Responses to Late Comments
Received on the Final EIR
SANDAG Board of Directors
401 B Street, Suite 800
San Diego, CA 92101

Re: 2021 Regional Plan and Environmental Impact Report

SANDAG Board Members:

Save Our Forest and Ranchlands (SOFAR) and the Cleveland National Forest Foundation (CNFF), two organizations dedicated to progressive land use planning and the protection of vital natural resources, submit this letter in connection with the 2021 Regional Transportation Plan (Plan or RTP) and its Environmental Impact Report (EIR).

San Diego faces a triple emergency: a climate crisis, a housing crisis, and an ecological crisis all at once. We need to change the way we’ve done things in this county, and we need to do it now. It is for this reason that CNFF and SOFAR have been vehemently advocating for a sea change in the region’s approach to transportation. With each iteration of the RTP over the last twenty years, we have offered alternative approaches to transportation, explaining that we cannot respond to this emergency without a dramatic and immediate shift to public transportation. The 2021 RTP offers a step in the right direction but it is not enough to address the unprecedented crisis we are facing.

When SANDAG was preparing its transportation network scenarios for the 2021 RTP, we prepared an alternative to the RTP. (See May 26, 2021 letter to the Board of Directors). We requested that SANDAG evaluate the merits of this alternative—referred to as the Climate, Housing, and Transit (CHT) Alternative—because it is capable of meeting the region’s housing, vehicle miles traveled (VMT) and greenhouse gas (GHG) reduction goals that have been set collectively by the state of California, the City of San Diego, and SANDAG. (See October 7, 2021 letter to SANDAG). Critically, the CHT Alternative would also reduce the RTP’s significant and unavoidable VMT and GHG-related impacts. Rather than seriously study its merits, the DEIR and the FEIR mischaracterize key components of the Alternative. Like every other alternative SOFAR and CNFF have presented to SANDAG over the last two decades, SANDAG has rejected the CHT Alternative from serious consideration.
For the reasons discussed in our prior letters and as we explain below, SANDAG’s refusal to consider the CHT Alternative is both improper and unsupported. Moreover, because the EIR fails to include an alternative that would result in a meaningful reduction in VMT, the FEIR fails to remedy the deficiency identified by the California Court of Appeal in Cleveland National Forest Foundation v. San Diego Association of Governments. (17 Cal.App.5th 413, 435-437 (2017)). For these reasons, the FEIR fails to comply with the California Environmental Quality Act (CEQA).

The FEIR Fails to Adequately Analyze the CHT Alternative and Therefore Lacks a Legal or Factual Basis For Rejecting This Alternative.

The FEIR rejects the CHT Alternative claiming that the proposed Plan and Alternative 3 (All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies) align with many of the elements of the CHT Alternative. (FEIR, p. P1-6). The FEIR further asserts that the CHT Alternative would achieve commensurate reductions in VMT and GHG emissions compared to Alternative 3. (FEIR, pp. P1-396; P1-408). This is incorrect. In reaching this determination, the FEIR purports to have relied on “data from model runs.” (FEIR p. P1-396). The FEIR does not identify the model, disclose its technical assumptions, or describe the “model runs.” Nor does the FEIR include the modeling output data. Without any of this information, neither the public nor decisionmakers can verify the accuracy of the FEIR’s conclusory assertions.

In addition, it seems implausible that Alternative 3 could achieve reductions in VMT and GHG emissions equivalent to those of the CHT Alternative. The CHT Alternative is premised on building a regional mobility system, beginning with a foundational first-phase area-complete transit, bike, and walk system in the urban core that is competitive with the automobile (i.e., that achieves at least a 50% transit, bike, and walk mode share in the urban core area). Although the EIR does not identify mode share statistics for the urban core or within Mobility Hubs, and it is therefore impossible to conduct a direct comparison of the Plan, Alternative 3 and the CHT Alternative, it seems evident that neither the proposed Plan nor Alternative 3 would achieve anything close to the mode share statistics identified in the CHT Alternative. This is because the Plan would achieve a modest 5% transit mode share in 2050, while Alternative 3 would achieve a 6% transit mode share. (DEIR Appendix T (Table T6: Supporting Measure) and FEIR, Table O-2, Appendices A-O, p. 687 of 3384).

Moreover, as we have explained, the CHT Alternative does not include any roadway or freeway projects because building a real regional transit network will require all the region’s transportation investment dollars for the foreseeable future. Unlike the CHT Alternative, the proposed Plan and Alternative 3 include an identical transportation network, which calls for a massive increase in road and freeway projects. The FEIR would have us believe that the Plan’s freeway projects are limited to Managed Lanes and that these Managed Lanes will not be new lanes, but rather will convert General Purpose lanes and shoulders to facilitate additional transit and HOV travel. (FEIR p. P1-391 (response 35-3)). Based on this assumption, the FEIR goes so far as to state that in 2050 there would be more lane miles of General Purpose lanes under the CHT Alternative than under the proposed Plan. (FEIR p. P1-403 (response 35-14)). This conclusion is preposterous.
As transportation expert Norm Marshall explains, the FEIR misrepresents the proposed Plan. (See Memorandum from Norman Marshall, Smart Mobility (“Smart Mobility Memo”) to D. McFetridge, December 7, 2021, p. 1, attached). The FEIR clearly shows that there would be no reduction in General Purpose lanes under the proposed Plan. In fact, the Plan would result in an increase in General Purpose lanes. (See Smart Mobility memo, p. 1, citing to FEIR Table A.1 (Revenue Constrained Projects), Volume 2, Appendix A (Transportation Projects, Costs, and Phasing), pdf p. 702 of 3384).

Moreover, as we explained above, and as the FEIR clearly acknowledges, the CHT Alternative includes no roadway improvements. (FEIR, p. P1-403). Therefore, the number of General Purpose freeway lanes under the CHT Alternative should be equal to the number of General Purpose lanes in the existing transportation network. If the CHT Alternative network was modeled with more General Purpose lanes than the proposed Plan’s roadway network—as implied by the FEIR—the modeling is invalid and the conclusion that the CHT Alternative would result in equivalent VMT and GHG reductions to the proposed Plan is also invalid. (Smart Mobility Memo, p. 2).

Neither the RTP Nor its Alternatives Result in a Substantial Reduction in VMT.

The FEIR, like the DEIR, fails to consider an alternative that substantially reduces VMT. The FEIR states that it is “infeasible” for SANDAG to reduce VMT below existing levels. (See Response 35-12, p. P1-400). The document lacks sufficient factual support for this claim. The FEIR asserts that reducing VMT would require State and federal legislative changes, including changes in state road pricing policy, land use policies and parking policies. (FEIR p. P1-400). The FEIR never discloses the specific legislative changes that would be required to produce a plan that reduces VMT. Nor does the FEIR explain any action that SANDAG has taken to pursue these legislative changes. The FEIR also does not identify the specific land use policies or parking policies that would be required to result in a reduction in VMT. Nor does it provide any explanation as to whether SANDAG has taken any action to advocate for such policy changes.

The FEIR also asserts that there are regulatory constraints on directing roadway funds to transit. (FEIR pp. P1-400, P1-401). Once again, the document fails to identify the specific regulatory changes that would be required to produce a transportation plan that substantially reduces VMT. For example, if there are funding restrictions that prevent major shifts in funding from highway projects to transit, the FEIR must provide detail regarding these restrictions. Here, the FEIR simply mentions certain funds that are purportedly restricted (e.g., SHOPP funds), but it does not describe the nature of these funds nor their restrictions. Nor does the document make any attempt to explain whether SANDAG has made any effort to investigate other sources of funding that could facilitate increasing transit in the region.

Again, the reason that neither the RTP nor Alternative 3 results in a substantial reduction in VMT is because both call for $50 billion in roadway expenditures. As SANDAG is well aware, projects that increase roadway capacity will continue to exacerbate far-flung sprawl development, which in turn will increase VMT. Alternative 3 calls for more progressive value pricing and user fee policies (DEIR, p. 6-7), yet its transportation network is identical to that of
the proposed Plan. SANDAG certainly could have crafted Alternative 3 to use those progressive funding sources to fund transit rather than highways. Similarly, Alternative 3 could have assumed that SANDAG passes a sales tax revenue measure that earmarks substantially more dollars to transit than roadway projects.

Constructing the Managed Lanes Component of the RTP Will Likely Make It Impossible to Achieve the Plan’s VMT Goals.

The FEIR asserts that the RTP proposes a land use scenario that accommodates the Regional Housing Needs Assessment and, when combined with the transportation system, would allow the region to meet its SB 375 GHG reduction target. (FEIR, Response 35-3. p. P1-393). We applaud SANDAG for its use of an RTP land use scenario that relies on the Series 14 Regional Growth Forecast. The Series 14 Growth Forecast involves a major shift of planned housing units from rural to urban areas. (FEIR, p. P1-70).

Despite its forward-thinking land use scenario, however, the RTP’s proposed roadway network continues to be auto-dominated as is evidenced by its reliance on Managed Lanes. SANDAG asserts that these Managed Lanes are critical because they support transit. (FEIR, p. P1-46). However, constructing roadway projects that may serve transit is clearly not as beneficial as directly funding transit infrastructure and transit operations. As the Smart Mobility Memo explains, the RTP’s emphasis on Managed Lanes is nothing more than an outdated enormous road construction plan that will result in increases in VMT and GHG emissions. (Smart Mobility Memo, p. 4). This is because Managed Lanes will induce additional auto-based travel. Mr. Marshall determined that the RTP’s Managed Lanes could generate an additional 4,300 million VMT per year. (Smart Mobility Memo, p. 4). This equals 13% of the total regional VMT that the FEIR estimates for 2050 with the proposed Plan. Id. Thus, constructing the Managed Lanes component of the RTP would likely make it impossible for the region to achieve the RTP’s VMT reduction goals. (Id.)

SANDAG could help municipalities achieve the Series 14 allocations by shifting all transportation spending towards transit and non-motorized (walk and bike) infrastructure. This is precisely what the CHT Alternative does.

SANDAG Can and Should Do More Regarding Land Use.

While we understand that SANDAG does not have land use authority and that local jurisdictions are responsible for decisions regarding development projects, there are actions SANDAG can and should take to ensure that the RTP achieves substantive VMT reductions. First, there are tremendous opportunities associated with the Series 14 Forecasts. While some jurisdictions rely on Series 14, others do not. For example, had San Diego County relied on the Series 14 Forecasts, it would have used reduced growth predictions for ongoing community plan updates. If the County continues to approve massive increases in residential development in remote areas, there is no chance the region will be able to achieve the RTP’s targeted VMT reductions. Shifting population growth to the cities in the County would not just shift VMT from one place to another, it would reduce total VMT because of the lower average VMT per household in cities.
Consequently, in order to achieve real VMT and GHG reductions, there are several actions SANDAG must take. First, SANDAG must convince jurisdictions of the importance of adopting the Series 14 Forecasts. To this end, SANDAG could limit or restrict altogether funding for local jurisdictions’ transportation projects unless these jurisdictions have adopted and are using the Series 14 Forecasts to guide their land use planning. Relatedly, SANDAG intends to embark on developing a Regional Housing Incentive Program that will support jurisdictions in the development and adoption of policies to accelerate housing production in urbanized locations in the County. (FEIR, p. P1-10). As part of this Program, SANDAG should provide grant funding only for those jurisdictions that use the Series 14 Forecasts. Moreover, because it is critical to focus growth in Mobility Hubs, SANDAG should withhold grant funding for any transportation projects located outside of Mobility Hubs.

**The FEIR Fails to Resolve the RTP’s Reliance on Speculative Funding Sources.**

In our previous letter, we criticized the RTP’s reliance on speculative funding sources, explaining that there was no assurance that the Plan’s transit projects would be funded. The FEIR responds by stating that the State is currently studying implementation of a road user charge and that it would be unreasonable for SANDAG to disregard the State’s actions. (FEIR p. P1-397). Now, just days before the RTP is slated for consideration by the SANDAG Board of Directors, the Board is being “asked to consider whether to direct staff to immediately begin evaluation of a potential update to the 2021 Regional Plan for Board consideration, including evaluating alternatives to the regional road usage charge program in light of the availability of new federal transportation funding.” (Board December 10, 2021 Agenda, p. 3). Any decision to revise a key funding component after approval of the RTP makes the funding for the RTP even more speculative and uncertain. In our view, road usage fees could be implemented more equitably and effectively than gas or sales taxes. The Board should resist this proposal to immediately start undermining the mix of funding sources for the Plan, which is already speculative enough.

**Conclusion.**

For the reasons discussed above, the FEIR improperly rejects the CHT Alternative and fails to set forth an alternative that substantially reduces VMT. For these reasons, the FEIR fails to comply with CEQA.

Sincerely,

Duncan McFetridge
Director, CNFF
President, SOFAR

Attachment: Smart Mobility Memorandum
Memorandum

To: Duncan McFetridge, CNFF and SOFAR
From: Norman Marshall
Subject: SANDAG 2021 Regional Plan FEIR
Date: December 8, 2021

I have reviewed key aspects of SANDAG’s 2021 Regional Plan Final Environmental Impact Report (FEIR) response to SOFAR’s and CNFF’s Climate, Housing, Transit (CHT) Alternative and conclude:

1) The FEIR misrepresents the number of freeway general purpose lanes in both the proposed Plan and the SOFAR/CNFF alternative – therefore the modeling comparison is invalid.

2) The FEIR indicates that the proposed Plan would result in a reduction in vehicle miles traveled (VMT) per capita of 15.4% in 2050 relative to the base year 2016. However, these reductions are predicated on an assumed major shift towards compact walkable urban development that the proposed Plan undermines by continuing a failed policy of highway expansion.

3) Constructing the managed lanes in the proposed Plan would increase regional VMT and greenhouse gas emissions by at least 10% relative to an alternative without the managed lanes program. If the SANDAG model does not show this; the model has significant problems.

The FEIR states:

Where possible, rather than adding new roads, the proposed Plan repurposes general purpose lanes or shoulders to create Managed Lanes. (Appendix P, p. P1-403)

This statement misrepresents the proposed Plan. In the Managed Lanes/Toll Lanes Projects section of the Revenue Constrained Projects list (Appendices A-O p. 702 of 3384), there are no road segments where there is a reduction in general purpose lanes. Therefore, the statement that general purpose lanes are repurposed is simply wrong. There are, in fact, three segments with increases in general purpose lanes in addition to the managed lanes:

- I-5 between SR 54 and SR 15 increasing from 8 to 10 general purpose lanes,
- SR 15 from I-5 to SR 94 increasing from 6 to 8 general purpose lanes, and
- SR 125 from SR 94 to I-8 increasing from 8 to 10 general purpose lanes.

The statement that shoulders are repurposed is misleading. Many of the projects add four managed lanes which clearly goes beyond shoulder conversion and adds significant width. Even in those projects where shoulder lanes are converted, added width is necessary to meet minimal safety requirements. The actual cross sections for these managed lanes will not be known until designs are completed. The FEIR assumes a standard cross section of 12-foot shoulders on both sides plus a 4-foot buffer lane for calculating impacts. (p. 4.2-19 – 4.2-20) This represents an additional 32 feet of pavement width with two managed lanes and an additional 54 feet of pavement width with four managed lanes.

Regarding SOFAR’s comment letter, the FEIR states:

In 2050, under the proposed Plan, the region has 2,122 miles of general-purpose freeway lanes (including auxiliary lanes) due to existing lane conversions. In 2050, under SOFAR’s proposed Climate, Housing and Transit Alternative, which includes no roadway
improvements, the region has 2,352 miles of general-purpose freeway lanes (including auxiliary lanes). (Appendix P, p. P1-403)

The FEIR gives these numbers for general-purpose freeway lanes:

- 2016: 2,415 (Table 4.16-6, p. 4.16-33)
- 2025: 2,438 (Table 4.16-6, p. 4.16-33)
- 2035: 2,223 (Table 4.16-10, p. 4.16-38)
- 2050: 2,122 (Table 4-16-14, p. 4.16-42)

The 2050 number (2,122) matches the number in the excerpt above. However, it makes no sense given that no general-purpose lanes are converted, and shoulders are not counted as lanes. The FEIR appears to imply that the reduction is caused by converting auxiliary lanes to managed lanes despite never stating this anywhere. The FEIR defines auxiliary lanes as “extra lane constructed between on- and off-ramps that allows drivers a safe way to merge into traffic while also preventing bottlenecks caused by drivers attempting to enter or exit the freeway. Auxiliary lanes are short. It is impossible to eliminate hundreds of miles of auxiliary lanes from the network that would be required to make the FEIR math work. In any case, these auxiliary lanes will still be required for safety if the managed lanes are constructed and will be in the final designs – whether SANDAG modeled them or not.

A more plausible explanation is that the 2,122 number is simply wrong. In addition to the added general-purpose lanes in the three managed lanes projects listed above, he FEIR Revenue Constrained Project list includes seven other freeway expansion projects that would each add to the regional total of freeway general purpose lanes: (Appendices A-O, p. 702 of 3384)

- I-8 from 2nd Street to Los Coches from 4/6 lanes to 6 lanes,
- SR-52 from I-5 to I-805 from 4 lanes to 6 lanes,
- SR 52 from Mast Blvd. to SR 125 from 4 lanes to 6 lanes,
- SR 56 from I-5 to I-15 from 4 lanes to 6 lanes,
- SR 94 from SR 125 to Avocado Blvd. from 4 lanes to 6 lanes,
- SR 125 from San Miguel Rd. to SR 54 from 4 lanes to 8 lanes, and
- SR 125 from SR 905 to San Miquel Rd. from 4 toll lanes to 8 freeway lanes.

In the excerpt above, the FEIR acknowledges that the Climate, Housing and Transit alternative includes “no roadway improvements.” Therefore, the number of general-purpose freeway lanes should be equal to the existing network, i.e., somewhere in the range of the numbers give above for 2016 and 2025. As the number given, 2,352, is lower than either the 2016 number or the 2025 number, it also appears to be wrong. Obviously, the “no-roadway improvements” Climate, Housing and Transit alternative transportation network includes significantly fewer general purpose lane miles than the proposed Plan roadway network. If the Climate, Housing and Transit alternative network was modeled with more general-purpose lanes than the proposed Plan roadway network as implied by the FEIR excerpt, the modeling is invalid and the conclusion that the CHT alternative would result in more VMT than the proposed Plan also is invalid.
The FEIR states that one of the objectives of the RTP is to: “Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board and the SANDAG Board of Directors. (p. ES-1) This objective is to be realized, in part, through another of the EIR’s objectives: “Provide transportation investments and land use patterns that reduce vehicle miles traveled and improve air quality.” (p. ES-1)

A CARB 2019 report sets a target of reducing VMT by 14.3% by 2050. The FEIR uses this value as a threshold to evaluate whether this objective is met. (p. 4-16-47) FEIR Table 4.16-19 (p. 4.16-54) shows a reduction of 15.4% per capita between 2050 and 2016, and this reduction would meet the required threshold by a very small margin.

However, the most important reasons for the modeled reduction in VMT per capita in the proposed Plan are two other EIR objectives: “Focus population and employment growth in mobility hubs and existing urban areas to protect sensitive habitat and natural resource areas” and “Provide transportation investments and land use patterns that reduce vehicle miles traveled and improve air quality.”

The Series 14 housing and employment allocations are a positive step. However, in the past, the allocations have been aspirational but not enforced. The FEIR acknowledges that:

Mitigation regarding inducement of substantial unplanned population growth by the proposed Plan was found to be infeasible. As described in Section 4.14, SANDAG has no control over the amount of growth the region would experience during the implementation of the proposed Plan. For the same reasons, mitigation to reduce population growth in Southern California and northern Baja would also be considered infeasible. (p. 5-59)

SANDAG can help the municipalities achieve the Series 14 allocations by shifting all transportation spending towards transit and non-motorized (walk and bike) infrastructure. Freeway investment, including managed lanes projects, undermines the positive effects of the non-auto investments.
The FEIR fails to analyze induced travel that would result from freeway construction, including managed lanes. It states:

The proposed Plan includes 821 miles of HOV/Managed Lanes, which SOFAR inaccurately suggests will continue to contribute to substantial increases in VMT and GHG emissions. (Appendix P, p. P1-403)

The managed lanes represent an outdated enormous road construction plan that would certainly cause significant increases in VMT and GHG emissions. The California Office of Planning and Research published a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018). This document recommends applying an Induced Travel Calculator developed at the National Center for Sustainable Transportation at the University of California Davis. Applying this calculator to the SANDAG region, 821 lane miles of freeway would add 5700 million additional VMT per year.

There has not been enough research yet to determine whether adding managed lanes results in less induced travel than adding the same number of general-purpose lanes, but it is plausible that there would be some reduction – perhaps 25% less. In this case, the added VMT would be 4300 million per year. This equals 13% of the total regional VMT that the FEIR estimates for 2050 with the proposed plan.

Numerous comments on the EIR were made about induced travel. The FEIR response is that induced demand was dealt with in Regional Transportation Plan Appendix D Attachment 3. This 5-page document claims that induced VMT was estimated by a procedure that includes the SANDAG regional model (ABM2) in combination with the Induced Demand Calculator discussed above. However, the documentation is very questionable; it appears a series of assumptions were made including a critical one that managed lanes do not induce much travel. The document also suggests that much of the managed lanes system will be repurposed from existing general-purpose lanes which is inconsistent with the FEIR as is discussed above. The inventory of lane miles includes only 301 managed lane miles which is inconsistent with the 821 miles of HOV/managed lanes in the FEIR. The resulting estimate of induced travel is much too low – apparently due to a combination of applying too small an increase in lane miles and undocumented assumptions including managed lanes produce little induced travel.

Constructing the managed lanes program likely would make it impossible for the region to achieve the VMT reduction goals set out in the RTP. Although there is some uncertainly about the magnitude of the VMT induced by the managed lanes, it would be greater than 10% of forecast regional VMT. The assertion in the FEIR that the increase in induced VMT would not be “substantial” is preposterous. Adding managed lanes would divert traffic from congested general-purpose lanes and the general-purpose lanes would fill with traffic until they were congested again. Otherwise, there would be no reason for travelers to pay to travel in the managed lanes. If the SANDAG modeling fails to show such increases in VMT, this is just evidence of serious problems in the SANDAG modeling.

1 https://ncst.ucdavis.edu/research-product/induced-travel-calculator
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<tr>
<td>53-1</td>
<td>As explained in Master Response 1, the EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives, that are potentially feasible, and that reduce environmental impacts. The discussion also explains why the EIR was not required to consider SOFAR’s proposed Climate, Housing and Transit Alternative in detail. See responses to SOFAR’s October 5, 2021 Draft EIR comment letter, starting on p. P1-389 of the Final EIR, as well as Section 6.5.5 of the EIR, for additional discussion of the reasons for rejecting SOFAR’s proposed Climate, Housing and Transit Alternative from detailed consideration. Additional discussion regarding SOFAR’s additional concerns is provided below.</td>
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<td>53-2</td>
<td>The Final EIR accurately states that the Climate, Housing, and Transit Alternative would achieve commensurate reductions in VMT and GHG emissions compared to Alternative 3. The analysis that supports this determination relied upon data from the ABM2+ model (version 14.2.2), which was run for the CHT Alternative analysis for forecast years 2025 (Scenario ID 481), 2035 (Scenario ID 483), and 2050 (Scenario ID 484). Land Use Pattern Series 14 ID 38, referred to as the SCS build land use pattern, was used for the analysis. In configuring the network for the CHT analysis, highway networks were kept the same as the 2021 Regional Plan no build, except for general purpose lane reductions due to Rapid bus service on transit-only links. The transit networks used for the CHT model run analysis were the same as the 2021 Regional Plan no build scenario, with the addition of the accelerated completion of the Miramar Tunnel by 2035. Active transportation networks used for the CHT model run analysis were the same as the 2021 Regional Plan build scenario. Transportation policies and programs for the CHT model run analysis were set the same as the 2021 Regional Plan build scenario.</td>
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<td>53-3</td>
<td>Please refer to previous response to comment SOFAR 35-22, starting on p. P1-414 of the Final EIR, regarding this comment. As stated, by 2035, about 30.4 percent of the region’s population is projected to be living within a half-mile of a Rapid transit stop. For those living further from Rapid transit stops, the proposed Plan investments in Flexible Fleets will allow for more options to facilitate first mile/last mile connections with solutions that can be customized for different communities (microtransit, ridesharing, bikeshare, etc.). The proposed Plan also includes a land use pattern that focuses growth in Mobility Hub areas to align with transportation investments and facilitate more bikeable and walkable communities. SANDAG is working closely with the City of San Diego to ensure that the proposed Plan complements the City’s efforts to achieve the mode share goals of its Climate Action Plan. That said, with implementation of the proposed Plan, the transit mode share for all work trips increases to 11.7 percent in 2035 and 13.2 percent in 2050. However, since SANDAG is unable to confirm the metrics used in SOFAR’s original comment</td>
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<td>are feasible, the claim that 50 percent transit mode share can be achieved remains unsubstantiated, and therefore a 50 percent transit mode share was not modelled.</td>
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<td>53-4</td>
<td>As shown in Table 4.16-14 of the FEIR, the proposed Plan will result in 2,122 general purpose lanes, a reduction of 293 general purpose lane miles by Year 2050 when compared to baseline conditions. As stated in response to comment SOFAR 35-14 (starting on Final EIR p. P1-403), general purpose lane conversions to Managed Lanes contribute to these reductions. Thus substantial evidence supports the EIR’s statements that general purpose lane miles under the proposed Plan. Under SOFAR’s proposed CHT Alternative, which includes no roadway improvements, the region has 2,415 miles (the mileage of 2,352 miles stated in the previous response was an error) of general purpose freeway lanes (including auxiliary lanes). To state it clearly, since the proposed Plan results in the conversion of some general purpose lanes to Managed lanes while the CHT Alternative does not, it makes mathematical sense that the CHT Alternative has more general purpose lane miles than the proposed Plan. For a detailed discussion regarding the comments related to conversion of general purpose lanes, refer to the response to comment SOFAR 53-14.</td>
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<td>53-5</td>
<td>Response to comment SOFAR 35-12 starting on Final EIR p. P1-400, as well as Final EIR Master Response 1, present detailed reasons why SANDAG did not consider an alternative that would substantially reduce VMT below existing levels. The comment letter does not provide any evidence that SANDAG could feasibly implement further measures that could achieve substantial reductions in VMT. SANDAG will continue to coordinate with applicable State, regional, and local agencies, organizations, and stakeholders to further measures that would substantially reduce VMT, but it is well beyond the jurisdiction of SANDAG to propose or implement these alone. Among the five reasons mentioned in Master Response 1 is that SANDAG cannot control the total regional population growth that is the main cause of total VMT increases. As SANDAG modeling indicates, population growth is the main driver of future VMT growth. Alternative 3 would result in VMT per capita of 15.6 (home-based) compared to the proposed Plan VMT per capita of 16.03 in 2050. Alternative 3 would result in a total VMT increase of 2,756,715 miles per day in year 2050, which is approximately 39 percent lower than the proposed Plan (total VMT increase of 4,519,230 miles per day in year 2050). Population growth under the proposed Plan, however, increases by 13 percent. Even with decreases in driving per capita, under Alternative 3 total VMT still increases by 3.2 percent compared to 2016 because population growth outpaces driving reductions. As courts have noted, “CEQA is not intended as a population control measure” (Center for Biological Diversity v. Department of Fish &amp; Wildlife (2015) 62 Cal.4th 204, 220). With the proposed Plan, SANDAG has included multiple policies to reduce VMT, including the development of Mobility Hubs that focuses land use growth around transit centers and has developed a Parking Strategies for Smart Growth guide that provides example policies on how jurisdictions can implement smart growth parking policies and programs.</td>
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| 53-6       | Refer to response to comment SOFAR 53-5 above.  
Regarding SHOPP funds, it was stated in response to comment SOFAR 35-16 in the Final EIR that those funds are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans. As such, they cannot be reallocated for transit projects. In addition, Transit Leap services are substantially supported by Managed Lanes in the proposed Plan, and consequently any reallocation of resources away from highway investments would severely limit the ability to provide quality high speed transit services on those corridors.  
The State is currently studying implementation of a road user charge, and it would be unreasonable for SANDAG to disregard the actions at the State-level that would directly impact anticipated revenue during the period covered by the proposed Plan. The proposed Final Plan now assumes collection of both the State and regional road usage charges would begin by 2030. As a near-term action, SANDAG will launch a study in FY 2022 to evaluate different transportation funding sources, and a working group would oversee the development of a comprehensive value pricing and user fee implementation strategy that supports the goals of the proposed Plan. |
| 53-7       | Please refer to response to comments SOFAR 53-4 and 53-6 for responses regarding the Managed Lanes and funding comments, respectively.  
For a detailed response to the comments regarding induced demand, refer to response to comment SOFAR 53-19 below.  
Regarding VMT reduction goals, refer to response to comment SOFAR 53-5 above. |
| 53-8       | While land use authority is reserved to local jurisdictions—the 18 cities and the County—SANDAG will work closely with jurisdictions to incentivize building of housing in the Mobility Hub areas. SANDAG has no authority to force local jurisdictions to implement the Series 14 Growth Forecast that serves as the basis for the Regional Plan’s Sustainable Community Strategy. Nothing in SB 375 requires a city’s or county’s land use policies and regulations to be consistent with the regional transportation plan. |
| 53-9       | No changes to funding sources are proposed to what has been presented in the proposed Final Plan to be considered for adoption on December 10, 2021, including the road user charge. For response to comments related to speculative funding, refer to response to comment SOFAR 35-8 in the Final EIR. SOFAR/CNFF concerns are noted and will be considered by the SANDAG Board. |
| 53-10      | Thank you for SOFAR/CNFF’s participation in the environmental review process. SOFAR/CNFF concerns are noted and will be considered by the SANDAG Board. For the reasons stated in these responses to comments, the EIR meets CEQA requirements notwithstanding allegations made in this comment letter. |
For response to comments related to alleged misrepresentation of general purpose lanes, refer to response to comment SOFAR 53-4, as well as responses to comments 53-14, 53-15, and 53-16.

As indicated in response to comment SOFAR 35-12 in the Final EIR, the proposed Plan’s land use pattern focuses growth and development in the mobility hub areas. This was modeled in conjunction with proposed Plan’s transportation network improvements to arrive at the reductions in VMT per capita. The Regional Plan does not “continue a failed policy of highway expansion.” As such, the commenter’s assertion that the transportation network improvements undermine the reduction of VMT per capita is unfounded.

Refer to response to comment SOFAR 53-19 for discussion regarding this asserted 10 percent increase in VMT and GHG.

Regarding the assertion that “…there are no road segments where there is a reduction in general purpose lane”, SANDAG would like to clarify that by 2050, 404 total lane miles would be converted from general purpose lanes to Managed Lanes. The proposed Plan also includes 301 miles of new Managed Lanes construction. By comparison, the proposed Plan would add a maximum of 13 miles new general purpose lane mileage and 52 new lane miles of auxiliary lanes.

Regarding the three segments listed in the comment with alleged increases in general purpose lanes, these projects are not included in the proposed Plan.

The reason that there are more general purpose lanes in the CHT alternative is because none of the managed lanes projects that include general purpose lane conversions are included in the CHT alternative.

Refer to response to comment SOFAR 53-14 for further discussion regarding the conversion of general purpose lanes to managed lanes versus the minimal construction of general purpose lanes and auxiliary lanes in comparison. As such, the 2,122 number is correct and is not wrong as asserted by the commenter.

Regarding the projects listed by the commenter, none of the projects apart from the SR-52 project from Mast Boulevard to SR 125 is included in the proposed Plan (all projects were instead a part of the 2015 Regional Plan). Even then, the general purpose lanes added would subsequently be converted to managed lanes as a part of Project ID CC031 listed in Appendix B of the EIR.

The previously stated the 2,352 number was cited in error, and should have been 2,415, which is consistent with the 2016 numbers presented in Section 4.16 of the EIR.

Please refer to response to comment SOFAR 53-4 regarding discussion regarding the asserted discrepancy in general purpose lanes.
The comment does not raise any concerns regarding EIR adequacy. However, further discussion regarding the proposed Plan’s VMT reductions is provided under Impact TRA-2 in Section 4.16 of the EIR.

Refer to response to comment SOFAR 53-6 for a response to the comment related to the proposed Plan’s transportation network improvement investments.

The University of California Davis’ documentation of the Induced Travel Calculator clearly states the following on their website:
- “The calculator is limited to use for capacity expansions (lane additions, roadway lengthening, and new facility construction). It cannot be used to estimate VMT effects of capacity reductions or lane type conversions…..”
- “The calculator is conservatively limited to use for additions of general-purpose, high-occupancy vehicle (HOV), and high-occupancy toll (HOT) lanes. It should not be used for additions of pure toll lanes (where all users, even HOVs, must pay a toll). Hundreds of both general-purpose and HOV lane mile additions were included in the two principal studies used to derive the elasticities for the calculator (Duranton and Turner, 2011; Cervero and Hansen, 2002; Legislative Analyst’s Office, 2000). While few HOT lanes had been added to publicly owned roadways before the end of the data collection periods for those two studies, studies using data from more recent periods (after more HOT lanes had been opened) have estimated similar induced travel elasticities (e.g. Hymel, 2019; Graham et al., 2014; Melo et al., 2012). Furthermore, because HOT lanes allow more vehicles than HOV lanes (high-occupancy vehicles plus drivers willing to pay to use the lane), they would logically have at least as large induced travel effects as HOV lanes……”
- “Knowledge of local conditions can help contextualize the calculator’s estimates.”

It seems that the commenter ascribed total Managed Lane mileage (not newly constructed) to the calculator and also applied the 821 lane miles entirely in FHWA Class 1 facility type, which would be an incorrect use of the calculator. It appears that the commenter incorrectly ascribed Managed Lane mileage as general purpose lanes, inputted an incorrect amount of additional managed lane mileage, incorrectly assigned all to FHWA Class 1 facility types, and used an incorrect base year (2019 instead of 2016). All of these factors contribute to the higher VMT estimate asserted by the commenter.

For additional context, there are not 821 miles of newly constructed managed lanes under the proposed Plan by 2050. Of that mileage, only 301 lane miles are new lanes. The rest include 116 of existing high occupancy vehicle/managed lane mileage and 404 miles of converted general purpose lanes.

Finally, the SANDAG induced demand off-model methodology adds additional VMT to the model run which is already accounting for portions of both short and long run induced demand. The methodology accounts for all additionally constructed lane mileage on the region’s highway network, including all general purpose lanes, auxiliary lanes, managed lanes, toll lanes, and toll lanes converted to general purpose lanes. The methodology uses 2016 as the base year and correctly inventories additional constructed lane mileage by facility type and FHWA class type. The SANDAG methodology also utilized
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<td>“bespoke ABM testing” to calculate the elasticity of pricing, land use, parking, and other fee-based policies in the proposed Plan, all of which was included in induced demand estimation. As such, SANDAG’s VMT calculations and its inclusion of induced travel demand are reasonable and supported by substantial evidence; there is no substantial evidence supporting commenters assertion that the magnitude of the VMT induced by managed lanes would be “greater than 10% of forecast regional VMT.”</td>
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December 9, 2021

Via E-mail (RegionalPlanEIR@sandag.org)
Kirsten Uchitel
Associate Planner, SANDAG
401 B Street, Suite 800
San Diego CA, 92101

Dear Ms. Uchitel,

On behalf of the San Diego Chapter of the Sierra Club (“Sierra Club”), we provide the following comments on the Final 2021 SANDAG Regional Plan (“Regional Plan”) and Final Environmental Impact Report (“FEIR”). Sierra Club has provided its own individual comments on the Regional Plan.

We thank SANDAG for its responses to the comments and questions we submitted on the Draft Regional Plan and Draft Environmental Impact Report (“DEIR”) and appreciate that SANDAG made some corresponding revisions in the FEIR. However, the Final Regional Plan still depends heavily on roadway expansion and skirts its responsibility to sufficiently reduce transportation-related greenhouse gases (GHGs) and vehicle miles travelled (VMT) to meet the state’s climate action goals. This is a missed opportunity—much more can and must be accomplished with this Regional Plan. As the regional decisionmaker, SANDAG is best equipped, and responsible, for ensuring that San Diego does not impede state climate goals.

Lastly, the Final Regional Plan fails to cure many of the Draft Regional Plan’s violations of the California Environmental Quality Act (“CEQA”), as detailed below. If SANDAG proceeds with adoption of the Regional Plan, it must select the environmentally superior Alternative 3, adopt all feasible mitigation measures to ensure consistency with state GHG reduction goals, and strengthen the FEIR’s existing mitigation measures.

I. The Regional Plan Must Sufficiently Reduce GHG Emissions

As we noted in our previous letter regarding the DEIR, dated October 11, 2021, the FEIR admits significant and unavoidable impacts to GHG emissions due to its inhibition of statewide GHG reduction goals (Impact GHG-5.) SANDAG can and must fully mitigate the Regional Plan’s significant GHG impacts. Further, the FEIR’s current GHG measures must be strengthened to comply with CEQA.
A. The FEIR Must Include All Feasible Mitigation Measures

Impact GHG-5 will be significant and unavoidable because the Regional Plan’s GHG emissions in the San Diego region will exceed SB 32 targets. (FEIR, p. 4.8-33.) SANDAG avoids its responsibility as the regional planning agency to fully mitigate this impact and claims that achieving the necessary reductions to meet state goals will require a coordinated effort across state, regional, and local agencies that is “well beyond the scope and jurisdiction of SANDAG alone.” (P1-369.)

Yet, Senate Bill 375 clearly identified the state’s reliance on regional transportation planners in its goal to reduce transportation-related emissions. (See Stats. 2008, ch. 728 § 1, subd. (a); subd. (c) [“Greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.”].)

In its response to our comments, SANDAG noted the DEIR provides a detailed discussion of the actions required to achieve statewide GHG reductions (FEIR pp. P1-369, see 4.8-54 [describing necessary measures]), yet does not demonstrate why SANDAG cannot incorporate these actions further into the Regional Plan or as mitigation measures (for example, electrification of the transportation sector, investment into healthy soils, decarbonization of new construction, carbon dioxide removal strategies).

Further, the FEIR states, “Additional Plan-level measures to reduce GHG emissions are included as components of the project alternatives in Chapter 6, rather than as individual mitigation measures in this section. These include still more compact land use patterns and policies to reduce transit fares, increase parking prices, and establish road user fees.” (FEIR, p. 4.8-37.) These should have been included as feasible mitigation measures, and must be included if Alternative 3 is not selected.

Additionally, as a Project-level mitigation measure, SANDAG should require all transportation projects that tier from this FEIR to achieve net zero emissions, conduct a GHG analysis that mitigates for the true lifetime of the project, require local off-site GHG mitigation (where necessary), and identify minimum feasible measures to mitigate GHGs based on the category of the project.

Finally, SANDAG should consider the placement of a road use charge on non-electric commercial freight trucks to fund a program that mitigates the GHG and air quality impacts from increased goods movement, especially in the local communities
bearing these environmental harms. In an appendix, the Regional Plan notes these environmental justice impacts: “The negative impacts of goods movement have historically been disproportionately borne by socioeconomically disadvantaged and marginalized communities.” (Plan, Appendix Y-4.) This measure could also increase funding for the existing GHG mitigation measures. A commercial road-use charge would incentivize private companies to reduce their transportation GHGs and invest in electric vehicles. This measure is necessary as commercial shipping giants, including Amazon and Walmart, are rapidly expanding their footprint—and associated GHG emissions—in the San Diego region in contravention of the region’s and state’s climate goals.1

The Regional Plan notes that while measures to increase the efficiency of freight operations “may succeed in improving economic productivity, they may also have adverse effects like increased noise, congestion, or pollution if innovative strategies are not used to mitigate these impacts.” (Plan, Y-4.) The Plan includes several projects to increase goods movement and must mitigate accordingly.

B. The FEIR’s GHG Mitigation Measures Violate CEQA

1. The FEIR Improperly Defers Mitigation Measures Without Adequate Performance Criteria

In responding to our comments on the DEIR, SANDAG points to the Regional Plan’s status as a program-level EIR to condone its impermissibly deferred mitigation, use of overly generalized mitigation criteria, and reliance on future studies. (FEIR, P1-355.)

First, that the FEIR is a program-level EIR does not excuse SANDAG from mitigating the Project’s known impacts to fullest extent possible. Further, an EIR must address the environmental impacts consistently with the underlying activity being approved. The Regional Plan sets forth the specific locations for its planned roadway expansion projects and increase in roadway miles and plans to fund those projects at the expense of further VMT-reducing projects. SANDAG is aware of the extent that it fails to meet state GHG reduction goals—the mitigation measures should require quantified, substantial GHG reductions to mitigate the Regional Plan’s GHG impacts.

SANDAG claims measures GHG-5a through GHG-5d include “specific performance standards,” yet only points to generalized goals that fail to demonstrate how

the measures will accomplish GHG reductions. (See Golden Door Properties, LLC v. County of San Diego (2020) 50 Cal.App.5th 467, 520; King & Gardiner Farms, LLC, v. County of Kern (2020) 45 Cal.App.5th 814, 856.) These measures must include specific performance criteria to ensure actual, significant GHG reductions and prevent inhibition of the state’s climate goals.

Ultimately, the FEIR’s mitigation measures GHG-5a through GHG-5d consist of the formation of grant programs that delay implementation for two to four years and lack objective, enforceable performance standards. The measures omit any commitment by SANDAG to ensure specified GHG reductions. SANDAG should include specific, enforceable targets of GHG reductions through these measures. Each mitigation measure is discussed in turn.

i. Measure GHG-5a: Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans

In its response to our comments, SANDAG asserts that GHG-5a includes performance criteria via its requirement to achieve “additional annual GHG emissions reductions . . . by implementing projects ahead of schedule.” (FEIR, pp. P1-355-356.) First, Sierra Club questions whether this standard really constitutes “additional” GHG reductions. (Golden Door, supra, 50 Cal.App.5th at 514.) Further, merely including a definition, such as “additional,” without objective criteria is insufficient. (Id. at 523.) Finally, GHG-5a fails to require or include objective standards to ensure the Program accomplishes GHG reductions that are real, verifiable, permanent, and quantifiable.

Merely requiring funding applicants to demonstrate, “to SANDAG’s satisfaction, that their project would not be financially feasible . . . in the absence of SANDAG funding” is insufficient. (FEIR, p. P1-356.) GHG-5a lacks objective criteria to demonstrate how this will be determined, impermissibly relying on the vague determination of SANDAG’s “satisfaction.” (Golden Door, supra, 50 Cal.App.5th at 521-22)

SANDAG’s second claimed performance criteria only require applicants to (1) show the project is included in an adopted CAP/GHG reduction plan that quantifies strategies to meet a reduction target and (2) estimate GHG emission reductions from projects “subject to review and approval by SANDAG” (FEIR, p. P1-356.) These claimed criteria do not require SANDAG to ensure the project will ensure substantial, effective reductions. It does not require SANDAG to take any responsibility for quantification of applicant projects or to require a certain level of reductions. SANDAG
claims GHG-5a includes a commitment to structure the grant program using “evaluation criteria,” yet does not provide any information on this. (FEIR, p. P1-356.)

We appreciate that SANDAG revised GHG-5a in response to our comments. However, these revisions still do not cure the measure’s deficiencies. Even though implementation now must begin no later than December 2023, this still delays implementation for two years. Projects that receive funding will then take even longer to implement. We urge SANDAG to accelerate implementation. Further, the measure still fails to demonstrate how it will ensure real, additional reductions, and fails to commit SANDAG to an enforceable reduction target. (FEIR, p. P1-357)

Finally, the Program’s allotted $40 million is a trivial percentage of overall funding, especially compared to the Regional Plan’s overall planned investment. GHG-5a’s paltry funding is highlighted when compared to SANDAG’s projections that selective highway widening will cost $40.2 million per mile. (Regional Plan, p. U-3.) The miniscule funding diminishes the ability of GHG-5a to mitigate the Regional Plan’s GHG impacts.

ii. Measure GHG-5b: Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure

CBCM appreciates SANDAG’S revisions to clarify the timing and add details of GHG-5b’s implementation. (FEIR, p. P1-360.) SANDAG should further strengthen the measure by incorporating factors and requirements for where incentives will be directed. For example, no information is provided on how SANDAG will prioritize who receives funding for one of the program’s 200 electric bikes. (FEIR, p. 4.8-48.) SANDAG should add a requirement to focus on equity in distribution of these incentives in the mitigation measure itself.

Contrary to SANDAG’s claims, the funding itself is not performance criteria when it relates to ensuring GHG mitigation. (FEIR, p. P1-357) This measure should be strengthened by indicating criteria for receipt of the grants and requiring quantification of achieved GHG reductions.

Finally, as noted above, SANDAG should evaluate the placement of a road use charge on non-electric commercial vehicles. While GHG-5b notes that beginning 2022, “SANDAG will begin two planning strategies to inform transition to zero-emission goods movement,” SANDAG should strengthen this measure to require the evaluation of a charge and the establishment of a program to mitigate the GHG and air quality impacts of planned increased goods movement on affected communities.
iii. **Measure GHG-5c: Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere.**

We thank SANDAG for clarifying the timing to begin the Nature-Based Climate Solutions Program, however allowing an adoption deadline of the next Regional Plan (2025) still greatly delays mitigation. (FEIR, p. P1-362.) Further, generally requiring an “increase” in the rate of carbon sequestration over baseline conditions does not constitute specific performance criteria. The measure should include sequestration targets and protocols. *(Golden Door, supra, 50 Cal.App.5th at 520.)*

iv. **Measure GHG-5d: Develop and Implement Regional Digital Equity Strategy and Action Plan**

Despite SANDAG’s assertions that GHG-5d includes “performance criteria,” the FEIR fails to include any objective measures of success, enforceable targets or commitments. (FEIR, p. P1-367.) In contrast, a commitment to achieve a percentage increase in access to broadband service, or including a target level of GHG reductions, would provide specific performance criteria. SANDAG only vaguely requires itself to quantify, “where possible,” GHG reductions from an action plan and provide annual reports. (FEIR, p. P1-364.) These “criteria” do not provide objective, specific measures to ensure successful implementation of the mitigation measure and GHG reductions.

2. **The FEIR Must Ensure Implementation of Project-Level Mitigation Measures GHG-5e and GHG-5f**

Project-Level Mitigation Measure GHG-5e states that “transportation project sponsors *can and should* implement measures to reduce GHG emissions.” (DEIR, p. 4.8-48, emphasis added.) We applaud SANDAG’s response that it will require implementation of Project-level mitigation measures for projects it directly approves, including grants of TransNet funds. (FEIR, p. P1-10.) Yet from SANDAG’s master response, “Ensuring Enforcement,” SANDAG does not explain why it cannot apply Project-level conditions when acting as a “pass-through agency.” (FEIR, p. P1-10.)

While SANDAG may not be the lead agency for the second-tier projects implementing the proposed Regional Plan, each of those projects must analyze consistency with the Regional Plan. At the very minimum, the FEIR should clarify in its discussion of mitigation measures—in the body of the FEIR—that a failure to incorporate the FEIR’s Project-level mitigation measure precludes reliance on the FEIR for tiering. We reiterate our assertion that all projects relying on the Regional Plan FEIR must incorporate its mitigation measures *(CEQA Guidelines § 15168, subd. (c)(3).)* In its response, SANDAG asserts that Projects only need to require “feasible” mitigation
measures, therefore “this Draft EIR cannot definitively say whether the mitigation measures . . . will or will not be incorporated into any specific project that tiers from this analysis.” (FEIR, p. P1-368.) Yet, the Regional Plan details the locations and projects, including anticipated roadway expansions, under the Regional Plan, which allow it to determine specific feasible measures that must be included in projects. (Appendix B.)

Even if the FEIR cannot identify every feasible Project-level mitigation measure, SANDAG must require implementation of mitigation measures that are feasible and applicable to all projects under the Regional Plan. This includes the requirement that all Project GHG emissions be mitigated locally in San Diego County.

3. **Calculations of GHG Emissions from Projects Contemplated by the Regional Plan Must Include the Actual Lifespan of the Projects**

CEQA Guidelines section 15064.4, subd. (a) requires an agency to make a “good-faith effort, based to the extent possible on scientific and factual data,” to calculate the full GHG emissions expected from a project. In our letter on the DEIR, we had noted the impropriety of choosing an arbitrary lifetimes, such as a 30-year project lifetime. (FEIR, p. P1-369, comment 34-9.) In its response, SANDAG notes that the FEIR analyzes Plan impacts at the “same level of detail as the proposed Plan and does not analyze project-specific impacts of individual projects.” (P1-370 to 371.) The FEIR should require projects tiering off of this FEIR to adequately analyze and fully mitigate their GHG impacts based on the actual lifespan of the project.

4. **The Regional Plan Must Disclose the Extent That It Impacts State GHG Goals**

An EIR’s designation of a particular adverse environmental effect as “significant” does not excuse its failure to reasonably describe the nature and magnitude of the adverse effect. (See *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1371.)

In its analysis of the Regional Plan’s GHG impacts, SANDAG combines the projected population growth and land use change, anticipated state measures to reduce GHGs, and its proposed transportation plan. (FEIR, p. 4.8-35 [“reductions from the entire on-road transportation sector account for the land use and transportation components of the proposed Plan as well as the federal and State regulations improving vehicle efficiency and increasing use of zero-emission vehicles.”]) The FEIR does not clearly show what GHG reductions the Plan itself accomplishes versus the extent its claimed reductions actually rely on state measures. This conflated analysis fails to disclose how the Regional Plan’s reliance on roadway expansion impedes state goals. In responding to
comments, SANDAG states that the projected VMT increases are associated with anticipated population and employment growth and not directly associated with increased roadway miles, (FEIR, p. P1-378), yet simultaneously admits that the Regional Plan’s increase in roadway miles has the potential to induce travel (FEIR, p. P1-374.) The analysis is further conflated by the fact that general plan land use assumptions are used to develop the regional growth forecast. (FEIR, p. 4.11-17.) Yet, subsequently enacted plans and projects will need to analyze their consistency with this RTP. The FEIR should better disclose, in the main body of the FEIR, the Regional Plan’s projected reductions from state actions versus SANDAG’s actions in a manner that the average reader understands.

5. The FEIR Must Fully Analyze Inconsistency with Climate Action Plans

Threshold GHG-4 finds that the Regional Plan is consistent with Climate Actions Plans (CAPs) under SANDAG’s jurisdiction. (FEIR, p. 4.8-31) The FEIR notes that a “major objective of the proposed Plan is to reduce GHG emissions . . . Therefore, many transportation network improvements and programs that would be implemented under the proposed Plan would complement these existing and future local efforts to reduce GHG emissions from the on-road transportation sector.” (FEIR, p. 4.8-31) Yet, SANDAG fails to meaningfully analyze and disclose the Regional Plan’s divergence from many of the local CAP’s higher reduction targets to meet the state’s more GHG reduction goals or inconsistencies in GHG projections.2 San Diego’s member cities and counties are looking to SANDAG for leadership.

II. Significant Transportation Impacts Require Further Mitigation

A. SANDAG Must Reduce its Reliance on Roadway Expansion to Meet State and Federal Transportation Goals

As we noted in our comment letter on the DEIR, the Regional Plan fails to meaningfully reduce trip length, instead relying on roadway expansion in contravention of state and federal goals. In its response, SANDAG acknowledged the EIR mischaracterized the Regional Plan’s planned 11.5 percent roadway increase as “slight,” and noted it removed this phrasing in the FEIR. (P1-374.)

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2 As another example, FEIR notes: “Although the Regional Plan’s total regional GHG emissions percentage reductions from all sources would be lower than the [City of Carlsbad’s] CAP percentage reductions, there is no conflict because the City’s CAP makes different assumptions about federal, state, and, in particular, local GHG reduction measures that would be implemented to achieve the City’s target.” (Appendix J-1, emphasis added.) SANDAG should have analyzed the Regional Plan’s consistency with CAP targets and assumptions to ensure a unified regional approach in modeling and targets. Otherwise, local, regional, and state agencies will continue to point fingers about who is responsible for ensuring reductions.
SANDAG claims a successful decrease in roadway mode share, yet simultaneously admits that implementation of the Regional Plan and increased roadway miles could result in the “potential for induced travel.” (FEIR, p. P1-373.) Recent research has detailed how EIRs fail to accurately analyze induced VMT from highway expansion projects. (Exhibit A.) This research presented the National Center for Sustainable Transportation’s Induced Travel Calculator. SANDAG notes that it only “borrowed elements” from the National Center for Sustainable Transportation (NCST) in calculating Induced Demand. (Plan, D3-1 to 2.) What affect did this have on the inducement factor? CNFF has submitted expert comments on the sufficiency of the FEIR’s VMT inducement analysis.

In response to our earlier comments, SANDAG relies on the fact that much of the increased lane miles will be for managed lanes. As we mentioned in our comment on the DEIR, these lanes will be open to use by fee-payer vehicles. (FEIR, p. P1-367.) SANDAG refused to provide information on existing Rapid Bus service, despite existing managed lanes that could be studied for reference. (P1-376.) This information should have been included in analyzing the efficacy of the Regional Plan’s planned reliance on expansion of roadways and managed lanes that still allow paying single passenger vehicles to access.

While SANDAG correctly notes in its response that the interpolated interim VMT per capita targets were not used to determine impact significance (P1-384), these targets are still improperly used to assert that the Regional Plan VMT per capita reductions “remain on target.” (DEIR, p. 4-16-47 to 49) These assertions still serve to downplay the impacts of the Regional Plan on state and federal VMT reduction goals, through induced travel from its reliance on roadway expansions at the expense of investing in more effective public transit opportunities.

Finally, the FEIR admits significant impacts in TRA-2, yet fails to adequately and fully mitigate the VMT increases. On its face, the Regional Plan itself asserts: “Our region simply cannot meet these mandates without reducing the number of miles that people drive on our roadways.” (Plan, p. 44.) Therefore, we reiterate our request from our previous comment that SANDAG strengthen its mitigation measure TRA-2 to clarify that projects tiering off of the FEIR that do not project-level VMT are inconsistent with the RTP. (FEIR, p. P1-383.)
III. The FEIR Must Fully Mitigate Impacts to Biological Resources

We note and thank SANDAG for its commitment to fund regional habitat conservation fund. We request that SANDAG prioritizes securing this funding as soon as possible. (Appendix B-8, p. 9.)

We reiterate our request from our previous comments that SANDAG strengthen its mitigation measures (FEIR, p. P1-387). At the minimum, SANDAG must clarify in the FEIR that projects that fail to incorporate the FEIR’s mitigation measures are inconsistent with the Regional Plan.

IV. SANGAG Should Select the Environmentally Superior Alternative 3

While we had previously requested that SANDAG include an alternative that substantially reduces the Plan’s VMT impacts and biological impacts (FEIR, p. P1-387), in the alternative we express support for Alternative 3: All Growth in Mobility Hubs and More Progressive Value Pricing and User Fee Policies. The FEIR designated Alternative 3 as the environmentally superior alternative. (FEIR, p. 6-9.) While it still does not achieve the necessary VMT reductions, Alternative 3 would achieve the greatest reductions of VMT, GHG emissions, and air quality emissions. (Iid.) Therefore, SANDAG must adopt Alternative 3, or at the least adopt its focus on all growth in mobility hubs.

V. Conclusion

Based on the foregoing comments, we respectfully request that SANDAG revise the Regional Plan to achieve the necessary GHG and VMT reductions, improve protections for biological resources, and resolve the issues addressed in this letter.

Thank you for your consideration.

Sincerely,

Kathryn Pettit
Josh Chatten-Brown
Attorneys for Sierra Club San Diego
Exhibit A
Title
Environmental Reviews Fail to Accurately Analyze Induced Vehicle Travel from Highway Expansion Projects

Permalink
https://escholarship.org/uc/item/14b0x0nm

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Environmental Reviews Fail to Accurately Analyze Induced Vehicle Travel from Highway Expansion Projects

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January 2021

Issue

Induced travel is a well-documented effect in which expanding highway capacity increases the average travel speed on the highway, which in turn reduces the perceived “cost” of driving and thereby induces more driving. This increase in vehicle miles traveled (VMT) increases congestion (often back to pre-expansion levels) and air pollutant emissions, reducing or eliminating the purported benefits of the expansion (Figure 1). Yet highway expansion projects continue to be proposed across California, often using congestion relief—and sometimes greenhouse gas reductions—as a justification for adding lanes. These rosy projections about the benefits of highway expansion projects indicate that the induced travel effect is often not fully accounted for in travel demand models or in the projects’ environmental review process.

With this problem in mind, researchers at the University of California, Davis developed an online tool to help agencies estimate the VMT induced annually by adding lanes to major roadways in California’s urbanized counties. The Induced Travel Calculator estimates project-induced VMT using the project length (in lane miles) entered by the user, lane-mile and VMT data from Caltrans, and estimates of elasticities (the percentage change in VMT that results from a 1% increase in lane miles) from peer-reviewed studies.

The researchers also applied the calculator to estimate the vehicle travel induced by five highway expansion projects in California that had gone through environmental review within the past 12 years. They then compared their estimates with the induced travel analysis completed for the projects’ actual environmental impact assessments. The five projects include (1) the U.S. Highway 101 High-Occupancy Vehicle (HOV) Widening (Marin-Sonoma Narrows), (2) the State Route 1 Corridor Analysis of HOV Lanes (Santa Cruz), (3) the State Route 210 Mixed-Flow Lane Addition (San Bernardino), (4) the State Route 99 South Stockton Six-Lane Project, and (5) the Interstate 405 HOV Widening.

Key Findings

Environmental reviews of highway expansion projects include inconsistent, if any, analysis of induced vehicle travel. The environmental analysis documents for the five projects varied wildly in their discussion of induced vehicle travel impacts. Two documents did not discuss the induced travel phenomenon at all. And the only two documents to analyze it in detail did so in responses to comments, not in the original analysis. Even when the documents did analyze induced travel in detail, the discussion of the effect was contradictory within the documents and inconsistent with the induced travel literature.

Projects’ environmental review documents underestimate induced vehicle travel. Only three of the five documents reported estimates of induced VMT. All three estimates were lower than what the researchers estimated using the

Figure 1. Induced vehicle travel effect of highway capacity expansions
Induced Travel Calculator. In two of the three cases, the estimates were an order of magnitude lower (Figure 2).

**Policy Implications**

The results provide additional evidence that environmental analyses often fail to consistently and accurately discuss—let alone estimate—the induced travel effects of highway capacity expansion projects. Going forward, the Induced Travel Calculator can help agencies consistently quantify induced travel by using elasticity-based estimates of VMT levels derived from the project's lane-mile changes. Indeed, Caltrans' 2020 Transportation Analysis Framework recommends that the Induced Travel Calculator be used where possible to estimate or at least benchmark induced VMT for California state highway system projects.

*More Information*

This policy brief is drawn from “Induced Vehicle Travel in the Environmental Review Process,” a paper in the *Transportation Research Record: Journal of the Transportation Research Board* by Jamey M.B. Volker, Amy E. Lee, and Susan Handy of the University of California, Davis. The article is available at [https://ncst.ucdavis.edu/research-product/induced-vehicle-travel-environmental-review-process](https://ncst.ucdavis.edu/research-product/induced-vehicle-travel-environmental-review-process).

NCST’s Induced Travel Calculator can be accessed at [https://ncst.ucdavis.edu/research-product/induced-travel-calculator](https://ncst.ucdavis.edu/research-product/induced-travel-calculator).

For more information about the findings presented in this brief, please contact Jamey Volker at jvolker@ucdavis.edu.

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**Figure 2. Comparison of induced VMT estimates in highway expansion project environmental analyses versus the Induced Travel Calculator (analyses for the State Route 99 and Interstate 405 projects did not estimate induced travel)**

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1 Handy, S. (2015). Increasing Highway Capacity Unlikely to Relieve Traffic Congestion. UC Davis: National Center for Sustainable Transportation. [https://escholarship.org/uc/item/58x8436d](https://escholarship.org/uc/item/58x8436d)

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The National Center for Sustainable Transportation is a consortium of leading universities committed to advancing an environmentally sustainable transportation system through cutting-edge research, direct policy engagement, and education of our future leaders. Consortium members: University of California, Davis; University of California, Riverside; University of Southern California; California State University, Long Beach; Georgia Institute of Technology; and the University of Vermont.
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<tr>
<td>54-1</td>
<td>SANDAG appreciates the comments received and the concerns noted in this letter will be considered by the SANDAG Board. Please see the following responses for the specific comments provided in this letter.</td>
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<td>54-2</td>
<td>The issues raised in this comment is similar to the issue raised in Chatten-Brown comment letter received on the Draft EIR. Please see response to comment Chatten-Brown 34-1 of the Final EIR. In addition, please see the following for responses to specific comments raised regarding the GHG mitigation measures in the EIR.</td>
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| 54-3       | The Final EIR correctly states that reducing regional GHG emissions to below the regional 2030, 2045, and 2050 reference points based on SB 32 (40% below 1990 levels by 2030), EO 5-3-05 (80% below 1990 levels by 2050), and EO B-55-18 (carbon neutrality as soon as possible and no later than 2045), is well beyond the scope and jurisdiction of SANDAG alone, and will rather required a coordinated effort by State, regional, and local agencies. The Final EIR presents several examples of the types of actions that local, State, and federal governments, the private sector, and individuals will need to take to achieve statewide GHG reduction goals that are outside the jurisdiction of SANDAG. (Final EIR page 4.8-54).

Moreover, the Final EIR provides a detailed discussion of SANDAG’s role in planning for GHG emissions reductions, which includes achieving SB 375 targets for passenger vehicle GHG emissions and other plans and programs that SANDAG proactively prepares and implements to reduce GHG emissions (Final EIR pp. 4.8-41 to 4.8-45). In Impact GHG-2 the Final EIR shows that implementation of the proposed Plan would meet and exceed the region’s SB 375 targets Final EIR (pp. 4.8-27 to 4.8-29).

The Final EIR does address the additional actions referenced in this comment, namely electrification of the transportation sector, investment into healthy soils, decarbonization of new construction, and carbon dioxide removal strategies. Strategies in the proposed Plan to increase use of electric vehicles and remove carbon dioxide from the atmosphere and store it in soils and vegetation through land management strategies that increase the rate of carbon sequestration are described on Final EIR pp. 4.8-42 to -45. The Final EIR also identifies mitigation measures that would result in further electrification of the transportation sector (Mitigation Measure GHG-5b) and removal of carbon dioxide from the atmosphere using nature-based climate solutions (Mitigation Measure GHG-5c). Final EIR Mitigation Measures GHG-5e and 5-f state that transportation projects developed by SANDAG shall, and that land use development projects and transportation projects for which cities, the County government, or other project sponsors are the lead agency can and should, require transportation electrification measures, carbon sequestration measures, and zero-net energy buildings and infrastructure. The comment does not specify any specific examples of electrification of the transportation sector, investment into healthy soils, decarbonization of new construction, or carbon dioxide removal strategies that should be incorporated into the Regional Plan or included as mitigation measures in the Final EIR. |
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<td>This comment also asserts that more compact land use patterns and policies to reduce transit fares, increase parking prices, and establish road user fees as described and included in Alternative 3, should have been included as mitigation measures in the proposed Plan. As the comment notes, these Plan-level measures were included as components of project alternatives in Final EIR Chapter 6, and evaluated for their ability to reduce the proposed Plan’s significant GHG emissions impact. In addition, Mitigation Measures GHG-5e and GHG-5f includes measures to achieve more compact land use patterns, decreased transit fares, increased parking prices, and require fees for driving. The commenter’s suggestion to require all transportation projects that tier from the Final EIR to achieve net zero emissions is not feasible. SANDAG does not have the authority require that all transportation projects meet such a standard because many transportation projects are implemented by other agencies, such as Caltrans, MTS, and NCTD. Additionally, the comment does not address how such a &quot;net zero&quot; standard would be defined, or what types of GHG emissions from transportation projects would be included as part of the commenter’s request for “GHG analysis that mitigates for the true lifetime of the project.” In addition, at this program level of analysis it is not possible to know whether there will be adequate availability of local off-site mitigation opportunities to help such projects meet a net-zero standard, or if available, if it would be feasible for all transportation projects to pay for such off-site mitigation opportunities. Regarding the consideration of placement of a road user charge on non-electric commercial freight trucks, SANDAG will launch a study in the next year to further study the potential of usage-based fees and their capabilities in addressing various goals, including equity and GHG emissions reduction. SANDAG staff will work with Board Members, stakeholders, and community members to develop implementation strategies for a road usage charge, including high level constructs of the program, such as who will pay, the fee structure, and the distribution of revenues. SANDAG is committed to developing a carefully constructed program that will ensure that no particular group, such as those driving fuel-powered vehicles, are paying more than their fair share. Finally, regarding projects that increase goods movement, “Second-tier projects” that would be implemented as a part of the proposed Plan will be subject to separate project-specific CEQA reviews and mitigation as applicable.</td>
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The response also explains why it is not possible at this time for SANDAG to establish additional performance criteria for this mitigation measure in the form of a specific numeric amount of GHG emissions reductions that would be achieved by implementation of the grant program(s).

Mitigation measure GHG-5a meets the requirements of CEQA Guidelines Section 15126.4(a)(1)(B) (refer to discussion in response to comment Chatten-Brown 34-2 in the Final EIR).

54-6 Refer to response to comment Chatten-Brown 34-2 in the Final EIR. Measure GHG-5a sets criteria for when a project would not be financially feasible, specifically: due to insufficient funding or timing of funding availability, in the absence of SANDAG funding from measure GHG-5a. This mitigation measure tasks SANDAG with determining whether applicants’ demonstrations of projects not being financially feasible meet this standard.

54-7 Refer to response to comment Chatten-Brown 34-2 in the Final EIR. Measure GHG-5a requires that applicants for funding estimate GHG emissions reductions from their projects, and structure the grant program using evaluation criteria, evaluation criteria weighting, or similar means that prioritize the allocation of funds to projects that include measurable programs for achieving the GHG emissions reduction targets identified in that jurisdiction’s adopted CAP or GHG reduction plan. The measure would result in real GHG emission reductions. This is demonstrated by the measure’s references to types of potential actions that are known to feasibly achieve substantial GHG emissions reductions and will be eligible for funding through implementation of the measure. The measure does set a performance standard for evaluation criteria by requiring them to be developed and weighted to prioritize the allocation of funds to projects that include measurable programs for achieving the GHG emissions reduction targets identified in that jurisdiction’s adopted CAP or GHG reduction plan.

54-8 As stated in Measure GHG-5a, the grant program(s) will be implemented no later than December 2023. SANDAG will continue to pursue avenues of implementation sooner as suggested by the commenter.

54-9 This comment does not relate to the adequacy of the EIR. As stated in Measure GHG-5a, along with the $40 million dollars cited by the commenter as a part of CAP grants, SANDAG shall also pursue federal and State partnerships to leverage additional dollars for these programs. SANDAG shall document and report to the SANDAG Board of Directors the activities funded by this grant program and the estimated GHG emissions reductions on an annual basis. As such, allocated funding is not limited to the $40 million and SANDAG will continue to consider other reasonable and available avenues of additional funding.

54-10 Comment to incorporate equity criterion into measure GHG-5b is noted. However, no evidence in comment provided to demonstrate that such a criterion would increase the amount of GHG emissions reduced by this measure.

Refer to response to comment Chatten-Brown 34-2 in the Final EIR describing the performance standard set forth in measure GHG-5b. The mitigation measure requires that new funding awarded through these programs shall be above and beyond that for which reductions in GHG emissions have already been considered as part of the off-model calculations to achieve the SB
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<td>375</td>
<td>375 target. In addition, the measure specifies the number of electric bikes, zero-emission buses, and zero-emission light-duty vehicles and/or chargers that will result from implementation of this measure. These types of vehicles and technologies are known to feasibly achieve substantial GHG emissions reductions.</td>
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<td>54-11</td>
<td>Please refer to discussion of the road user charge in the response to comment Chatten-Brown 54-3 above.</td>
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<td>54-12</td>
<td>As stated in measure GHG-5c, development of the Nature-Based Climate Solutions Program will begin immediately upon adoption of the proposed Plan and will be implemented prior to December 2025. Refer to response to comment Chatten-Brown 34-2 in the Final EIR addressing the performance standards that measure GHG-5c will be required to achieve and why it is not possible at this time for SANDAG to specify a specific numeric amount of CO₂ that would be removed from the atmosphere as a result of this measure.</td>
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<td>54-13</td>
<td>Refer to response to comment Chatten-Brown 34-2 in the Final EIR addressing (1) the performance standards that GHG-5d will be required to achieve and (2) why it is not possible at this time for SANDAG to establish additional performance criteria in the form of a specific numeric amount of GHG emissions reductions.</td>
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<td>54-14</td>
<td>The comment related implementation of mitigation measures is similar to the previous Chatten-Brown comments received on the Draft EIR. Please refer to response to comments Chatten-Brown 34-6 and Master Response 2 of the Final EIR, which explain why the EIR’s approach to mitigation measures to be implemented in second-tier projects is consistent with CEQA requirements.</td>
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<td>54-15</td>
<td>As explained in Draft EIR Chapter 4, <em>Environmental Impact Analysis Approach</em> (Draft EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and does not analyze the project-specific impacts of individual projects. Project-specific and site-specific details of subsequent transportation and land use projects will vary widely, including their respective lifetimes. Please see response to comment 34-6 and Master Response 2 of the Final EIR, which explains why the EIR’s approach to mitigation measures to be implemented in second-tier projects and future tiering is consistent with CEQA requirements.</td>
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<td>54-16</td>
<td>The comment alleges that the EIR fails to differentiate the GHG reductions attributable to the proposed Plan from those attributable to State action. Such a comparison is found in Chapter 6, specifically, the analysis of the &quot;No Project&quot; Alternative. This comment also alleges that EIR’s analysis is &quot;confused,&quot; or confused, by the fact that current, enacted general plan land use assumptions are used to develop the regional growth forecast, but that future general plans will analyze compliance with this RTP. The EIR cannot analyze or take into account future, unadopted general plans, and its reliance on existing general plans for regional growth forecasts is entirely appropriate and straightforward. Additional concerns about VMT and induced demand have been addressed in responses to comments Chatten-Brown 54-18 through 54-20 below.</td>
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<td>54-17</td>
<td>As discussed in more detail under GHG-4 in Section 4.8, the proposed Plan is generally evaluated against the goals, measures, and implementing actions of local CAPs and GHG reduction plans to determine any conflicts in this analysis. A detailed CAP consistency analysis by jurisdiction is provided in Appendix J. Table J-1 presents the policies, measures, and implementation actions of each local climate action plan or other local plan adopted for the purpose of reducing greenhouse gas (GHG) emissions. It then analyzes whether the proposed Plan would conflict with or implementation of each plan’s policies, measures, or implementation actions, including specifics regarding how the proposed Plan’s reduction targets relate to each CAP’s. The analysis concluded implementation of regional growth and land use change and transportation network improvements and programs under the proposed Plan would not conflict with or impede the implementation of adopted CAPs, GHG reduction plans, and/or sustainability plans. No other analysis is necessary at this time.</td>
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| 54-18      | The comment states that the proposed Plan fails to meaningfully reduce trip length and instead relies on roadway expansion.

As identified in Tables 4.16-6, 4.16-10, and 4.16-14 of the Final EIR, implementation of the proposed Plan will reduce the average length of vehicular trips within the region under each Horizon Year. Therefore, it is unclear how the proposed Plan will not meaningfully reduce trip lengths. Additionally, as shown in Tables 4.16-13 and 4.16-15, the proposed Plan will expand the miles of transit service by 168,595 miles and bicycle facilities by 519.6 lanes miles. Therefore, the comment is not accurate in stating that the proposed Plan relies on roadway expansion.

Finally, as the comment notes, the word slightly was removed from the text on Page 4.16-43 of the Final EIR. The use of this adjective was not necessary, and the term is not quantitatively defined within the Final EIR. Thus, the adjective was removed to provide clearer statement of the findings. |
<p>| 54-19      | As the comment states, the Final EIR found that the implementation of the proposed Plan will decrease the auto mode share within the region from 87.3 percent under Base Year 2016 conditions to 77.1% under Year 2050 conditions (See Table 4.16-14 of the Final EIR). Additionally, the total VMT generated within the region is projected to increase from 83,614,704 miles under Base Year 2016 conditions to 88,133,934 miles under Horizon Year 2050 conditions (See table 4.16-19 of the Final EIR). The decrease in auto mode share and associated increase in the total VMT generated within the region is mostly, and logically, attributable to the projected increase in population and employment within the region between base year 2016 and Horizon Year 2050 conditions of 433,884 residents and 440,899 jobs (Table 4.16-19 of the Final EIR), not any inducement for residents to drive more miles per capita. This is confirmed in Table 4.16-19 of the Final EIR, where the VMT per capita, VMT per employee, and VMT per service population within the region are all shown to decrease by 16.4 percent, 24.3 percent, and 10.5 percent, respectively. This shows that the total VMT within the regional will increase at a slower rate than the population and employment within the region. Thus, the implementation of the transportation network improvements included within the proposed Plan will help to slow the growth of VMT within the region, not induce it. This is further supported by the comparison of proposed Plan to No Project conditions provided in response to comment 34-13, which |</p>
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<td>shows that the implementation of the proposed Plan will result in a decrease in total VMT of 11,937,229 miles as well as a decrease in VMT per Capita of 2.87 miles, when compared to Year 2050 no-build conditions. The comment also recommends the use of the National Center for sustainable transportation (NCST) Induced Travel Calculator to estimate the induced travel that may be associated with the implementation of the additional roadway lane miles that are included within the proposed Plan. The calculator was not utilized to estimate the potential induced travel under Impact TRA-2 in the EIR for the following reasons:</td>
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<td>• The calculator can only estimate the induced travel under existing conditions; therefore it is not able to estimate induced travel under the 2025, 2035, and 2050 Horizon Years that were analyzed in the proposed plan. • The proposed Plan was analyzed at a programmatic level; therefore, the impacts associated with specific components of the plan were not analyzed individually. As such, since the calculator cannot take into account or analyze all of the transportation network improvements included within the proposed Plan (including bicycle, transit, and TDM programs) its results would not accurately reflect the proposed Plan as whole. • Finally, the ABM2+ is a more accurate tool to calculate transportation related metrics that are associated with the proposed Plan as it has been specifically calibrated to the San Diego region and accounts for geographic, socioeconomic, and demographic factors within the region in which the calculator does not. Additionally, the ABM2+ can account for both the land use and transportation network changes included within the proposed Plan, where the calculator cannot. As such the calculator would not accurately reflect the effects of the proposed Plan.</td>
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<td>Finally, the comment notes that the existing Rapid Bus service performance was not included within the previous responses. This comment was addressed previously in response to comments 34-12 at P1-376–377 of the Final EIR.</td>
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<td>54-20</td>
<td>This comment was previously responded to in response to comments Chatten-Brown 34-14 on page P1-383 of the Final EIR. The comment further insinuates that the use of the interim VMT per capita reduction targets downplay the VMT per capita related impacts identified under TRA-2.</td>
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<td>As noted in the previous response, it is clearly stated in the last sentence of the first paragraph on page 4.16-49 of the Final EIR “The interim VMT per capita targets were not used to determine impact significance.” This is further reflected in the TRA-2 conclusion sections, for each horizon year, where the State’s target of 14.3 percent is used as the significance threshold for each horizon year and not the identified interim VMT per capita target. Thus, the impacts identified under TRA could not be downplayed by the interim targets as they were not cited or used in the conclusions section for any Horizon Year, in the Mitigation Section, or the Significance after Mitigation Section.</td>
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<td>54-21</td>
<td>The comment related implementation of mitigation measures is similar to the previous Chatten-Brown comments received on the Draft EIR. Please refer to response to comments Chatten-Brown 34-6 and Master Response 2 of the Final EIR, which explain why the EIR’s approach to mitigation measures to be implemented in second-tier projects is consistent with CEQA requirements.</td>
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| 54-22      | Funding for the regional habitat conservation fund is identified in Appendix B of the proposed Plan as a near-term action and funding will be sought as soon as reasonably possible.  

The comment related implementation of mitigation measures is similar to the previous Chatten Brown comments received on the Draft EIR. Please refer to response to comments Chatten Brown 34-6 and 34-19 and Master Response 2 of the Final EIR, which explain why the EIR’s approach to mitigation measures to be implemented in second-tier projects is consistent with CEQA requirements. |
| 54-23      | Chatten-Brown, Carstens & Minteer LLP’s support for Alternative 3 on behalf of Sierra Club has been acknowledged and has been included for consideration by the SANDAG Board. |
| 54-24      | SANDAG has provided responses to the comments received and is not of the view that additional revisions to the EIR are necessary at this time. |