficiency and to maximize investment in ICM. 8. Parking pricing also is addressed in the Plan since the region has learned that proactive parking programs can support thriving commercial districts, affordable housing development, and increased choices for travelers. To that end, SANDAG, in collaboration with local jurisdictions, businesses, and other community organizations, developed the Regional Parking Management Toolbox as part of the Regional Plan. The toolbox is one of many planning and financing tools that support smart growth and sustainable development. 9. The COASTER is designed as a high speed service, which means limiting the number of stations -- that being said, a Del mar fairgrounds station is planned for special events. 	Letter

No.	Name	Agency	Comment	Response	Source
1028 Cont.	Mike Bullock and Debbie Hecht	Sierra Club San Diego		The transportation network envisioned in the Regional Plan is required by law to be based on reasonable expected revenue. The local jurisdictions' climate action plan are not. In other words, we are doing the best we can with the funds that we have – and, in fact, we exceed state targets for GHG reduction. The City of San Diego's climate action plan takes a different approach – they are setting very high goals, and with the intention of reaching those goals (but, the city does not face the same revenue constraints with its climate action plan as we do with our plan.)	Letter
1029	Bill Tippetts		<p>I am submitting these comments for inclusion in the Board's agenda for its October 9, 2015 hearing on the Regional Plan and Draft PEIR and recommend that the SANDAG Board not approve the Final Regional Plan, as revised (pursuant to the CEQA review and public comments). I have previously submitted comments on those documents as part of the CEQA public review process, and am providing additional comments to outline why the Board should not approve the Plan nor certify the EIR.</p> <p>SANDAG's decision to produce a Regional Plan that would function as both a Regional Transportation Plan and Regional Comprehensive Plan represented an innovative approach to integrate a comprehensive vision for enhancing the region's quality of life with a greatly improved transportation system. Unfortunately, the Regional Plan failed to achieve those goals. The Plan fails to provide the regional blueprint for smart growth that reduces greenhouse gas emissions to future levels necessary to meet state targets; it proposes a transportation network system that grossly under-prioritizes and underutilizes transit and active transit; and it fails to achieve the goal of SANDAG's adopted Urban Area Transit Study - to create a world class transportation system. To put the region's transportation system in perspective, based on Federal Transportation Administration/National Transit Board data for 2012, San Diego ranked 33rd in per capita transit ridership in the nation (see: http://fivethirtyeight.com/datalab/how-your-citys-public-transit-stacks-up/). And a recent report on California's major rail transit stations ranked San Diego's MTS effectiveness among the lowest, with a C-rating (http://next10.org/transitscorecard); San Diego's transit approach does not plan for and facilitate transit stations that serve as hubs of thriving, walkable areas that encourage residents and workers alike to ride the train. The Regional Plan does not propose a process and appropriate set of projects that will transform the regional transportation system from its current low transit ridership rate and effectiveness to a "world class" transit system.</p> <p>The Regional Plan significantly underplays its comprehensive planning commitment and fails to identify regional opportunities and outline potential actions that would ensure the region's quality of life: such as substantially increasing the construction of affordable housing; accelerating the pace and number of smart development projects, and identifying how the region could improve its water security (and establish strong water use reduction targets). In its current form, the plan does not provide an appropriate framework upon which the local jurisdictions can develop and implement effective climate action plans – as has been documented in comments and issue papers provided to SANDAG before and after the EIR comment period. Also, the plan fails to substantively control the region's excessive greenhouse gas emissions, which will contribute to climate change effects that will compromise billions of dollars in existing and planned inland and coastal habitat conservation investments in the region.</p>	<p>Thank you for your comments. The transit plan in the Plan would create a rich network of rail, Rapid, and local bus services that would open new areas of the region to high quality transit service (defined as high speed, high frequency), would improve regional transit connectivity, and create an all-day 10 minute frequency network of services within the Urban Area Transit boundary. Increasing the effectiveness of transit also depends on focusing new growth around existing and future transit stations; this is why the transit plan closely syncs with the Regional Smart Growth Strategy that indicates where higher density, walkable communities are planned.</p> <p>While the plan is regional in scope, SANDAG does not have jurisdiction over all regional issues; many regional issues fall under the purview of other agencies and organizations. For example, SANDAG does not directly plan for water supplies in our region, but it coordinates closely with the San Diego County Water Authority. The Water Authority prepares an Urban Water Management Plan every five years to help ensure that the San Diego region has reliable water supplies. Updates to the plan are provided to SANDAG and to local jurisdictions to consult as they develop their own land use plans and policies. The Urban Water Management Plan quantifies the mix of existing and projected local and imported supplies needed to meet future demands. It focuses heavily on water conservation, and also on the diversification of water supplies. The Water Authority is working with its member agencies to implement this diverse mix of water supplies, while also identifying changing conditions that should be reflected in the next update of the Urban Water Management Plan (scheduled for adoption in 2016). SANDAG and the Water Authority will continue to work together on addressing future water issues</p> <p>AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 required that ARB develop a Scoping Plan presenting the main strategies California will implement to reduce statewide GHG emissions to 1990 levels by 2020. ARB approved the initial Scoping Plan in 2008, and approved the first update to the Scoping Plan in 2014. The update concludes that California is on track to meet the 2020 GHG limit and is well positioned to maintain and continue reductions beyond 2020. While the update discusses setting a mid-term target between 2020 and 2050, it does not recommend any numeric post-2020 targets. Senate Bill 375 provides for a planning process to coordinate land use planning and RTPs to help California meet the GHG reductions established in AB 32. SB 375 requires RTPs prepared by MPOs, including SANDAG, to incorporate an SCS in their RTPs that demonstrates how the region would achieve GHG emission reduction targets set by ARB. On September 23, 2010, ARB adopted regional targets for major MPOs. SANDAG's current targets are per capita CO2 emission reductions from passenger vehicles of 7 percent by 2020 and 13 percent by 2035 relative to 2005 levels, and the proposed Plan meets and exceeds these targets.</p> <p>Regarding the comment about quality access to MTS rail stations, SANDAG is developing a Regional Mobility Hub Implementation Strategy to identify transportation services, amenities, and urban design enhancements that can bridge the distance between transit and an individual's origin or destination. Mobility Hub features can include carshare, bikeshare, neighborhood electric vehicles, scootershare, bike parking and support services, dynamic parking strategies, real-time traveler information, wayfinding, real-time ridesharing, and improved bicycle and pedestrian connectivity. The strategy will recommend improvements, conceptual designs, and implementation strategies for different communities served by high-frequency transit throughout the San Diego region.</p> <p>In terms of affordable housing, the Regional Housing Needs Assessment (RHNA), found in Appendix L, is updated every eight years and provides the framework for planning for housing in our region. The most recently adopted regional growth forecast and other demographic data and planning factors are used to allocate the region's very low, low, moderate, and above moderate income housing needs to all 19 jurisdictions. These housing needs are used to prepare the housing elements of local General Plans, which identify sites for housing for all income levels. Local jurisdiction housing elements also include programs that assist in the production of affordable housing for very low, low and moderate income households.</p> <p>With regard to local jurisdiction climate action plans (CAPs), as described on page 92 in the Chapter 2 of the Regional Plan, SANDAG provides technical resources and planning assistance to support local jurisdiction CAP development and implementation through the Energy Roadmap Program. SANDAG assists local jurisdictions in identifying and pursuing funding opportunities for CAP development, offers sample CAP policies, provides the necessary transportation and forecast data to support GHG emissions analyses, and facilitates collaboration through the San Diego Regional Climate Collaborative. The Climate Change Mitigation and Adaptation White Paper included as Appendix Q in the Regional Plan further describes the role that SANDAG plays in supporting local climate action.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1030	Bill Tippetts		<p>In regard to the EIR's Response to Comments, SANDAG provided less than two weeks for the public to read/assess that 714 page document. The responses identify changes that will be made to the Regional Plan, which will require the public to re-read another several hundred pages to determine whether (or how) those changes address issues raised in the comments. SANDAG has not provided sufficient time for the public to read and evaluate how the Regional Plan has been changed.</p> <p>The Response to Comments also failed to clarify certain key issues. For example, the response to comments states: "The alternatives (i.e., Alternatives 2 through 5A-D) do not reflect fiscal constraint under current and expected funding forecasts as required by state and federal transportation law because the amount of funds required would exceed the anticipated available revenues..." - which appears to be a critical reason for dismissing the alternatives. But the Response to Comments also states: "...the fact that an alternative is more costly than a proposed project or requires additional revenues does not automatically mean that it is financially infeasible...and the staff reports and Board committee transcripts contain no conclusions finding that the Draft EIR action alternatives would be financially infeasible." In addition, the Responses state that SANDAG agrees that "With the exception of certain "lock box" projects, projects included in the TransNet Extension Ordinance may be modified by a two-thirds vote of the SANDAG Board of Directors." If (because) SANDAG can modify TransNet to reprioritize projects and funding, and the need to subsequently additional funds does not disqualify an alternative, then SANDAGs argument for not selecting the Environmentally Superior Alternative is greatly weakened. In light of several independent assessments (e.g., Smart Mobility report submitted by the Cleveland National Forest and the Quickway report) that identify less-expensive ways to implement key transit elements of those alternatives, the Draft EIR incorrectly dismisses the environmentally superior alternative(s) in favor of the Proposed Project.</p> <p>For these reasons, I respectfully request that the Board postpone approval of the Plan and certification of the EIR to allow all parties to meet and discuss these concerns and make needed changes to the Plan.</p>	<p>The commenter is correct that Responses to Comments on the Draft EIR were published on September 29, 2015. On that date the responses to comments also were distributed directly to everyone that commented on the Draft EIR. In addition, staff has publicly reported on the changes between the draft and final Regional Plan several times prior to publishing the Responses to Comments on the Draft EIR. For example, the September 4, 2015, meetings of the SANDAG Transportation Comimtee⁴ and Regional Planning Committee⁵ and the September 11, 2015, meetings of the SANDAG Board of Directors⁶ included detailed reports, attachments, and oral presentations describing the changes made between the Draft and Final Regional Plan. These changes are also described in the first two pages of Final EIR Chapter 2.0.</p> <p>The comment asserts that the EIR incorrectly dismisses the environmentally superior alternative. This assertion is incorrect because the EIR does not "dismiss" Alternative 5D, the environmentally superior alternative. Rather, as required by CEQA, it identifies a potentially feasible environmentally superior alternative and compares its impacts to the proposed Plan's impacts. (CEQA Guidelines Sections 15126.6(d),(e)(2).)</p> <p>The EIR does not find that Alternative 5 or the other alternatives considered in detail are infeasible, but rather considers them as "potentially feasible" alternatives. As discussed in Master Response 1, the feasibility of alternatives is considered twice in the CEQA process. At the outset, the Draft EIR considers a reasonable range of alternatives that are "potentially feasible" (CEQA Guidelines Section 15126.6(a).) At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) makes final determinations as to the feasibility of alternatives, considering information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See Guidelines Section 15091(a)(3).)</p> <p>The EIR does disclose that feasibility of Alternative 5D would be affected by a number of factors such as the need to find additional funding or the need to change existing laws and regulations. But at the EIR stage, these factors essentially represent obstacles that would need to be overcome to implement this potentially feasible alternative. At the findings stage, the SANDAG Board's final determination of feasibility will include judgment and policy considerations. For example, to the extent that the feasibility of alternatives evaluated in the EIR depends on changes in existing laws, regulations or funding patterns for transportation improvements, the SANDAG Board will judge the likelihood that such changes will occur within the time frame for implementation of relevant elements of the proposed Plan. (See Master Response 1.)</p> <p>The Board of Directors will consider the comment to postpone Plan approval and certify the Final EIR prior to taking actions at the October 9, 2015, meeting.</p>	Letter
1031	Bruce McIntyre		<p>I urge you to approve San Diego Forward: The Regional Plan. This plan provides a balanced approach to our future growth, investing in significant improvements to the transit network and active transportation, while also ensuring that our road network will function efficiently to support our economy and new transportation technologies. By focusing our future growth in urbanized areas, the plan will support the creation of vibrant, healthy communities, and allow us to preserve our region's most valued natural resources. I hope you will join me in supporting this important plan.</p>	<p>Thanks for your review and comments on the Regional Plan. We believe that the Regional Plan includes a balanced approach to shape our region for the 21st century. The transportation projects proposed in the Regional Plan serve an overarching goal: create more transportation choices, which ultimately will lead to healthier communities, healthier people, and a healthier environment.</p>	Email

⁴ http://www.sandag.org/uploads/meetingid/meetingid_4013_19651.pdf

⁵ http://www.sandag.org/uploads/meetingid/meetingid_4025_19643.pdf

⁶ http://www.sandag.org/uploads/meetingid/meetingid_4073_19705.pdf

No.	Name	Agency	Comment	Response	Source
1032	Fanny Garvey		<p>I am disgusted at the idea of building even more freeways in San Diego. I am only 59 years old, but I am old enough to remember how the 805 freeways destroyed the canyons around my home, plowed through our neighborhood, took friends and family members away as their houses were cleared off to make way for it, and helped make the creek we swan and fished in impossible to use anymore.</p> <p>I am old enough to remember how the Coronado bay bridge took away our ferry, and our bayfront, and created a myriad of health conditions for our people.</p> <p>I am old enough to remember how walking down 47th Street to the dairy was a really nice stroll, past the homes of friends, little stores and the school. Now, the dairy is long gone, and it's extremely dangerous to walk down 47th due to the high speeds people drive getting on and off the 805.</p> <p>I'm old enough to remember walking down Chollas Creek to friends and family houses where the Home Depot shopping center now stands. There was even an old man who kept reptiles living down there that all the kids were scared of. Now, there's nothing but yet one more ugly shopping center and so much traffic it's impossible to cross the street in a car, let alone on foot.</p> <p>Likewise, wherever the 15 crosses the neighborhood it's dangerous. I am old enough to remember how it ripped up our community, paving the way for the ridiculous Costco on Market Street as well as the myriad of warehouses and other ugly industrial stuff on that street.</p> <p>That plaza was a wide open field where kids played, now it's just one more ugly shopping center, where people fly off the freeway, zoom through the neighborhood, in order to get something big at a discount.</p> <p>Now, I sit and watch as people fly by on all these freeways, oblivious to the communities that they are passing over, or through, driving. I watch as they come roaring off these freeways, ignoring posted speed limits, and continue driving at 50 or more miles an hour down Market, Imperial, Ocean View, Federal, Euclid, and 47th Street.</p> <p>When I am coming down 47th Street, I see that hideous on/off ramp coiled up in the sky like an ugly serpent over our neighborhood.</p> <p>Southeast San Diego used to be a nice family neighborhood where kids could roam, into canyons, along a creek, or up and down streets where people drove reasonably. There were never many parks but the few we had were easy to walk to and people did just that.</p> <p>We had gardens, small farms, reasonable traffic and clean air.</p> <p>Now, all that is gone. Now, there is just a bleak landscape of concrete overpasses and pylons. Now, people are getting sick from the pollution from all these freeways.</p> <p>Yet, you people want to put more of them in.</p> <p>Well, thank you for wanting this.</p> <p>This only confirms what I have always suspected: there is little or no regard for the health, the environment or the people of southeast San Diego, and has not been since the 1970s, when all of this "redevelopment" began.</p> <p>So, now you have your fairy tale little city on the bay, with its tourist-friendly facade that ends at highway 5. Is it your intention to simply continue building freeways through and over Southeast San Diego until we just get disgusted and move out, or until we just die of lung diseases?</p>	<p>It is important to note that there are no new freeway corridors planned in your area. The highway improvements are confined to implementation of Managed Lanes along the I-805 and SR 94 corridors that would give priority access to transit and carpool/vanpool users. There are also a number of transit improvements planned for your area, including: a new trolley service (Route 562, also known as the "Purple Line") that would connect San Ysidro to Kearny Mesa along the I-805/SR 15 corridors via inland Chula Vista, National City, southeastern San Diego, Mid-City, and Mission Valley; freeway Rapid Route 225 (South Bay Rapid) operating from Otay Mesa to downtown San Diego via southeastern San Diego; a network of new Rapid services (Rapid Routes 2, 10, 11, 550, 636, and 637; and upgrade of existing local bus routes to create a network of 10-minute all-day services throughout the urbanized areas of the region.</p>	Email

No.	Name	Agency	Comment	Response	Source
1033 Cont.			<p>Tell me, is that your agenda? It seems so, because that's all that will come of more freeways in southeast San Diego – more ugliness, more pollution, more health problems and more destruction of the communities there.</p> <p>You have no good reason to continue building freeways in Southeast San Diego, that is no reason that is good for us.</p> <p>But seeing as how none of you live down here, I suppose you will benefit somehow from doing this.</p> <p>I hope it will be worth the health and homes of our people, but somehow, I doubt it.</p> <p>Yours truly,</p> <p>A concerned resident of SE San Diego</p>		
1034	Kathy Effenberger		<p>I recently contacted SANDAG to inquire about future plans for Hwy 56 corridor between Fwy 5 and Fwy 15 since that is my regular commute and not only has it gotten worse recently but seeing the construction of new homes makes it nightmarish to even think how it would be supported on these roads. I was not impressed with the future plan to expand to 6 lanes by the year 2050. If I missed something other than the expansion to 6 lanes to improve the flow of traffic please let me know. I see there are future plans to improve the freeway connectors but that is also far down the road.</p> <p>I learned about the Rapid bus routes from Ted Williams/Sabre Springs to downtown and I think it was a great idea for commuters to downtown. In fact I think it would be a useful addition to have a Rapid bus route from Ted Williams/Sabre Springs to the Sorrento Valley coaster station or somewhere on Torrey Pines Road for the hwy 56 commuters and allow a BUS-ONLY use of the shoulder through the heavy traffic sections of Hwy 56 (include one stop in Rancho Penasquitos and one stop in Carmel Valley). I recall seeing a BUS-only shoulder privilege along Hwy 52 that's why I thought of this potential solution.</p>	<p>In addition to the future lanes on SR 56 included in the Regional Plan after 2035, Caltrans currently is preparing a Project Study Report (PSR) with funding from the City of San Diego's development impact fees to identify design alternatives for operational improvements along the SR 56 corridor. This is the first step in developing a funding and project implementation plan.</p> <p>In terms of Rapid bus access along the SR 56 corridor, the Regional Plan includes a Rapid route from Sabre Springs to El Camino Real and SR 56 and then to Solana Beach (Rapid Route 103). As the SR 56 freeway expansion advances, the environmental review could include a bus on shoulder alternative. While current law does not allow permanent use of a shoulder for buses along State Routes, the Bus on Shoulder Project currently being explored on State Route 94 may provide additional opportunities to employ this strategy elsewhere, including the SR 56 corridor.</p>	Email
1035	Peter Callstrom		<p>I urge you to approve San Diego Forward: The Regional Plan. This plan provides a balanced approach to our future growth, investing in significant improvements to the transit network and active transportation, while also ensuring that our road network will function efficiently to support our economy and new transportation technologies. By focusing our future growth in urbanized areas, the plan will support the creation of vibrant, healthy communities, and allow us to preserve our region's most valued natural resources.</p> <p>I hope you will join me in supporting this important plan. Thank you for your consideration.</p>	<p>Thank you for your review and comments on the Regional Plan. We believe that the Regional Plan includes a balanced approach to shape our region for the 21st century. The transportation projects proposed in the Regional Plan serve an overarching goal: create more transportation choices, which ultimately will lead to healthier communities, healthier people, and a healthier environment.</p>	Email
1036	Rex Plummer		<p>I urge you to approve San Diego Forward: The Regional Plan. This plan provides a balanced approach to our future growth, investing in significant improvements to the transit network and active transportation, while also ensuring that our road network will function efficiently to support our economy and new transportation technologies. By focusing our future growth in urbanized areas, the plan will support the creation of vibrant, healthy communities, and allow us to preserve our region's most valued natural resources. I hope you will join me in supporting this important plan. Thank you for your consideration.</p>	<p>Thank you for your review and comments on the Regional Plan. We believe that the Regional Plan includes a balanced approach to shape our region for the 21st century. The transportation projects proposed in the Regional Plan serve an overarching goal: create more transportation choices, which ultimately will lead to healthier communities, healthier people, and a healthier environment.</p>	Email

No.	Name	Agency	Comment	Response	Source
1037	Brad Barnum	Associated General Contractors of America, Inc.	<p>The Associated General Contractors is a strong advocate for investing in the region's infrastructure, and we support San Diego Forward for its balanced approach. County voters overwhelmingly supported the extension of the ½ cent TransNet sales tax in 2004, where the revenue is dedicated to local streets and roads, highways, transit, and the environment. San Diego Forward continues the march towards an effective and efficient transportation network.</p> <p>Thank you for your consideration, and we hope you vote "yes" for San Diego Forward.</p>	<p>Thank you for your review and comments on the Regional Plan. We believe that the Regional Plan includes a balanced approach to shape our region for the 21st century. The transportation projects proposed in the Regional Plan serve an overarching goal: create more transportation choices, which ultimately will lead to healthier communities, healthier people, and a healthier environment.</p>	Email
1038	Colin Parent	Circulate San Diego	<p>Letter from Circulate San Diego - Regional Transit Oriented Development Strategy:</p> <p>1. It is more important than ever for SANDAG to create a meaningful TOD policy. Local governments in San Diego have made great strides focusing land uses near our region's transit investments.</p> <p>However, more work is needed. In 1990, SANDAG projected multi-family housing to make up 52 percent of new development. In 2013, after local governments made different land use decisions, 82 percent of future development is projected to be multi-family. This change demonstrates the vital need for a useful TOD policy.</p> <p>2. The San Diego region must focus on TOD to remain competitive for Federal and State transportation funding.</p> <p>As outlined in Circulate San Diego's report TransNet Today, Federal and state sources of funding are increasingly shifting toward large competitive grant structures. The State Cap-and-Trade funds, and Federal TIGER Grants are two significant examples.</p> <p>These programs require applicants to show that transportation investments will serve adequate population densities, and will provide sufficient return on investments. For the San Diego region to remain competitive for these types of funding, SANDAG must help localities prepare for TOD.</p> <p>3. Circulate San Diego appreciates the efforts to create a timeline for implementing elements of a TOD Strategy.</p> <p>Circulate San Diego wrote earlier to express our concern that the initial draft of SANDAG's TOD Strategy presented by SANDAG staff at the SANDAG Technical Working Group (TWG) on Thursday July 9, 2015, contained no actionable policy changes.</p> <p>In response, SANDAG staff prepared an updated document which included "Key Early Actions," to be completed this year or in upcoming years. With each of the eight recommended actions, parties responsible for taking the lead are listed. These include SANDAG, local jurisdictions, transit agencies, and developers.</p> <p>Among the eight early action items is the recommendation to develop a TOD readiness tool to "evaluate the readiness of TOD sites and districts." This has continuously been supported by San Diego planners and developers in order to evaluate areas' TOD readiness, including market demand, parking ratios, connectivity to transit and other important gauges. Circulate San Diego supports this recommendation as a means to develop a scoring mechanism for a new or modified TOD grant program.</p>	<p>1. The Regional TOD Strategy brings together in one place the strategies and actions that SANDAG, local jurisdictions, transit agencies, and developers need to undertake to facilitate TOD in the San Diego region, and identifies who is responsible for them. Because of the work SANDAG and local jurisdictions have done over the past decade or more, the region is well positioned to see more TOD built in the future. In fact, TOD related projects are being built throughout the region in conjunction with existing transit now.</p> <p>2. The Regional TOD Strategy and the actions taken by local jurisdictions to change their land use plans around transit stations contribute to making the San Diego region competitive for transportation investments. The Regional TOD Strategy and the new transit lines proposed in the Regional Plan to serve the highest density residential and employment areas in the region will help facilitate more development in transit oriented districts making the region more competitive for state and federal grants.</p> <p>3. SANDAG appreciates the acknowledgement by Circulate San Diego of the Key Early Actions and its commitment to work with SANDAG and the other agencies to help implement these actions, including the TOD readiness tool.</p> <p>4. SANDAG has identified support of the Affordable Housing and Sustainable Communities Program funded by cap-and-trade funds as a Key Early Action. The San Diego region was successful in the first round- receiving more than our population share of the funds available. The San Diego region received over \$16 million, 13% of the funds available while our population makes up only 8% of the state's population. In contrast, the Los Angeles region makes up 50% of the state's population and received just \$27.5 million, 22% of the funds available. SANDAG worked closely with all the applicants in the first round of funding. Coleen Clementson, Principal Planner has been the SANDAG staff member coordinating with the applicants and the Strategic Growth Council and is the point-person for support and technical assistance associated with this program. We are working with the Regional Planning Technical Working Group and Regional Housing Federation and its member developers on making sure that the San Diego region is well-positioned to compete for these funds.</p> <p>5. SANDAG continues to look for opportunities to supplement the Smart Growth Incentive Program. In addition, the strategy recommends that local jurisdictions use their TransNet Local Street and Road funds and capital improvement programs to focus funding in transit oriented districts. With respect to studying how to include more affordable housing on land owned by MTS and NCTD, the strategy recommends that local jurisdictions continue to use their housing elements to focus affordable housing programs and resources in transit oriented districts and that transit agencies and local jurisdictions consider using underutilized or surplus land near transit for affordable housing.</p> <p>6. The development of the Regional TOD Strategy brought together national experts, the local jurisdictions, transit agencies, community members and development community to identify strategies and actions that the region can take to facilitate TOD. This effort included identifying existing conditions, issues and barriers to TOD, and actions that should continue to be taken and those that the region should consider to get more TOD projects and districts built in throughout the region.</p> <p>7. See the response to comments 4 and 5.</p> <p>8. We look forward to working with stakeholders as SANDAG, the local jurisdictions, transit agencies, and developers implement the strategies and actions in the Regional TOD Strategy.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1038 cont.	Colin Parent	Circulate San Diego	<p>Overall, the Key Early Actions represent an improvement to the original draft strategy. Circulate San Diego is committed to working with SANDAG and other agencies in the San Diego region to help implement these early actions.</p> <p>4. SANDAG should adopt a Key Early Action to provide a point-of-contact for the Affordable Housing and Sustainable Communities program</p> <p>SANDAG should supplement the Key Early Actions list for the TOD Strategy to include identification of a point person for the Affordable Housing and Sustainable Communities program. Recent press coverage from the Voice of San Diego noted that the San Diego region received relatively few dollars from California's Affordable Housing and Sustainable Communities program, an element of the state's cap-and-trade funding. While the state program could possibly be updated to favor San Diego, SANDAG can also help projects be competitive.</p> <p>SANDAG can help address this issue by identifying a point-person that members of the public, project sponsors, and developers of affordable homes can contact if they seek support and technical assistance with making applications to the Affordable Housing and Sustainable Communities program. SANDAG should also include the availability of this point person in their annual work plan, so that adequate staff resources are made available. This will help ensure that San Diego receives its fair share of the state's program funds.</p> <p>Adequate support from SANDAG is crucial to the success of applications from the San Diego area. Affordable Housing and Sustainable Communities applications require participation and review by the region's Metropolitan Planning Organization, and if SANDAG does not provide adequate staffing and information about those resources, then the San Diego region will continue to lose out on its fair share of funding.</p> <p>5. The TOD Strategy should include more funding for Smart Growth Incentive funds, and a commitment for a study on how to include affordable homes on the land owned by MTS and NCTD.</p> <p>Missing in the list of Key Early Actions is the expansion of SANDAG's existing Smart Growth incentives Program. Also missing is funding to help the two local transit agencies, MTS and NCTD to study how to make their lands more easily available for development as affordable homes. As has been recently reported in the press, current policy by the transit agencies result in zero preference for affordable homes, jeopardizing the success of ridership growth and the transit agencies themselves.</p> <p>These two options would make available more resources for cities to meet their various and diverse smart growth goals, and to help cities achieve the affordable housing goals in their housing elements.</p>		Letter

No.	Name	Agency	Comment	Response	Source
1038 cont.	Colin Parent	Circulate San Diego	<p>6. The process for adopting a TOD Strategy was flawed, and it should be a lesson for SANDAG moving forward</p> <p>While Circulate San Diego does appreciate the commitment by SANDAG to undertake some Key Early Actions, it is important for the SANDAG board to recognize that these "Key Early Actions" do not commit SANDAG to actually changing or implementing policy.</p> <p>In 2011, SANDAG committed to implement a TOD policy, as a part of the adoption of the 2011 Regional Transportation Plan. Four years later, SANDAG is poised to adopt a document that does not, by its own terms, change or update any element of SANDAG's policy. It commits only to examine policy changes, pushing the ultimate resolution of a meaningful policy back yet another year. At best, SANDAG will have spent five years, and \$444,809 of the public's funds, adopting a policy. At worst, in the coming year SANDAG may choose to change no policies, and that \$444,809 will have been wasted entirely.</p> <p>This process for adopting a TOD Strategy undermines SANDAG's credibility and resulted in a policy document that brings into question SANDAG's commitment to advancing TOD in a meaningful way.</p> <p>7. SANDAG's TOD Strategy can still be improved.</p> <p>Despite our dissatisfaction with the TOD Strategy, Circulate San Diego would be willing to support the document, as written, if it were paired with a good faith commitment from SANDAG to do two things:(1) Identify a point-person and staffing resources to help applicants with the Affordable Housing and Sustainable Communities program, and(2) Fund a study for how MTS and NCTD could make land available for affordable homes.These commitments would help advocates and the public believe that SANDAG were truly committed to making meaningful policy changes in the course of the next year when it seeks to implement the Strategy's "Key Early Actions."</p> <p>8. Conclusion</p> <p>We look forward to continuing to work with SANDAG to implement the Key Early Actions identified in the Draft TOD Strategy. Circulate San Diego is committed to the success of sustainable growth for the San Diego region.</p>		Letter

No.	Name	Agency	Comment	Response	Source
1039	Kathleen Ferrier	Circulate San Diego	<p>Circulate SD would like to offer these comments on the Regional TOD Strategy to facilitate inclusion of creative placemaking as a component to TOD. Creative placemaking can be seen as an arts-based extension of the work of transportation and urban planning practitioners to develop new techniques for engaging communities, mitigating impacts on affected neighborhoods and expanding community benefits, especially to better reflect and celebrate local culture, heritage and values.</p> <p>Summary of Recommendations</p> <p>1. Support core areas within transit oriented districts with a compact, and highly interconnected diversity of land uses and activities consistent with the land use targets in SANDAG's Smart Growth Concept Map, allowing for different housing types at varied densities with a range of price points, and public amenities that celebrate local culture and heritage.</p> <p>3. Promote Extend walking and biking routes within transit oriented districts to bridge the first-last mile gap. Walking and biking can extend the catchment areas around a transit station to provide connections to and from home and work, without the need for a car, and allow more people to take transit. For walking and biking to be viable ways of accessing transit stations, infrastructure improvements may be needed to provide enhanced access to transit that is safe and convenient</p> <p>5. Engage a broad range of stakeholders in the planning and design of transit oriented districts and support methods for public involvement, such as the integration of art into the outreach process for creative placemaking. SANDAG can continue its role in presenting examples of successful TODs within and outside the region, including field trips to exemplary districts and the ongoing Smart Growth Outreach program; produce a testimonial on-line video program of people who use transit, live and work in TODs, and are employers in TODs, and consider exploring national models for mediating design and planning conflicts with non-governmental organizations (NGOs) in the region to provide mediation and conflict resolution services.</p> <p>(page 52) Strategy #1. Ensure that core areas within transit oriented districts have a compact, diverse, and highly interconnected range of land uses and activities, consistent with targets identified in SANDAG's Smart Growth Concept Map, allowing for different housing types at varied densities with a range of price points, and public amenities that celebrate local culture and heritage.</p> <p>The urban form of transit oriented districts districts is different in each transit oriented community. A mix of land uses surrounding a transit station can facilitate more housing, access to employment, and neighborhood serving retail to support people living and working nearby. Public open space, civic and institutional uses, and other special use centers also provide opportunities to reflect and celebrate local culture and heritage, establishing strong anchors for transit oriented districts. Parcel configuration, block size, building massing, scale of buildings in relation to the street and people, and the amount of parking relative to active street frontage, and other factors are critical to the success of transit oriented districts.</p>	<p>Thank you for your interest in the Regional TOD Strategy (Strategy). Placemaking is woven throughout the Strategy. The Strategy does not preclude your suggested inclusion of creative placemaking, art, culture and local heritage as part of TOD in the San Diego region. Specifically, the Strategy recognizes the importance of individual communities and that transit oriented development must reflect and respect the unique character of the local community. Similarly, the Strategy would not preclude local jurisdictions from utilizing biking and walking as mitigation factors in TOD CEQA analysis.</p>	Letter

No.	Name	Agency	Comment	Response	Source
1039	Kathleen Ferrier	Circulate San Diego	<p>Increasing the number of people that live and work near transit provides more people with convenient access to transit. At the same time, as more people live and work near transit, ridership will increase. Planning policies and regulations that shape urban form, density, and land use, including zoning codes, engineering standards, and design guidelines can have a significant influence on transit oriented districts.</p> <p>Strategy #3. PromoteExtend walking and biking routes within transit oriented districts to bridge the first-last mile gap.</p> <p>Walking and biking can extend the catchment areas around a transit station to provide connections to and from home and work, without the need for a car, and allow more people to take transit. For walking and biking to be viable ways of accessing transit stations, infrastructure improvements may be needed to provide enhancedensure access to transit that is safe and convenient.</p> <p>Actions to Continue:</p> <p>Supporting the implementation of the Regional Complete Streets Policy as part of the development of all SANDAG transportation infrastructure projects.15 (SANDAG)</p> <p>Actions to Consider:</p> <p>Adapting thresholds for significance established for compliance with CEQA to include reflect walking and biking access; and use exemptions and streamlining to implement infrastructure improvements for walking and biking.</p> <p>Strategy #5. Develop tools, techniques, and resources to engage a broad range of stakeholders and perspectives in the design and planning of transit oriented districts. No two transit oriented districts in the San Diego region are the same, and each one will continue to evolve into a distinct place, based on the cultural history and heritage. Public participation is critical for the success of transit oriented districts and can help ensure that opportunities and constraints within each transit oriented district are reflected in plans, policies, and regulations that apply to development projects in transit oriented districts. Public participation can help ensure that urban form, density, and height are compatible with the surrounding community and its cultural heritage, while still allowing incremental and context sensitive growth.</p> <p>Actions to Consider:</p> <p>Seeking funding to develop an outreach and information program that could include videos, social media, internet tools, traditional public meetings, and other platforms such as creative placemaking to showcase the benefits of transit oriented districts highlighting places near transit, testimonials of users of transit, examples of integrated arts components, people who live and work in transit oriented districts, and major employers located in transit oriented districts. (SANDAG, Local Jurisdictions, Transit Agencies)</p>		Letter

No.	Name	Agency	Comment	Response	Source
1039 cont.	Kathleen Ferrier	Circulate San Diego	<p>Strategy #7. Explore opportunities to streamline CEQA guidance and processes.</p> <p>Actions to Consider:</p> <p>NEW: Create Regional Traffic Impact Study Guidelines to offer guidance to cities on legislative updates related to adapting thresholds for significance and calculating for Vehicle Miles Travelled. (SANDAG)</p> <p>Strategy #8. Update transportation impact methodology.</p> <p>Actions to Consider:</p> <p>Updating local CEQA significance criteria with the focus toward VMT-based thresholds and inclusion of walking and bicycling mitigation factors. (Local Jurisdictions)</p> <p>Strategy #9. Paying for community facilities and infrastructure</p> <p>Actions to Consider:</p> <p>Developing facilities financing plans that identify sources of funding for improving, or increasing the capacity of, infrastructure, parks and open space, necessary services, and other public realm improvements such as creative placemaking within transit oriented districts. (Local Jurisdictions)</p>		Letter