JOINT MEETING BETWEEN THE REGIONAL PLANNING COMMITTEE AND THE TECHNICAL AND STAKEHOLDERS WORKING GROUPS

Friday, June 25, 2004
12:30 – 2:30 p.m.
SANDAG
401 B Street, Seventh Floor Board Room *
San Diego, CA

AGENDA HIGHLIGHTS

• PRELIMINARY FINAL ENVIRONMENTAL IMPACT REPORT
• RESPONSES TO COMMENTS ON REVISED REGIONAL COMPREHENSIVE PLAN (RCP)
• REVIEW OF REMAINING RCP CHAPTERS
• RECOMMENDATIONS BY WORKING GROUPS ON THE RCP

* PLEASE NOTE CHANGE OF MEETING ROOM

MISSION STATEMENT

The Regional Planning Committee provides oversight for the preparation and implementation of the Regional Comprehensive Plan that is based on the local general plans and regional plans and addresses interregional issues with surrounding counties and Mexico. The components of the plan include: transportation, housing, environment (shoreline, air quality, water quality, habitat), economy, borders, regional infrastructure needs and financing, and land use and design components of the regional growth management strategy.
Welcome to SANDAG! Members of the public may speak to the Regional Planning Committee on any item at the time the Committee is considering the item. Please complete a Speaker's Slip which is located in the rear of the room and then present the slip to Committee staff. Also, members of the public are invited to address the Committee on any issue under the agenda item entitled Public Comments/Communications/Members' Comments. Speakers are limited to three minutes. The Regional Planning Committee may take action on any item appearing on the agenda.

This agenda and related staff reports can be accessed at www.sandag.org/rcp under Regional Planning Committee on SANDAG’s Web site. Public comments regarding the agenda can be forwarded to SANDAG via the e-mail comment form also available on the Web site. E-mail comments should be received no later than Noon, two days prior to the Regional Planning Committee meeting.

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JOINT MEETING BETWEEN THE
REGIONAL PLANNING COMMITTEE, AND
THE STAKEHOLDERS AND TECHNICAL WORKING GROUPS
Friday, June 25, 2004

ITEM #       RECOMMENDATION

1. WELCOME AND INTRODUCTIONS (Mayor Lori Holt Pfeiler, Chair, Regional Planning Committee; Patty Davis, Chair, Stakeholders Working Group; and Niall Fritz, Vice-Chair, Technical Working Group) INFORMATION

Welcome to this Joint Meeting among the Regional Planning Committee, the Regional Planning Technical Working Group, and the Regional Planning Stakeholders Working Group. The Chairs will provide opening remarks and self-introductions will be conducted.

+2. APPROVAL OF MINUTES FROM MAY 24, 2004 JOINT MEETING AMONG THE REGIONAL PLANNING COMMITTEE, THE TECHNICAL WORKING GROUP, AND THE STAKEHOLDERS WORKING GROUP (pp. 5-15) APPROVE

+3. APPROVAL OF MINUTES FROM APRIL 22, 2004 JOINT MEETING BETWEEN THE TECHNICAL WORKING GROUP AND THE STAKEHOLDERS WORKING GROUP (pp. 16-19) APPROVE

4. PUBLIC COMMENTS/COMMUNICATIONS/MEMBER COMMENTS

Members of the public will have the opportunity to address the Regional Planning Committee and its Working Groups on any issue within their jurisdiction. Speakers are limited to three minutes each. This item also is an opportunity for Regional Planning Committee and Working Group members to make comments or announcements.

REPORTS

+5. PRELIMINARY FINAL ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE REGIONAL COMPREHENSIVE PLAN (RCP) (Rob Rundle) (pp. 20-22) INFORMATION

A presentation on the content of the preliminary final EIR will be made. The preliminary final EIR includes all comments submitted on the draft EIR and responses to comments. The preliminary final EIR is available on the SANDAG Web site at www.sandag.org/RCP.

+6. REGIONAL COMPREHENSIVE PLAN: STAFF RESPONSES TO COMMENTS RESULTING FROM MAY 24, 2004 JOINT MEETING (Carolina Gregor) (pp. 23-43) INFORMATION

On May 24, 2004, a joint meeting was held among the Regional Planning Committee, the Regional Planning Technical Working Group, and the Regional Planning Stakeholders Working Group to discuss the RCP. This report responds to issues raised at the meeting and to comments submitted subsequently via e-mail.
7. REVIEW / DISCUSSION OF REMAINING RCP CHAPTERS (Mayor Lori Holt Pfeiler, Chair, Regional Planning Committee; Patty Davis, Chair, Stakeholders Working Group; and Niall Fritz, Vice-Chair, Technical Working Group)

At the earlier joint meeting, the Regional Planning Committee and Working Groups did not have sufficient time to discuss all RCP chapters. This item provides an opportunity for discussion of the remaining RCP chapters (Borders, Social Equity, Integrated Regional Infrastructure Strategy (IRIS), Performance Monitoring, and Implementation). RPC and Working Group members are encouraged to bring their latest copy of the Revised Working Draft RCP, dated May 24, 2004 for the discussion.

8. ADJOURNMENT BY REGIONAL PLANNING COMMITTEE MEMBERS

Members of the Regional Planning Committee will adjourn from the meeting in order to allow the Working Groups to discuss and form recommendations to the Regional Planning Committee on the Revised Working Draft RCP, as outlined in the next agenda item.

9. RECOMMENDATIONS TO THE REGIONAL PLANNING COMMITTEE BY THE REGIONAL PLANNING TECHNICAL AND STAKEHOLDERS WORKING GROUPS ON THE REVISED WORKING DRAFT RCP (Councilmember Patty Davis, Chair, Stakeholders Working Group; Niall Fritz, Vice-Chair, Technical Working Group)

Each Working Group is asked to make a recommendation to the Regional Planning Committee on the Revised Working Draft RCP. Recommendations will be forwarded to the Regional Planning Committee for its July 2, 2004 meeting. The Chairs of each Working Group will report the recommendations taken by their groups to the Regional Planning Committee on July 2.

10. UPCOMING MEETINGS

Regional Planning Committee: The next Regional Planning Committee meeting is scheduled for Friday, July 2, 2004 from 12 noon to 2 p.m. at SANDAG.

Technical Working Group: The next Technical Working Group meeting is scheduled for Thursday, July 8, 2004 from 1:15 to 3:15 p.m.

11. ADJOURNMENT BY TECHNICAL AND STAKEHOLDERS WORKING GROUP MEMBERS

+ next to an agenda item indicates an attachment
The Joint Regional Planning Committee, Technical Working Group and Stakeholders Working Group meeting was called to order at 9:13 a.m. by Committee Chair Lori Holt Pfeiler. Attached are lists of the attending Regional Planning Committee, Technical Working Group and Stakeholders Working Group members.

1. **WELCOME AND INTRODUCTIONS**

   Mayor Holt Pfeiler, Chair of the Regional Planning Committee, thanked all for attending the meeting. She noted that the Regional Planning Committee and the Working Groups have been working on the Regional Comprehensive Plan (RCP) approximately two years; however, this is the first time that all three groups have met jointly. Gail Goldberg, Chair of the Technical Working Group, and Councilmember Patty Davis, Chair of the Stakeholders Working Group, thanked all for attending and for their work over the last two years.

   Self-introductions were conducted.

2. **PUBLIC COMMENTS/COMMUNICATIONS/MEMBER COMMENTS**

   Maggie Valentine, a San Diego resident and former lobbyist for Riverside County, stated that forced and unplanned growth is over-populating San Diego and ruining its quality of life. She added that there has not been sufficient planning for traffic or infrastructure in the San Diego region. She urged the Regional Planning Committee to consider the quality of life in the region and not increase the density in the region.

   Cynthia Conger, a resident of San Diego, stated that nothing is being done to take care of the residents that live and pay taxes in the San Diego region. If infrastructure for the visitors is not provided, it will destroy the economic engine. What will San Diego be without the necessary upgrades? She requested that before the RPC plans to promote growth and commit the cities to make continual changes in the region, they should think about the effect that it will have in the region.

   Cindy Moore, a concerned citizen, noted that each community is unique with its own concerns and needs - one size does not fit all. She stated that changing the primary commercial land uses of shopping centers in the region to primary residential uses will
change the character and quality of life of communities. She also noted that the promise of additional housing does not always result in affordable housing.

Cynthia Skovgard, a City of San Marcos resident, urged that local land use control not be taken away from jurisdictions, especially with regard to increasing densities. She supports the ideas of the Air Quality Control Board regarding air quality and industrial mixed use projects. She urged the RPC to not force density upon the local jurisdictions and instead, allow them to retain their local control.

Tom Mullaney, representing the Friends of San Diego, distributed a handout entitled, "What's Wrong with the RCP." Referencing the handout, he noted that a key factor with what's wrong with the RCP is that it poses a threat to local land use control. He also stated that the RCP is growth-promoting, that is will not prevent sprawl, and that it will add the population equivalent to another Poway or La Mesa, causing significant impacts that will not be mitigated to a significant extent. He urged the RPC to accept the Resolution for Planned Growth and Local Control drafted by his organization which would amend the RCP to retain local government control and avoid growth inducement, and achieve a better balance between employment and housing growth.

Councilmember Madaffer asked Mr. Mullaney where he thought growth should happen in the region, and whether he thought we should put up a "closed" sign in the region. Mr. Mullaney responded that growth should happen where existing general plans allow it, except for the County of San Diego. He added that other cities should operate like Carlsbad, which has a growth management plan.

Councilmember Davis commented that most of the growth in the next ten years will be from growth of children of existing residents. She asked where he proposed that those children live? Mr. Mullaney commented that the RPC should hold a workshop to debate that issue.

Mayor Houlihan stated that she heard conflicting studies indicating that immigration is major part of this issue.

Dutch Van Dierendonk noted the region cannot continue to sprawl. If densities are not increased in certain places and controlled, the region will build into oblivion.

Dr. Richard Carson, Professor and Chair of the Economics Department at the University of California at San Diego, noted that he analyzed the draft Environmental Impact Report (EIR) and was struck by two things: (1) the EIR assumes that no transportation and other infrastructure improvements are undertaken, and (2) it is unrealistic to assume that the region can re-capture the exported 46,000 housing units needed to serve workers from the San Diego region. Currently, people are relocating to Imperial County to buy single-family homes for less that $200,000, not to live in apartments or condominiums. The Committee needs to think about the three factors that affect housing affordability: salaries, cost of housing, and amenities.

Councilmember Peters asked how Dr. Carson knew that there are people moving to Imperial County for bigger homes for less money, and pointed out that sometimes,
neighborhoods can be improved by intensification and addition of amenities. He also mentioned that in some cases, older couples would choose to move out of their single family homes if they had more housing choices – condos, apartments, townhomes, and the like. Dr. Carson responded that anyone can look at any Multiple Listing Service (MLS) and see that there are larger homes for lesser amounts outside of San Diego County – here, homes are unaffordable. Various cities around the world have shown that with zoning, growth can be controlled.

Mayor Houlihan stated that the average median income in San Diego is $60,000 while the average home price in San Marcos is $640,000 and the average home price in Clairemont is $470,000. How do we address affordability under these circumstances? Dr. Carson replied that San Diego is not in this situation alone. Most coastal cities are faced with the same issues. What can be done? There needs to be some type of subsidy for the low-income people and their incomes need to be increased. However, low-income people will always be here. At some point, businesses will have to pay service workers more money and will have to subsidize their rents.

Stuart Hurlbert, representing San Diego State University, indicated that the local jurisdictions have put a lot of work into their individual local general plans. It would be unwise to cram 46,000 additional units and 100,000 more people into the general plans. He expressed support for the resolution proposed by Mr. Mullaney, which indicates that the RPC should support existing plans, not massive plans for additional growth.

Mignon Sherer, a long-time San Diego resident, stated that uncontrolled growth and cancer share the same definition, but that this situation can be controlled. Individuals can control the size of their families, and cities and regions can control the size of their populations. We act as though San Diego is the only place in the world to live. Economic development corporations advertise around the world for people to move here. She encouraged the Committee to think about the ways it attracts people to the region and urged them to consider Mr. Mullaney’s proposal.

Kathleen Blauatt, San Diego Coastal Alliance member, mentioned that local communities should control their own growth and the region should consider its employment trends. We need to educate our children to take local jobs and stay in San Diego. She added that laws and zoning are being modified and developers are being allowed to do things that are not right, and seniors and minorities are being taken advantage of.

3. SUMMARY OF KEY CHANGES TO DRAFT REGIONAL COMPREHENSIVE PLAN (RCP)

The most recent changes made to the Draft Regional Comprehensive Plan (RCP) were reviewed. Overall, no fundamental changes in policy direction are proposed. Key changes fall into two categories: those called for in the draft RCP in order to complete the final RCP, and those resulting from technical clarifications or comments submitted by the public. Changes based on work called for in the draft RCP occurred primarily in the Urban Form, Performance Monitoring, and Implementation chapters. Changes resulting from technical clarifications or from comments by the public ranged from more clearly articulating local land use authority, to providing additional information on housing element law and other
housing items, to adding a section on natural fire ecology. Staff proposed an additional change: the inclusion of two maps in the Urban Form Chapter showing projected employment and population densities in the region in 2030. The Committee and Working Groups were requested consider the flexibility needed to make additional clarifications or refinements to the RCP based on the process of responding to comments received on the draft EIR. If any changes result in fundamental changes in policy direction, a special meeting of the RPC will be called.

4. SUMMARY OF KEY COMMENTS RECEIVED ON DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

A summary of key comments received on the Draft Environmental Impact Report (EIR) for the RCP was provided. Although SANDAG received comments from various agencies on many issues, many of the comments can be characterized into several major categories: smart growth concepts and impacts; mitigation measures; growth inducing plan; and project alternatives. Despite program-level mitigation measures identified throughout the draft EIR, the document concluded that the RCP would result in significant impacts to land use, population / housing / employment, transportation / circulation, energy, biological resources, and cultural resources. Comments and responses will be provided to the Committee and the Working Groups once completed.

Comments:

Carolyn Chase, member of the Stakeholders Working Group (SWG), questioned the ability to make a recommendation on the RCP without seeing staff’s responses to the comments submitted on the draft EIR. Staff responded that the comment period for the draft EIR ended on May 13th, and that responses to the comments are still being formulated. Staff anticipated having the responses to the comments available two weeks prior to the SANDAG Board meeting in June, as part of the final EIR. Staff added that the purpose of this item was to provide an overview of the kinds of comments received on the draft EIR, and that staff had not identified any issues raised in the comment letters that would require fundamental changes to the RCP. However, if fundamental changes in policy direction are recommended as a result of the responses, staff will call for a special meeting to resolve those issues.

Mayor Holt Pfeiler noted that the intent is for the SANDAG Board to certify the Final EIR with the understanding that a special Regional Planning Committee meeting could be scheduled if necessary to address any significant issues that were raised as a result of the comments received.

Carolyn Chase did not feel that the Regional Planning Committee and Working Groups could make a recommendation on the Revised Working Draft RCP without seeing how staff responds to the comments submitted on the draft EIR.
5. REVISED WORKING DRAFT OF THE REGIONAL COMPREHENSIVE PLAN (RCP) AND COMMITTEE/WORKING GROUP READING ASSIGNMENTS

Chair Holt Pfeiler noted that each Committee and Working Group member was assigned to review two to three chapters of the Revised Working Draft RCP, and that this item would focus on reviewing the revised chapters.

Carolyn Chase made a motion to adopt the "Resolution for Planned Growth and Local Control" proposed by Mr. Mullaney and Dr. Carson and delay the adoption of the RCP.

Chair Holt Pfeiler indicated that no motions were being entertained at that time.

Lynne Baker, member of the SWG, stated that the purpose of the RCP is to improve the land use and transportation connections in the region, and that the document is incentive-based and focuses on collaboration.

Councilmember Davis commented that there is enough information in the RCP for the local jurisdictions to know where the RCP is going and also allow the cities to retain local land use control. She mentioned that the State assigns regions how many housing units to plan for, and that the numbers in the EIR were not just arbitrarily selected. As elected officials, there is an obligation to plan for the projected population increase.

Wallace Tucker, member of the SWG, commented that the tenet of the plan is smart growth, but that the smart growth definition should have a stronger link to open space. He also noted that the smart growth incentives should be more strongly linked to rural lands, parks, and other open spaces.

Mayor Houlihan, member of the Regional Planning Committee (RPC), stated that the comments from the public are indicating that there is a concern regarding infrastructure needs, the impacts of growth on infrastructure, and government’s ability to provide the infrastructure necessary to maintain quality of life. She called out water supply as an example, and indicated that there needs to be some academic modeling done that addresses the public’s concerns, with supporting documentation. She added that the Committee needs to know that what is being planned for is realistic.

Dutch Van Dierendonk, member of the SWG, mentioned that the group has been tasked with an awesome responsibility which will result in major impacts to the region. The group has to get past parochialism and take all of the issues into consideration. He added that the group needs to move forward and make some important decisions.

Councilmember Bond, member of the RPC, indicated that clearly this group is faced with a series of complex issues and problems that are inter-connected. He noted that the fastest-growing city in the United States is Las Vegas, and despite the water issues they face, they continue growing. He added that the San Diego County Water Authority (SDOWA) relies heavily on SANDAG’s growth projections to prepare long term regional water projections. Although the region is doing what it can to plan for a variety of issues, it is difficult to implement culture shifts. The issues discussed in the RCP will take time to be resolved and need to be looked at differently in the future than they are today.
Lynne Baker, member of the SWG, requested an explanation of state law regarding local jurisdictions' responsibilities related to their housing elements. Staff responded that the housing element is a required element of each jurisdiction's general plan. Based on information received from the Department of Finance and councils of governments from throughout the state, the California Department of Housing and Community Development assigns each region a certain amount of housing units that must be planned for in local housing elements over a certain period of time. The State has determined that the San Diego region needs to plan for 107,000 – 111,000 units over the next seven years. SANDAG is working with the local jurisdictions to develop a way to distribute those units among the jurisdictions. Rezoning will likely need to happen to accommodate the regional share of units assigned by the state.

Harriett Stockwell, member of the SWG, noted that some sections of the plan are written in third person and some sections are written in second person. There needs to be clarification so the public will know who “we” and “our” refers to in the RCP – is it the SANDAG Board, the staff, the residents, the stakeholders? Staff indicated that over forty workshops and forums were conducted throughout the region to gain public input on the plan. Based on the public involvement process, the "we" and "our" is representative of the input received from the forums. Staff will review the text in the plan and make clarifications where necessary.

Marla Hollander, member of the SWG, applauded the efforts of all of those members involved in creating this document. It is a global document including guiding principles for the people in the region. The dialogue needs to continue, particularly on implementation, so the group can move on.

Councilmember Druker, member of the RPC, noted that the transportation portion of RCP reflects MOBILITY 2030. However, there is a huge disconnect between the EIR and the RCP. The EIR indicates that the region should be trying to re-capture the residents that have moved to Temecula or Imperial Valley. The RCP, on the other hand, does not include the EIR definition. The transportation system for those commuters needs to be addressed. Staff pointed out a technical clarification – the RCP is not calling for the "re-capture" of those housing units; rather it includes policies to advocate that the region address its existing and projected housing needs.

Councilmember Druker commented that he isn’t certain if that is a realistic goal. People are moving based upon economics and lifestyles. It is unrealistic for the RCP to assume that it can stop emigration.

Michael Stepner, member of the SWG, indicated that most people hate both sprawl and density. One thing that is missing from the Urban Form chapter is a discussion on the importance of the design of transportation facilities on communities. He also noted that the formula for measuring mixed use is not accurate and urged the Committee to drop it. Mixed use should be defined on an area-wide basis, not a project basis.
Janet Anderson, member of the SWG, stated that although the preservation and maintenance of natural areas and use of natural landscaping is included in the Healthy Environment Chapter of the RCP, it should also be included in the Urban Form Chapter.

Mayor Houlihan commented that dream and reality are totally different. She noted that she is supportive of green building because over time, it saves energy but often receives resistance because it is more expensive to build. The Committee needs to be prepared to do a cost analysis. Also, the formula on page 95 of the Housing Chapter defining affordable housing as housing where a person pays no more than 30% of their salary on housing is unrealistic. Additionally, the region has not done a good job of providing replacement housing for low income residents. The RCP should be realistic about this.

Bill Figge, member of the RPC, indicated that the key to the RCP is the linkage between transportation and land use. He expressed his support for the document and its outcome.

Public Comment

Barbara Winton, a San Diego resident, mentioned that the plan should address homelessness. She noted that portable latrines, hand washing facilities and trash cans need to be supplied by the cities or governmental agencies when there are not enough social agencies to handle the need.

Dutch Van Dierendonk stated that he is in agreement with the public speaker. It has been made clear that homelessness has to be addressed by this group to attain any degree of regional planning and social justice.

Lynne Baker mentioned that the group might want to address the issue of fire safety and fire quality and suggested that language be added. She agreed to provide specific comments to the Committee.

Mayor Houlihan stated that in regards to the Multiple Species Conservation Plan (MSCP), the pressure is on to educate the residents that those open space areas need to be set aside for the residents as well as the animals and environment.

Carolyn Chase stated that, overall, the weakest part of the Plan is the link between infrastructure and finance. The IRIS chapter of the RCP needs to point out the areas with infrastructure shortfalls and identify the funding. She expressed concern that the group does not have the responses to the comments on the Draft EIR and indicated that she cannot support the document until that time.

Councilmember Madaffer, member of the RPC, noted that the groups may need to take more time to look at some of the issues brought up today. He is glad that the region is talking about the difficult issues and would like to see some more solid solutions to the current infrastructure problems. He suggested that the group take more time to refine the document and have an additional discussion to know where there is agreement and disagreement on the document. He also mentioned that the Economic Prosperity chapter should include actions relating to housing and redevelopment opportunities.
Chair Holt Pfeiler commented that the group can either continue on with the discussions now or can continue its discussions at a future meeting.

Jim Sandoval, member of the TWG, mentioned that what makes this document different than previous planning and growth management efforts is the tie between transportation and land use. He urged the group to look at the RCP as a policy guide, and to move forward on the document.

Councilmember Hall, member of the RPC, stated that there never will be a document that addresses all the region’s needs. He also stated that local control will not be lost and suggested that the group move forward, as recommended.

Dutch Van Dierendonk agreed with Councilmember Madaffer and indicated that this document is no longer about turf -- it is about everyone. This is a regional undertaking which has to be recognized. He added that he would like to look at the document once more before making a recommendation.

Mayor Houlihan commented that the group has done a wonderful job in creating a vision, however, there are still unanswered questions. She wants to make sure that the document she supports is realistic and genuine and recommended continuing the meeting. She made the motion to continue the meeting for more discussion and analysis of issues that have been raised.

Councilmember Madaffer seconded the motion.

**Action:** Upon a motion made by Mayor Houlihan, and second made by Councilmember Madaffer, the Regional Planning Committee and its working groups, voted by consensus, to continue this discussion at a future meeting. One member of the Regional Planning Committee opposed this action, stating that the groups should move forward today with a recommendation on the revised working draft RCP.

Staff indicated that they will check the calendar for another meeting date and forward a new meeting date to the groups.

6. **ADJOURNMENT**

The meeting was adjourned at 12:13 p.m.

BOB LEITER  
Director of Land Use and Transportation

Key Staff Contact: Carolina Gregor, (619) 699-1989; cgr@sandag.org
## CONFIRMED ATTENDANCE
### SANDAG JOINT REGIONAL PLANNING/TWG AND SWG COMMITTEE MEETING
#### Regional Planning Committee Members
May 24, 2004
9:30 a.m. – 12:00 p.m.

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## CONFIRMED ATTENDANCE
### SANDAG JOINT REGIONAL PLANNING/TWG AND SWG COMMITTEE MEETING
#### Technical Working Group Committee Members
#### May 24, 2004
#### 9:30 a.m.- 12:00 p.m.

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<td>City of Carlsbad</td>
<td>Dennis Turner</td>
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<td>Jim Sandoval</td>
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<td>City of Coronado</td>
<td>Ed Kleeman</td>
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<td>Linda Niles</td>
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<td>Jim Griffin</td>
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<td>Barbara Redlitz</td>
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<td>Dave Witt</td>
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<td>Robert Larkins</td>
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<td>Robert Post</td>
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<td>Gail Goldberg</td>
<td>Member</td>
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<td>Gerald Gilbert</td>
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<td>Jim Lyon</td>
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<td>Gary Pryor</td>
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<td>Caltrans</td>
<td>Kimberly Weinstein</td>
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<td>Dana Friehauf</td>
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<td>Air Pollution Control District</td>
<td>Andy Hamilton</td>
<td>Member</td>
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CONFIRMED ATTENDANCE
SANDAG JOINT REGIONAL PLANNING/TWG AND SWG COMMITTEE MEETING
Stakeholders Working Group Committee Members
May 24, 2004
9:30 a.m.- 12:00 p.m.

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<td>Patty Davis, Chair</td>
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<td>Sierra Club</td>
<td>Janet Anderson</td>
<td>Member</td>
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<tr>
<td>Endangered Habitat League</td>
<td>Lynne Baker</td>
<td>Member</td>
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<td>El Cajon EDC</td>
<td>Claire Carpenter</td>
<td>Member</td>
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<td>All Congregations Together</td>
<td>Susan Carter-Roberts</td>
<td>Member</td>
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<td>San Diego Coalition for Transportation Choices</td>
<td>Carolyn Chase</td>
<td>Member</td>
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<td>Environmental Health Coalition</td>
<td>Paula Forbis</td>
<td>Member</td>
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<td>Jackson-Pendo Development</td>
<td>David Gatzke</td>
<td>Member</td>
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<td>Leadership for Active Living</td>
<td>Marla Hollander</td>
<td>Member</td>
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<td>League of Women Voters</td>
<td>Ramona Salisbury</td>
<td>Member</td>
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<td>County of San Diego Farm Bureau</td>
<td>David Stepp</td>
<td>Member</td>
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<td>New School of American Architecture &amp; Design</td>
<td>Michael Stepner</td>
<td>Member</td>
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<td>East County EDC</td>
<td>Harriett Stockwell</td>
<td>Member</td>
<td>Yes</td>
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<td>Fallbrook Land Conservancy</td>
<td>Wallace Tucker</td>
<td>Member</td>
<td>Yes</td>
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<td>Self</td>
<td>Dutch Van Dierendonck</td>
<td>Member</td>
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June 25, 2004

TO: The Regional Planning Technical and Stakeholders Working Groups

FROM: Carolina Gregor and Janet Fairbanks, SANDAG Staff

SUBJECT: Summary of the April 22, 2004 Joint TWG and SWG Meeting

ACTION: APPROVE

Agenda Item #1: Welcome and Introductions

Gail Goldberg, City of San Diego, and the Honorable Patti Davis, City of Chula Vista, chaired the meeting. Self-introductions were conducted.

PUBLIC COMMENTS AND COMMUNICATIONS

There were no public comments or communications.

CONSENT ITEMS

Agenda Item #2: Summary of the April 8, 2004 Joint Stakeholders and Technical Working Group Meeting

On page 6 change “metric” to “matrix”. Minutes were approved as corrected.

Agenda Item #3: Reminder: Third Round of Regional Comprehensive Plan (RCP) Workshops

Agenda Item #4: Ad Hoc Working Group on Transportation and Land Use Coordination

Agenda Item #5: Recommended Performance Measures for the RCP

Action: The Regional Planning Technical and Stakeholders Working Groups approved the consent Agenda, with a request for staff to consider modifying Agenda Item #5 (Performance Measures) to explore a more detailed performance measure for the magnitude of beach closures and lagoon health.

REPORTS

Agenda Item #6: Smart Growth in the Regional Comprehensive Plan

a. Smart Growth Opportunity Area Matrix

The objective of this agenda item is to develop consensus on the proposed smart growth opportunity area categories as defined in the matrix attached to the agenda. Changes to the matrix from the last meeting include: moving the smart growth design principles to the top of the matrix, adding a column
with examples of communities that illustrate the concepts in each smart growth category, clarifying desired building types by land use intensity, increasing the number of employees per net acre within the Urban Center category, adding shuttle service to regional transit centers within the Town Center category, revising the rural village core category to more closely reflect the County of San Diego’s GP 2020 effort, and adding definitions for land use intensity measurements per net acre and land use building types.

Some working group member comments included that the matrix focuses too heavily on opportunity areas, ignoring developed areas that are already “smart.” A suggestion was made that a separate table is needed for smart growth communities that are already developed. Another suggestion was that the smart growth categories be re-named; for example, existing and planned, already developed smart growth areas, and areas that are not encouraging further development. Explore the idea of categorizing each city in the county, but there are negatives to this approach.

Staff clarified that the idea of the matrix is to provide examples of different types of smart growth in the region; it is not intended to definitively identify all smart growth opportunity areas in the region. The next step will be to identify all of the areas with consensus on the smart growth concept map.

Other working group members expressed strong support for the matrix, and for staff’s individual meetings with local planning staffs to work through the issues. Other comments included that we should look at this as a starting point – not the “end all,” and that the matrix and the future concept map will serve not just as an inventory, but rather as a tool for prioritizing investments in the future.

Next, staff discussed the new method for quantifying mixed use within smart growth opportunity areas, which included allocating land area to the specific use types proportional to the floor area allocated to each use. Working group members stated the new quantification method would result in difficulties because there can be more than two uses in a building, making it difficult to compute how much land or floor area is dedicated for each use.

Staff clarified that the issue revolves around intensity targets; and asked whether the residential targets for mixed use areas need to be lower.

Working group members proposed considering 25 du/acre for mixed use areas as a minimum target, instead of calculating separate floor areas for different uses within mixed use zones. Others stated that the key is achieving mixed use; not necessarily quantifying the amounts of mixed use.

Some members commented that people don’t necessarily live near where they work, even if they live in a mixed use project, or a mixed use neighborhood. Also, there should be a distinction between urban and suburban mixed uses where suburban uses can be non-vertical. Developers may not be able to make vertical projects work economically.

Staff clarified that the density thresholds are not for individual projects, rather for larger mixed use areas, and that the calculations would apply only to the lands allowing residential uses on them within the larger areas. Staff asked whether the 25 du/ac recommended previously is reasonable for mixed use within all of the smart growth categories within the matrix.
Working group members commented that other factors that need consideration besides density include parking, set backs, building typologies, and allowable uses in zones to achieve the densities we are looking for.

Dave Witt, City of La Mesa stated that the City of La Mesa completed an extensive study on this issue using the expertise of architects, builders, and property owners. The outcome was an effective set of variables that looked at infill development with interesting conclusions. He agreed that suggested 25 du/acre should be a minimum threshold and that there should be incentives for parking that could increase the densities.

Action: A motion was made, seconded, and passed to include the 25 du/ac as a minimum target and forward the report to the Regional Planning Committee.

b. Guidelines for Strengthening the Local / Regional Plan Connection

Comments from working group members included: the guidelines need to emphasize urban natural parks; preserve natural parks and features in urban areas such as canyons and small parks, to emphasize this point, separate from agricultural protection as a separate bullet. Replace bullets with numbers or letters. The general plan/community plan could include a policy to work with educational institutions to site appropriate facilities as a way to support the objective of offering broad access to education and workforce development opportunities for all residents. Energy efficient transportation, such as bicycle facilities and pedestrian access should be added to the SGAs’s column to support meeting the region’s energy needs in a fiscally and environmentally sound manner. There should be policies and strategies to ensure that new development pays its fair share for all regional public facilities – not just transportation facilities; and include schools as a public facility.

Action: Motion was passed to forward the report to the Regional Planning Committee.

c. Framework for the Smart Growth Incentive Program

A handout entitled “Guiding Principles for Smart Growth Incentives” was distributed at the meeting. Comments from working group members included: would there be assistance from SANDAG in areas where a jurisdiction wants to make non-transportation-related infrastructure improvements to implement smart growth? Staff responded that it is still a policy question as to how much SANDAG can or should fund infrastructure not directly related to transportation. In the second bullet, “Funding for Smart Growth Land Use and Community Development,” a suggestion was made to add a phrase qualifying existing Smart Growth Areas, as well as Smart Growth Opportunity Areas for assistance and local planning grants. Other working group members disagreed, stating that funding is limited, and should therefore be applied to opportunity areas that create additional capacity for meeting regional housing needs. Other members added that the region should find demonstration projects that result in high quality, visible projects, serving as catalysts for other communities to pursue smart growth. Putting the money where it’s going to be most visible is going to give the region more “bang for the buck.” It was recommended that this concept be incorporated into the principles. Other comments included that the first bullet (Priority for Regional Transportation Funding Investments) is well stated, but we need to make sure we implement it. Staff recommended adding language suggesting “high” or “highest” priority to that bullet. Members agreed, and encouraged staff to review the principles for “slippage” language, and remove as much as possible so that the guiding principles would be strong and meaningful.
Action: Motion was passed to make minor modifications, as discussed, and forward the report to the Regional Planning Committee.

Agenda Item #7: Regional Housing Needs Assessment

SANDAG staff updated the working groups on the Regional Housing Needs Assessment (RHNA) and the housing element schedule in relation to the RHNA process. The housing element updates in the San Diego region are due June 30, 2005; the RHNA process will not be completed by the statutory deadline of June 30, 2004. Draft numbers are expected to be available by June or July, with final adoption following a 90 day public review period.

On Thursday, April 15, 2004, staff from the California Department of Housing and Community Development (HCD) attended a meeting to answer questions and discuss issues regarding the Regional Housing Needs Assessment process and other housing element-related issues for the upcoming housing element cycle.

Comments from the Working Group members include: Completion of the housing elements by June 2005 may be possible in spite of getting the numbers finalized after the deadline. It's hard to predict how long the housing element process will take; number crunching and working with housing advocates can delay the process. The housing element deadline is June 2005; would SANDAG request extension from the State Legislature?

SANDAG staff stated that we are leaning toward not requesting an extension as work on the housing element can proceed without the final RHNA numbers, and the draft numbers should be available by July. Some Working Group members agreed with proceeding in this manner.

Other comments included: It would be helpful if SANDAG could provide information on census data and numerical numbers sooner than later; it would be preferable for the housing element updates to include smart growth principles; and would there be a benefit to doing a joint environmental analysis for housing elements?

SANDAG staff clarified that the jurisdictions have to identify sites to address their RHNA numbers in their housing elements, or include a program to identify sites in the housing element. Also, most jurisdictions prepare a negative declaration to meet CEQA requirements when they update their housing elements.

Agenda Item #8: Adjournment and Next Meeting

The next meeting will be a joint meeting with the Regional Planning Committee, the SWG and TWG on Monday, May 24, 2004 from 9:30 a.m. – 12 noon to review a revised working draft of the RCP.
PRELIMINARY FINAL ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE REGIONAL COMPREHENSIVE PLAN (RCP)

Introduction

At the May 24, 2004 joint meeting of the Technical Working Group (TWG), Stakeholders Working Group (SWG), and Regional Planning Committee (RPC), it was recommended that the working groups and RPC receive the comments and responses to the draft Program Environmental Impact Report (EIR) to understand SANDAG’s responses to the issues raised during the public review period. SANDAG has prepared and distributed to the TWG, SWG, and RPC a preliminary version of the Final RCP EIR, which includes all the comments received on the draft EIR and SANDAG’s responses (see Appendix B of the EIR).

SANDAG is referring to this document as a preliminary Final EIR in the event that minor changes are made to the document prior to distribution to the SANDAG Board of Directors for consideration in July. SANDAG staff would identify any such changes that occur to the version being reviewed by the TWG, SWG, and RPC so that the SANDAG Board of Directors will be presented with all changes that have occurred to the document. While it is not anticipated that any significant changes will be made, SANDAG staff is still in the process of verifying that all the requested changes have been incorporated throughout the document.

Discussion

The EIR was prepared in order to provide a program-level analysis of the Regional Comprehensive Plan. It is not possible for the EIR to identify project-level impacts due to the long-term and comprehensive nature of the program. However, as required by the California Environmental Quality Act (CEQA), the EIR does provide a level of detail that is consistent with the detail provided in the RCP itself.

During the public review period for the draft EIR, SANDAG received comments from the following agencies, organizations, and individuals:

State Agencies

Governor’s Office of Planning and Research
California Department of Fish and Game
California Department of Conservation
Governor’s Office of Emergency Services
Transportation Corridors Agencies
Local/Regional Jurisdictions

City of Carlsbad
City of Chula Vista
City of Coronado
City of Del Mar
City of San Diego, Environmental Services Department
City of San Diego, Planning Department
City of Solana Beach
County of San Diego
San Diego County Regional Airport Authority
San Diego County Water Authority
San Diego Local Agency Formation Commission

Organizations

Friends of San Diego
San Diego County Archeological Society, Inc.
Sierra Club
Seltzer, Caplan, McMahon, Vitek

Individuals

Patricia Aguilar
Richard T. Carson
Mary H. Clarke
Thomas Davis
Robert J. Hoffman
Wallace Tucker
Group of concerned citizens

The responses to the many comments submitted to SANDAG resulted in numerous clarifications to the text of the EIR. Text that has been added to the document appears in an underline format. Text that has been deleted appears in the right margin of the EIR. In addition, an abstract has been added to the final EIR that includes an index of changes made in the document between the draft and final versions. Also, where changes to the document were made in response to a comment, the text of the response either directs the reader to the changed text in the document or provides the actual change in the response as well as the document.

The following provides an overview of some of the major issues that were raised in the comments.

Purpose of EIR

The purpose of the EIR is to provide an overview of the types of environmental impacts that could occur in the future if the RCP is adopted and implemented. The RCP will not have direct environmental impacts, as adoption of the plan will not authorize changes to occur; rather the RCP defines a framework to guide future growth as local jurisdictions implement RCP goals, policy objectives, and actions such as identifying Smart Growth Opportunity Areas, implementing habitat conservation plans, and developing a well integrated transportation system. These changes could require future local land use plan amendments that would also be required to conduct environmental analysis.
Project Description

Many comments received on the draft EIR asked whether it was the goal of the RCP to increase housing capacity in the region by 46,000 residential units. The RCP has not been designed to induce growth, but rather to meet the projected population growth through 2030. The RCP does not have a stated goal of increasing population or inducing growth in the region by 46,000 residential units. The EIR identified the addition of 46,000 units as a basis for analysis. This number is similar to the assumptions used in the 2030 Regional Transportation Plan analysis and recognizes that some projected growth would still be located outside the region even if sufficient capacity was identified in local general plans due to such factors as home prices and personal preference. If there was no number selected for analysis, it would be difficult to prepare any sort of meaningful impact analysis of the goals, policy objectives, and actions contained in the plan.

One goal of the RCP and smart growth development is to provide housing and transportation choices for the region’s residents and employees. Exporting households to Riverside or Mexico while household members continue to commute to jobs within the region has impacts in this region. The added congestion, pollution and other impacts of interregional commuting would have a negative effect on quality of life within the region. The RCP is intended to improve overall quality of life, and one possible outcome of its implementation is that some portion of those 93,000 households would not live outside the region. The 93,000 houses represents the number in the population growth forecast for which capacity has not been identified in local general plans.

Mitigation Measures

Several comments on the draft EIR questioned SANDAG’s authority to identify mitigation measures that SANDAG would not be responsible for implementing. CEQA is specific in its requirement that feasible mitigation be outlined for all impacts identified in the analysis. Further, CEQA requires that findings be made if the agency taking action on the project is not the same agency responsible for implementation of the mitigation measure(s). SANDAG anticipates that the mitigation measures identified in the EIR can be used as guidelines for agencies to consider if and when they amend their land use plans to incorporate the RCP goals, policy objectives, and actions.

Due to the generalized nature of the analysis contained in the RCP EIR, it is not anticipated or recommended that agencies utilize the document to “tier off” for environmental analysis of subsequent land use plan amendment as permitted by CEQA. The RCP EIR can be used as a reference document; however it is recommended that agencies prepare their own environmental document when land use plans are updated. As such, local agencies will not be bound to the mitigation measures identified in the plan, but should use them as guidance or identify other measures that would adequately reduce significant environmental impacts to a level less than significant.

The SANDAG Board of Directors will review and consider the information in the Final EIR when considering the adoption of the RCP in July.

BOB LEITER
Director of Land Use and Transportation Planning

Key Staff Contact: Rob Rundle, (619) 699-6949; rru@sandag.org
REGIONAL PLANNING COMMITTEE

June 25, 2004

AGENDA ITEM NO.: 6

Action Requested: INFORMATION

REGIONAL COMPREHENSIVE PLAN: STAFF RESPONSES TO COMMENTS RESULTING FROM MAY 24, 2004 JOINT MEETING

Introduction

On May 24, 2004, a joint meeting of the Regional Planning Committee, the Regional Planning Stakeholders Working Group, and the Regional Planning Technical Working Group was held to review key changes to the Revised Working Draft Regional Comprehensive Plan (RCP) and key comments on the draft Environmental Impact Report (EIR). This report responds to issues raised at the meeting and to comments submitted subsequently via e-mail.

Discussion

Discussion at the joint meeting and subsequent communications via e-mail resulted in both general comments regarding the RCP and the EIR, as well as chapter-specific comments. These comments are summarized in Attachment 1 of this report, and staff responses are provided.

Due to the number of comments raised, this staff report also summarizes and re-emphasizes the key goals of the RCP. As the RCP states, currently no overall framework exists for coordinating local plans with each other, or with related regional plans and programs. The RCP provides a new planning framework for the San Diego region – one that pulls together the various local and regional plans from throughout the region and establishes a coordinated regional planning document that serves as an organizing framework and guidance document for the many existing plans in the region.

The RCP performs a function that individual local plans or single-issue regional plans cannot – it identifies challenges that we face as a region under existing plans, collectively, and identifies opportunities for the region to chart a future course for itself, looking both within the region and beyond our existing boundaries. This first Regional Comprehensive Plan is a starting point for comprehensive planning efforts in the region, and will be monitored and updated on an ongoing basis.

Future Outcomes if Local Plans Left Unchanged

The RCP recognizes that the region faces serious problems if existing local plans are left unchanged into the future. The Regional Planning and Policy Framework Chapter of the RCP points out the following future outcomes if local plans are left unchanged1:

- Reduced open space. Current plans would consume far more land than a smart growth development pattern, which would emphasize more redevelopment and infill in existing

1 Text reflects minor clarifications made based on comments received at the previous joint meeting.
urbanized areas near transit and activity centers such as downtowns and shopping areas, and more mixed use and compact development in currently-vacant areas that are planned for residential uses.

- More expensive housing and fewer types of housing choices. On average, current densities in the cities and urbanized unincorporated areas are relatively low, and planned densities on currently-vacant land are even lower. This pattern limits our ability to address our projected housing needs, pushes up housing costs, and can result in more persons sharing the same house due to high home prices and rents.

- Imbalance between housing and jobs. Jobs are a key driver of population growth. Current local general plans allow for more growth in jobs than housing. Additionally, local plans largely separate residential areas from job centers.

- Environmental degradation. An imbalance between jobs and housing leads to more and longer commutes and increased energy consumption. It also affects development patterns within our watersheds which increases urban runoff, and in turn, affects the quality of both our drinking water and our water bodies, such as lakes, streams, bays, and the ocean.

The public involvement process for the RCP asked residents from throughout the region to envision the region by the year 2030. That process resulted in the following regional vision: "To preserve and enhance the San Diego region’s unique features – its vibrant and culturally-diverse communities, its beaches, deserts, mountains, lagoons, bluffs, and canyons, and its international setting – and promote sustainability, economic prosperity, and an outstanding quality of life for everyone." The involvement process also resulted in a number of core values, ranging from livable, walkable, safe, and healthy neighborhoods, to preserved and maintained open spaces, rural communities, and agricultural areas, to a transportation system that better links jobs, homes, and major activity centers, as reflected in Chapter 2.

Chapters 4A – 5 of the RCP contain detailed analyses of existing conditions in the region, as well as goals, policy objectives, and recommended actions to achieve the shared regional vision and core values. The RCP recognizes that many local governments currently are updating their general plans, and that many others will begin this process during the next few years. It also acknowledges that this represents a great opportunity to incorporate smart growth principles into local planning frameworks, and that many local jurisdictions are already doing that. It supports jurisdictions that are moving forward, and commits to providing incentives to support their efforts. The following bullet points summarize key recommendations contained in the Revised Working Draft RCP ².

Key RCP Recommendations

- Focusing future population and job growth away from rural areas and closer to existing and planned job centers and public facilities to preserve open space and to make more efficient use of existing urban infrastructure;

- Directing transportation facility improvements and other infrastructure resources toward smart growth opportunity areas;

- Increasing mobility and transportation choices;

- Increasing the supply and variety of housing choices, especially higher density multifamily housing, for residents of all ages and income levels;

- Protecting and enhancing our environment;

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² Text reflects modifications being made to the final RCP based on comments received at the previous Joint meeting.
Creating safe, healthy, walkable, and vibrant communities that are designed and built accessible to people of all abilities;

Coordinating with our surrounding areas and tribal governments within the region to proactively address border-related issues;

Recognizing the importance of social equity and environmental justice in the planning process;

Addressing infrastructure needs in a comprehensive manner; and

Focusing on collaboration and incentives as key implementation mechanisms.

Major Uses for the RCP

Additionally, the RCP specifies how it can and should be used, as described in the following diagram which is included in the Introduction Chapter.

MAJOR USES FOR THE RCP

- Identifying a preferred direction for regional growth. Through the RCP, our region collectively determines where future growth should be encouraged and where it should be avoided. The RCP identifies smart growth opportunity areas and provides a policy framework for prioritizing infrastructure investments in those areas.

- Strengthening the connection between land use and transportation decisions. Most land use decisions are made locally, while most transportation decisions are made regionally. The RCP provides a framework to better integrate land use and transportation decisions.

- Connecting local general plans and regional infrastructure plans. The RCP serves as a framework for local jurisdictions as they implement their general plans, and for infrastructure service providers as they prepare and update their facility master plans. SANDAG does not have land use or regulatory authority and does not issue permits. However, through the RCP, the regional leadership has agreed to an incentive-based framework for achieving a regional vision.

- Supporting smart growth with regional transportation dollars. SANDAG is responsible for programming federal, state, and local transportation funds in the San Diego region. SANDAG will provide funding incentives to communities that have or are willing to adopt land use plans that support smart growth. The current regional transportation plan, MOBILITY 2030, takes a first step toward our efforts to grow in a smarter, more sustainable way, but the RCP moves us even further in that direction.

- Achieving more sustainable development for future generations. The RCP embraces the concept of sustainability, which means making land use decisions and infrastructure investments that are good for the environment, the economy, and all people.

- Providing a proactive approach to issues of fairness and equity. Our region is becoming more ethnically diverse and, as the Baby Boom generation ages, collectively older. The RCP evaluates our policies for fairness-- to ensure they do not disproportionately negatively affect minority and low income communities. It also promotes the inclusion of a diverse mix of people in our local and regional planning processes.

Continued...
Cooperating with our neighbors within and outside our region. The RCP highlights issues that should be addressed cooperatively by SANDAG, the region's 19 local jurisdictions and tribal governments, our neighboring counties and cities, and the Republic of Mexico.

Monitoring our progress. SANDAG and member agencies will use performance measures to track progress made toward achieving the RCP goals.

Helping to meet state government goals. Caltrans has been a major underwriter of the RCP, in hopes that better, long-term planning and coordination in the San Diego region will improve the region's transportation system. The RCP can help achieve stated goals such as less traffic congestion, more transportation alternatives for our increasingly diverse population, greater economic prosperity, more effective use of our energy and fuel, increased public involvement in transportation planning, and a healthier environment.

Broad Public Involvement

Finally, as stated in the RCP, and referenced above, thousands of people helped prepare the Regional Comprehensive Plan, from residents who participated at local public workshops to business leaders, environmentalists, housing advocates, educational leaders, civic organizations, farming interests, design professionals, health advocates, planning directors, public works directors, city managers, community based organizations, local and state-elected officials, and representatives from state agencies, federal agencies, neighboring counties, and the Republic of Mexico.

In addition to the monthly meetings (and sometimes even more frequently) held by the Regional Planning Committee, the Technical Working Group, and the Stakeholders Working Group, more than 40 workshops and forums were held in cities around the region to gain input from residents on the vision, core values, goals, policy objectives, and actions of the RCP. Additionally, as part of the public involvement effort, a number of community-based organizations, representing a diverse range of ethnicities, income levels, and age ranges throughout the region, performed outreach in their communities on RCP issues. These community-based organizations helped identify issues of importance in their communities that SANDAG would not have been able to identify on its own. Residents' ideas from the workshops and forums, and ideas from the Regional Planning Committee and the Working Groups, were incorporated throughout the RCP.

Responses to Comments

Attachment 1 summarizes comments received at the last joint meeting and subsequently via e-mail on the Revised Working Draft RCP, and provides staff responses to the comments. As reflected in the attachment, staff has continued to make changes and clarifications to the Revised Working Draft RCP based on comments received in order to reflect the input and feedback provided by the Regional Planning Committee, the Working Groups, and others before the final document is presented to the SANDAG Board for formal action on July 23, 2004.

BOB LEITER
Director of Land Use and Transportation Planning

Key Staff Contact: Carolina Gregor, (619) 699-1989; cgr@sandag.org
Discussion at the joint meeting and subsequent communications via e-mail resulted in a number of general comments and chapter-specific comments from members of the Regional Planning Committee, the Technical Working Group, the Stakeholders Working Group, and the public regarding the RCP and the EIR. These comments are summarized below, and staff responses are provided.

GENERAL COMMENTS

- Local Control – The RCP threatens local control. Residents, local policymakers, and local staffs should decide on local land use issues. Local jurisdictions have worked hard on updating their general plans, and those plans are adequate.

  Staff Response: The RCP respects local land use control. There are no provisions in the RCP that either remove or weaken the land use authority of local jurisdictions, or provide SANDAG with more authority than it currently has. Chapters 1 (Introduction), 4 (Regional Planning and Policy Framework), and 9 (Implementation) of the RCP clearly state that each jurisdiction in the region makes its own decisions regarding land use. As stated in the Introduction, the RCP "recognizes that each jurisdiction in the region makes its own decisions regarding land use, and then builds upon the best elements of our existing local plans and regional infrastructure plans to provide a regional blueprint for where and how we want to grow. It identifies challenges that we face as a region, and provides a vital alternative to where we could end up if we continue with business as usual." Chapter 4 describes future outcomes if local plans are left unchanged, and Chapter 9 encourages a collaborative planning approach that builds up from the local level into a regional framework to establish stronger connections between transportation and land use, to better connect local and regional plans, and to foster cooperative approaches to implementing the actions contained in the plan. The RCP also clearly states that SANDAG does not have land use or regulatory authority, and does not issue permits.

- Growth Promotion; Growth Control – The RCP calls for 46,000 more homes and 100,000 more people above and beyond existing local plans, and is therefore growth-inducing. Cities and regions can control their size. Economic development corporations promote growth in San Diego worldwide.

  Staff Response: The first comment misrepresents the main purpose of the RCP, suggesting that the goal of the RCP is to recapture 46,000 housing units that would be built in southern Riverside County or Baja California if local general plans within the San Diego region are not changed. The comment likely emanates from the project description contained in the draft EIR. The draft EIR did in fact characterize the proposed project as potentially recapturing 46,000 housing units that would have been "exported" out of the region as one method of evaluating potential impacts of implementing a number of policies included in the draft RCP. However, the project description used in the draft EIR quantifies the potential impacts of the plan for analysis purposes and is not the stated goal of the RCP. The RCP evaluates a "base case" scenario (based upon current land use elements of local jurisdictions’ general plans) and asks whether the base
case can be improved upon using local government policy options. Improved upon, here, means improving the region’s quality of life, including better air quality and less traffic congestion, above what is expected to occur in the base case scenario.

One of the local government policy options that would improve the region’s quality of life (compared with the base case) is for jurisdictions in the region to implement “smart growth” land use policies. The RCP suggests that public policies can influence the quality of life. “How” and “where” growth occurs in the context of the RCP is more important than “how many” units are built in the region.

The EIR, not the RCP, is the document that compares the effects of locating 46,000 units inside or outside of the region to the base case scenario. The EIR assumes that because of the complexities of regional planning, coordination between local and regional agencies, and other political and fiscal realities, about 40 to 60 percent (37,000 to 55,000) of the 93,000 units forecast to be interregional commuters between 2000 and 2030 could be located in the San Diego region as a result of implementing the RCP. Where a specific population number is necessary for analysis in the EIR to address the potential environmental effects (beneficial and adverse), the midpoint of this range was used (46,000 units).

With regard to economic development, the goal of the RCP (and many economic development agencies) is to improve the quality of job growth, and therefore, improve the standard of living when compared to a base case scenario. The Evaluation of Growth Slowing Policies for the San Diego Region report (SANDAG, 2001) demonstrated that the region cannot control its size or stop growth without inflicting severe consequences on our local economy and worsening our standard of living. If our objective is to improve our quality of life, artificially restricting growth and economic prosperity is in conflict with that objective.

- **Existing Plans** – The implementation of existing plans is already a huge challenge.

  **Staff Response:** There is no question that handling the growth anticipated under existing plans will be challenging. In fact, Chapter 4 of the RCP identifies serious problems with the implementation of local plans if left unchanged, including reduced open space, more expensive housing and fewer types of housing choices, an imbalance between housing and jobs, and environmental degradation. This is one of the reasons that the RCP was prepared – to better coordinate land use, transportation, infrastructure decisions, and investments at the local and regional levels in order to help the region maintain and improve its quality of life.

- **Land Consumption** – The RCP will not prevent sprawl – it does not permanently preserve rural areas, it does not contain urban growth boundaries, and it does not include a link between densities in urbanized areas and land preservation in rural areas.

  **Staff Response:** Contrary to the comment, implementation of the RCP can reduce additional sprawl. The RCP envisions three mechanisms for directing future growth away from rural areas and into more urbanized areas. The first is relying on and supporting local land use authority. In the case of the County of San Diego, the RCP recognizes that the General Plan 2020 (GP2020) effort is attempting to focus much of the unincorporated area's growth in rural villages within rural village limit lines, significantly reducing development densities in its semi-rural and rural areas. Additionally, the RCP encourages the application of smart growth principles to vacant
residential land, by promoting more compact development patterns where new communities are built. By clustering housing around compact, walkable town centers, new development on vacant land can preserve more open space for habitat and recreation. A section on preserving open space has been added to the Urban Form Chapter for additional clarification on this issue.

The second mechanism is through the habitat conservation planning process. In the San Diego region, most remaining natural habitats are included in subregional habitat conservation plans. Two subregional plans have been approved to date – the MSCP and the MHCP, together targeting almost 200,000 acres of land for conservation, including portions of land in the County of San Diego. Additionally, the County is developing habitat conservation plans for North County, and is expected to take action this December, and then will begin planning the East County MSCP subarea plan. The RCP includes proposed policy objectives and actions.

The third mechanism is the use of transportation funding as an incentive to promote smarter growth. Because the RCP calls for SANDAG to coordinate its transportation investments with local land use decisions, many of the transportation funds that SANDAG allocates can provide incentives for smart growth development. How this strategy is implemented will be determined as SANDAG updates its transportation project prioritization process in the first phase of RCP implementation and subsequent RTP updates. A key recommendation of the RCP is to direct transportation facility improvements and other infrastructure resources toward those areas where compact, higher density, mixed use, pedestrian-oriented development exists now, is currently planned, or has the potential for future incorporation into local land use plans.

The comment that the RCP does not include a link between densities in urbanized areas and land preservation in rural areas is correct. The RCP does not discuss concepts such as transfer of development rights between jurisdictions. In the two-year preparation effort of the RCP, this concept was not raised by any members of the Stakeholders Working Group, the Technical Working Group, or the Regional Planning Committee. However, the RCP does not preclude such programs.

- Exported Units and Housing Affordability – Capturing housing units that are currently exported to Riverside and Imperial Counties and Baja California won't work and isn't needed. We can't lower our housing prices enough in our region to prevent interregional commuting.

**Staff Response:** The RCP is not attempting to provide comparably sized units in San Diego County at Riverside County prices. This is not reasonable given market characteristics and land prices in the two regions. The Housing Chapter of the RCP does recommend increasing the supply and variety of housing choices, especially higher density multifamily housing, for residents of all ages and income levels wishing to reside within the San Diego region. Under current plans and policies, some of these people will be forced to reside outside of the region.

It is also true that some people will choose to live in Riverside County and other locations rather than San Diego County in order to obtain a single family detached unit at a lower cost. It is not a goal of the RCP to prevent interregional commuting. Rather, one objective of the RCP is to provide an adequate supply of housing for the region’s workforce to minimize the projected rate of increase of interregional and long-distance commuting. Additionally, the Housing Chapter includes a number of actions that can result in additional local affordable housing, in addition to the construction of new units. It is anticipated that implementation of the RCP's
smart growth strategies, which would result in modest density increases in key locations, will
serve to meet the RCP’s stated goals of improving the quality of life for people living in the
region. In fact, smart growth strategies currently being implemented throughout the region, in
areas such as downtown San Diego (where dwelling units are being sold even before
construction is completed), La Mesa, El Cajon, and Chula Vista, are providing increased housing
and lifestyle options throughout our region.

- Impacts of RCP - The RCP results in severe impacts and the draft EIR is inadequate. The draft
  EIR assumes that no transportation or other infrastructure improvements are undertaken.

  Staff Response: Contrary to the comment, the EIR does assume that these transportation and
  infrastructure improvements are made. Regarding transportation improvements, SANDAG’s
  adopted Regional Transportation Plan (RTP), MOBILITY 2030, is a $42 billion blueprint for a
  transportation system that includes a variety of strategies designed to improve mobility and
  travel in the San Diego region through the year 2030 and contains smart growth assumptions
  (intensification of land use in key locations similar to what is proposed to be implemented
  through the RCP). The major RTP investments in roadway and transit infrastructure and services
  are projected to improve level of service (LOS) on major travel corridors in the San Diego region.

  The EIR for the RCP was prepared in accordance with the California Environmental Quality Act
  (CEQA) and identified significant and unmitigated impacts in the areas of Land Use,
  Population/Housing/Employment, Transportation/ Circulation, Energy, Biological Resources, and
  Cultural Resources. Table 1.6-1 of the EIR contains a summary of the impacts, significance of
  impacts, and requirements for mitigation. Each mitigation measure was addressed to the level
  of specificity allowed for by the project level analysis in Sections 5.1 through 5.12 of the EIR.

- Traffic and Infrastructure - The RCP fails to address increased traffic and lack of
  infrastructure. How will the region obtain the funding to deal with traffic and environmental
  issues (maintenance, management, monitoring of habitat conservation plans), especially if the
  TransNet Extension does not pass?

  Staff Response: The RCP goes to great lengths to address increased traffic and infrastructure
  provision as described in the Planning and Policy Framework, Transportation, Urban Form, and
  IRIS Chapters. In fact, the RCP suggests that the region needs to do more than what is currently
  included in existing plans and programs in order to meet the challenges of anticipated
  population growth. The RCP links transportation funds to land use decisions as an incentive to
  local jurisdictions for adjusting general plans and policies to address the transportation and
  infrastructure needs of our region.

  If the proposed TransNet extension does not pass in November 2004, there will be future
  transportation funding opportunities. As discussed in the Transportation Chapter, the current
  $42 billion Regional Transportation Plan (RTP), MOBILITY 2030, assumes current sources and
  levels of federal, state, and local transportation revenue to fund proposed improvements. In
  addition to current sources, additional revenue is expected from three primary sources: an
  extension of the TransNet half-cent local sales tax, higher levels of state and federal
  discretionary funds, and increases in state and federal gasoline taxes based on historical trends.
  These three additional revenue sources account for $12 billion of the $42 billion plan. Other
  potential funding sources, such as development impact fees, user fees, and private investments,
could augment traditional revenues available for transportation projects, programs, and services.

The Healthy Environment Chapter includes an action to secure regional funding for habitat conservation plan implementation. SANDAG is committed to securing regional funding either through the extension of TransNet or some other regional source. The TransNet ordinance, recently adopted by the SANDAG Board of Directors, includes a commitment to act on additional regional funding within the timeframe necessary to allow a ballot measure to be considered by the voters no later than four years after passage of the TransNet Extension.

- **Community Character** – Changing land uses (ex. underutilized shopping centers to primarily multi-family housing) can change community character, often in ways that existing communities do not want.

  **Staff Response:** The Urban Form Chapter of the RCP addresses the importance of preserving community character as the region continues to grow. It emphasizes that good urban design and an active public participation process are the keys to land use changes that are successfully integrated into the community.

- **Housing Mix** – People want houses with yards – condominiums and apartments are not the solution for everyone's housing needs.

  **Staff Response:** We agree that there is no single housing type that will meet all housing needs, and in response the RCP promotes the provision of a variety of housing types.

- **Water Supply** – Need to consider water needs; need to conduct modeling on water supply.

  **Staff Response:** SANDAG and the San Diego County Water Authority (SDCWA) have a memorandum of understanding that SDCWA will use SANDAG population forecasts for their future water planning efforts. If the RCP is approved and local jurisdictions make subsequent changes to their local plans increasing housing capacities, then SDCWA will factor the additional population into their forecast as reflected by SANDAG's next forecast, and that information will be used by SDCWA during their next water planning update. Comment Letter S on the draft EIR, from the SDCWA indicated that “the Regional Water Facility Master Plan is flexible enough to allow for the sizing and timing of water facilities to be adjusted to meet the demand, whether it increases or decreases from the Year 2020 forecasts.”

  Mitigation measure ServSys-1 in the EIR states that water, sewer/wastewater, and landfill providers shall periodically update plans to ensure adequate facilities are available to meet projected locations and intensities of growth. Implementation of these mitigation measures will reduce the potentially significant impact to water facilities and supplies to below a level of significance.

  Furthermore, recent legislation has sought to provide greater ties between land use planning, growth, and water supply. State legislation requires the region to assure that sufficient water supplies are available before new development is approved.
Resolution - A "Resolution for Planned Growth and Local Control" should be pursued to amend the RCP to retain local government control and avoid growth inducement, and to achieve a better balance of employment growth and housing growth.

Staff Response: The RCP does not need to be amended for local control to be maintained. As discussed earlier, the RCP clearly respects local government control of land use. Additionally, several chapters of the RCP, including the Regional Planning and Policy Framework, Housing, Economic Prosperity, and Borders Chapters, recognize that current local general plans allow for more growth in jobs than housing and that local plans largely separate residential areas from job centers, resulting in more and longer interregional commutes, increased energy consumption, and other impacts. The RCP includes goals, policy objectives, and actions to address these jobs / housing issues. Implementation of RCP actions could result in the construction of additional housing units above and beyond those included in existing general plans. The draft EIR analyzes the potential impacts of the implementation of the RCP and compares it to the implementation of existing local plans, concluding in its "plan-to-plan" analysis that overall, the region fares better under the Regional Comprehensive Plan.

CHAPTER-SPECIFIC COMMENTS

Chapter 1 - Introduction

First Person / Third Person - Who does "we" and "our" refer to in the RCP - the SANDAG Board, the staff, the residents, the stakeholders?

Staff Response: "We" in the RCP is meant to be representative of the collective people of the San Diego region, inclusive of the citizenry and government representatives. During the course of the preparation of the RCP, many people, groups, elected officials, and local staff members were involved in defining the regional vision and core values, and contributing to the content included in each of the chapters. Staff has reviewed the use of the words "we" and "our" in the chapters, and for purposes of clarity, replaced the terms where specific entities (such as SANDAG, for example) were implied but not used.

Project Description - The RCP does not reflect the project description contained in the draft EIR - people move based on economics and lifestyle - stopping emigration should not be a goal of the RCP.

Staff Response: Stopping emigration is not a goal of the RCP. A goal in the Borders Chapter of the RCP is to achieve a better mix of, and accessibility to, jobs and housing throughout our international and interregional borders and with the tribal governments. Additionally, a goal of the Housing Chapter is to provide a variety of affordable and quality housing choices for people of all income levels and abilities throughout the region. Based on comments generated at the May 24, 2004 Joint Meeting and on comments submitted on the draft EIR, staff has clarified the project description in the Final EIR. The RCP is reflected in the project description of the EIR; however the EIR provided a quantitative measure of increased housing for analysis purposes only.
Chapter 3 – Overview:

- Environmental Conditions – The Overview Chapter should include environmental conditions.

Staff Response: The Overview Chapter is primarily intended to provide a very general portrayal of the current state and future trends of the region’s population and housing characteristics. It does contain some regional land use facts and figures, including the amount of constrained lands and the current status of our regional open space preservation efforts. The Healthy Environment Chapter is a more appropriate place for a detailed, subregional discussion of environmental conditions.

Chapter 4A – Urban Form:

- Design of Transportation Systems – The Urban Form Chapter is missing a discussion on the importance of the design of transportation facilities to communities.

Staff Response: A discussion on the importance of transportation facility design to the walkability of a community has been added to the Key Issues section of the Urban Form Chapter. The addition discusses the importance of balancing the need for auto access with the need for safe, convenient and attractive pedestrian and bicycle access.

- Measuring Mixed Use – The formula in the Urban Form Chapter for measuring mixed use should be dropped. Mixed use should be defined on an area-wide basis, not on a project basis.

Staff Response: The notes to Table 4A.2, Smart Growth Area Classifications, include a description of how land use intensities should be calculated for residential, employment, and mixed use development within the context of the categories identified in the matrix. These are not intended to be definitions of land use types. To clarify this point, the heading for this note has been modified.

- Preservation of Natural Areas – The Urban Form Chapter should include concepts contained in the Healthy Environment Chapter related to the preservation of natural areas.

Staff Response: The Urban Form Chapter includes a policy objective to protect natural systems, high value habitat areas and other open space areas that define the character of our communities. Also, the Urban Form Chapter states that the region’s urban form is defined by its physical features and its distinct communities – canyons, river valleys, and coastal estuaries - as framing our cities and towns to provide natural boundaries. The region’s habitat conservation plans are recognized as influencing development and conservation patterns in the region. In addition, a discussion on the relationship between urban form and the preservation of open space has been added to the Key Issues section of the Chapter.

- Fire Management – The Urban Form Chapter should address fire issues as related to unincorporated rural areas.

Staff Response: The Urban Form Chapter addresses the need to design communities to facilitate protection from fires; the Chapter does not distinguish between urban and rural communities.
The plan also supports reduced exposure to the risks of wild fires in rural areas by encouraging more development within the urbanized areas.

- Natural and Community Open Space – When discussing incentives, the Urban Form Chapter should include the preservation of more natural and community open space as a result of clustering. Additionally, the goal of the Urban Form Chapter should include, "while saving more open space."

Staff Response: The following goal of the Urban Form Chapter has been modified to include the italicized text: "Focus future population and job growth away from rural areas and closer to existing and planned job centers and public facilities to preserve open space and to make more efficient use of existing urban infrastructure." One of the policy objectives in the Urban Form Chapter is the protection of agricultural areas, natural systems, high-value habitat areas, and other open-space areas that define the character of our communities. In addition, one of the actions states that natural resources should be preserved. The Chapter specifically mentions the unique physical features of our communities – canyons, river valleys, and coastal estuaries – as framing our cities and towns to provide natural boundaries. The habitat conservation plans influence future development and conservation patterns in the region; serving as a natural greenbelt winding through the region. Finally, the definition of Smart Growth Opportunity Areas in rural settings includes the County of San Diego’s GP2020 concept of a rural village limit line that would contain all but very low density development in rural areas. These Smart Growth Opportunity Areas will be the focus of SANDAG’s Smart Growth Incentive Program. Finally, the “Principles for Developing Criteria for Smart Growth Incentive Programs” contain language regarding funding for other smart growth activities, including habitat protection and the like.

Chapter 4B – Transportation:

- High Speed Rail – The High Speed Rail (HSR) discussion differs between the Transportation Chapter (page 82) and the discussion in the Borders Chapter (page 214). The information given on page 214 should also be used in the Transportation Chapter. The Coastal Corridor discussed on page 82 will act as a feeder to the HSR system.

Staff Response: The discussion of high speed rail in the Transportation Chapter has been revised to be consistent with the discussion in the Borders Chapter.

- Tribal Governments – Page 84: Sentence two should read “Gaming-related and other types of development has led to rapid economic growth for many tribes…..”

Staff Response: The requested change has been made.

- Movable Barriers – Page 91, Program and Project Development #2: Change movable lanes to movable barriers. Include interconnected and real time travel information to the priority signalization.

Staff Response: The action has been revised to include movable barriers, interconnected traffic management systems, and real-time traveler information.
Regionally Significant Projects - The RCP needs a clearer definition of “regionally-significant projects” per the California Environmental Quality Act (CEQA) and the Congestion Management Program (CMP).

Staff Response: The Transportation Chapter includes a section that discusses the Enhanced CEQA Review process related to the Congestion Management Program and large development projects (projects generating 2,400 or more average daily trips or 200 or more peak period trips). Additionally, the Implementation Chapter calls for the development and implementation of an improved intergovernmental review process where SANDAG and other public agencies assess proposed local development projects that have significant regional impacts within the context of RCP goals and policy objectives. Text has been added to the Implementation Chapter reflecting that the improved intergovernmental review process will seek to better define “regionally significant” projects, which should be reviewed for compatibility with regional plans, including the RCP, RTP, CMP, and habitat conservation plans, and that an expanded intergovernmental review process will provide an opportunity to address issues beyond transportation, providing a more comprehensive planning approach, as advocated by the RCP.

Chapter 4C – Housing:

Cost Analysis - SANDAG should conduct a cost analysis - ex. upfront costs of green building versus long-term savings.

Staff Response: This is beyond the scope of the RCP, but would be a good topic for future housing forums. This topic will be relayed to the Regional Housing Task Force for consideration.

Housing Affordability - The statewide formulas related to housing affordability are unrealistic.

Staff Response: The statewide formulas related to housing affordability consider a household to be “overpaying” for housing if they are paying 30 percent or more of their income toward housing costs. While many households can and do pay more than 30 percent of their income toward housing costs, for lower income households this can represent an extreme burden, and leave them with few resources for other necessary expenses such as food, health care, and transportation.

Replacement Housing - The RCP should be realistic about replacing homes lost though redevelopment.

Staff Response: The action in the Housing Chapter regarding replacement of homes has been changed to reflect the fact that while in some cases the provision of replacement housing for lower income residents is required by state law, the requirement might not be feasible in all circumstances. The action now focuses on developing strategies to provide replacement housing (versus actually providing replacement housing) for lower income residents as conversion, demolition, redevelopment and/or infill development occurs.
- Homelessness – Need to address homelessness in the RCP.

Staff Response: The RCP does address homelessness. Homelessness is discussed in the “meeting our diverse housing needs” section of the Housing Chapter as “one of the biggest housing-related challenges facing the San Diego region today.” Statistics from the Regional Task Force on the Homeless highlight the need for affordable supportive and transitional housing. Additionally, the Housing Chapter includes three actions that address homelessness:

- Identify and rezone appropriate sites for homeless facilities, transitional housing, farmworker housing, and housing for those in need of supportive services, while not disproportionately siting them in any one community.

- Pursue and ensure the lawful and efficient use of existing funds for the creation of additional affordable housing for families, seniors, persons with disabilities, the homeless, and other lower income residents.

- Develop new funding sources for the creation of additional affordable housing for families, seniors, persons with disabilities, the homeless, and other lower income residents, such as housing trust funds, linkage fees, and bonds.

Chapter 4D – Healthy Environment:

- Agricultural Buffers – Agricultural buffers should be added to the list of Action items.

Staff Response: Agricultural buffers, as they relate to native habitats and urban development, are a component of the habitat management plans that have been developed for the habitat conservation plans. The Healthy Environment Chapter of the RCP includes actions to assure coordination and cooperation throughout the region on habitat management and monitoring functions and to secure funding for ongoing land management and biological monitoring of high-value habitat areas.

- Ground Water – Comments on overdrafts of ground water by nurseries should be added.

Staff Response: Overdrafts are directly related to safe yields which are the annual amount of water that can be taken from a source of supply over a period of years without depleting that source beyond its ability to be replenished naturally in "wet years." Water districts responsible for groundwater basins used for potable water are responsible for safe yield. The scope of the RCP did not include a discussion of safe yields. The Implementation Chapter states that additional topics will be considered in future updates to the plan, and this topic could conceivably be considered in future updates.

- Fire Management – The Healthy Environment Chapter should recognize that people are moving into, not just closer to, habitat areas. Propose deleting the sentence regarding roads into habitat for fire access as it does not contribute to prevention, but may increase access to remote areas for firebugs. The RCP is skewed too heavily towards roads and clearing and not enough towards subdivision and land planning design to locate housing where there is adequate egress. Natural fire movement is not aimed (canyon tops are like chimney flues in a fire) at homes. Fencing and planting within 30-100 feet of the home is most critical so as to not
prevent a fire ladder from reaching the home. The RCP should acknowledge that no amount of fire breaks will protect us in a wind and drought driven firestorm.

Staff Response: The Healthy Environment Chapter was changed to state that the fire management strategy must provide sufficient fire suppression equipment and personnel; it does not suggest that roads for fire access be built in habitat areas. The habitat management plans include provisions to achieve biological resource goals and hazard reduction for humans and their property. In the Urban Form Chapter, the public safety section was amended to state that the design of the community also should facilitate protection from fires and design in sufficient fuel management zones (i.e., fire breaks).

Chapter 4E – Economic Prosperity:

- Economic Prosperity – The Economic Prosperity Chapter should include actions relating to housing and redevelopment opportunities.

Staff Response: The Economic Prosperity Chapter does include a discussion of these important issues and includes actions related to housing. The Prosperity Actions are designed to increase the supply of homes in the region, raise incomes, and pursue state-local fiscal reform, which taken together and along with other actions outlined in the Housing Chapter, will help make housing more affordable to our residents. There are numerous actions relating to redevelopment opportunities throughout the RCP; additional emphasis on redevelopment has been added to the actions in the Economic Prosperity Chapter in response to this comment.

Chapter 4F -- Public Facilities:

- Energy – The Energy section does not sufficiently push the envelope for renewables.

Staff Response: The RCP includes the following action: "Develop renewable energy resources including wind, solar, and geothermal, to help meet the region's needs in an environmentally-sensitive manner," and includes other actions relating to energy conservation and efficiency.

The amount of renewable energy from in-County supplies in 2002 was 25.1 megawatts (MW), or less than one percent. In 2002, legislation was enacted to create a Renewable Portfolio Standard (RPS). The RPS requires all investor-owned utilities in California to provide by 2017 20% of their overall electric supply with energy supplied by renewable energy resources, including wind, solar and geothermal.

In the last 3 years, there has been a dramatic increase in the use of solar technologies as a result of increased consumer awareness, consumer response to high electricity prices, and enhanced incentives. Late in 2002, SDG&E procured approximately 237 MW of renewables (including wind, landfill gas and biomass), which increased total regional energy supplies from under 1% to approximately 7%. The targets above are based on the goals established in the renewable portfolio standard. But they go further by achieving the RPS requirements sooner than 2017, and then continuing to increase the use of renewables to achieve double the RPS standard by 2030.
SANDAG recently formed the Energy Working Group (EWG) that reports to the Regional Planning Committee. One of the EWG's responsibilities is to evaluate renewable resource targets identified in the Regional Energy Strategy and update the targets to ensure the region is sufficiently aggressive in moving beyond the state standards.

- Waste Generation Assumptions and Not Enough Support of Source Reduction, Recycling, and Use of Recycled Materials – “The numbers in Table 4F-1 for growth of tons of waste generated are puzzling, when compared to the numbers in Table 2.1 for population growth. The latter calls for a 37% increase in population between 2000 and 2030, whereas generation of waste is projected to grow by 98% between 2000 and 2020! If the amount of trash per person is projected to grow faster than the population, this is a major problem that should be addressed in Chapter 4F with proposed additional recycling measures. On the reasonable assumption that the amount of trash grows at the same rate as the population, the number of tons generated per year would be projected to be about 9 million; if the amount diverted were increased to 60%, the total disposed would be approximately the same as today. The point is, the assumptions about the growth rate in trash generated are unusual, and they are critical to the conclusions, so they should be stated and justified, especially in view of the controversy surrounding the siting or expanding of landfills.” Additionally, the RCP is not written to powerfully support source reduction, recycling, and use of recycled materials, and it supports the Gregory Canyon landfill as necessary to meet the region's disposal needs.

Staff Response: Table 3.1 depicts the forecasted population growth in the San Diego region between 2000 and 2030. Table 4F.1 depicts the estimated waste disposal amounts in the San Diego region between 2000 and 2020. The population projection is derived from SANDAG’s Final 2030 Forecast; the waste estimates are a direct reproduction of estimated future disposal needs at facilities in San Diego County. The disposed tons are measured by the Disposal Reporting System (DRS), which is administered by the California Integrated Waste Management Board (CIWMB). The figures used to project the disposal figures for the region were based on actual tonnages reported by the CIWMB from 1995-2001.

There are several reasons that the rate of population growth is lower than the projected growth rate of solid waste disposal tonnages. Disposal tonnages are affected by fluctuations in imported and exported solid waste tonnages, as well as changes in population and business activity. There is not a 1 to 1 correlation between population and waste tonnage. Furthermore, disposal rates may increase for a number of reasons, such as additional construction and demolition activity, more yard waste, or additional population and its related population-serving activity. Disposal tonnages can be reduced through additional recycling and other diversion activities or by a decline in economic activity.

To address the estimated disposal tonnages, Chapter 4F emphasizes that greater diversion levels result in additional years of landfill capacity - for example, the Chapter explains that a 55% diversion rate results in two additional years of landfill capacity; each 10% increase in the region could yield four to six additional years; and at 75% diversion starting in 2005, there would be no need for additional landfill space during the 15-year capacity requirement of the Countywide Siting Element.

The Chapter recognizes the Countywide Siting Element of the Countywide Integrated Waste Management Plan as the document that must demonstrate 15 years of disposal for solid waste
for all jurisdictions in the region, and acknowledges that the Gregory Canyon landfill is currently contained in the Countywide Siting Element as a possible landfill site. However, the first policy objective in Chapter 4F clearly calls for minimizing the need for additional landfills and providing appropriate infrastructure for resource recovery, management, and disposal facilities; the second policy objective calls for exceeding the state-mandated recycling rate of 50% and working toward a 75% diversion rate. Additionally, four of the six actions call for recycling and waste reduction efforts, ranging from securing an appropriate network of sites for recycling, resource recovery, composting facilities, and transfer stations, to providing incentives and education/training programs for waste reduction and resource recovery.

Chapter 5 – Borders:

- Desert Line - The Borders Chapter should state more clearly the status of the Desert Line of the SD&AE.

  Staff Response: The Desert Line references have been updated to reflect the current status.

- Maps of Tribal Nations - Page 197 Figure 5.2: This figure shows parts of the Santa Ysabel nation within the Mesa Grande nation. This has created some discussion from both tribal governments. Caltrans has researched this issue and has corrected its maps, which are available for use in the RCP.

  Staff Response: An updated map will be included in the final RCP.

- Compacts - Page 200, Tribal Reservations: There are 14 tribes, not 12, within San Diego County that have gaming compacts signed and ratified with the State of California.

  Staff Response: This correction has been made.

- High Speed Rail - Page 214: Good discussion of High Speed Rail. Should use this information in the Transportation Chapter (see comment above)

  Staff Response: The discussion of high speed rail in the Transportation Chapter has been revised to be consistent with the discussion in the Borders Chapter

Chapter 6 – Social Equity and Environmental Justice Assessment

- Cost of Living – Page 251: Because the federal poverty level is so out of tune with what it costs to live here, can we use another statistic which will relate to cost of living? For example, the California Budget Project produces annual cost of living assessments for all counties in California. Their most recent publication is, Making Ends Meet: How Much Does It Cost to Raise a Family in California? Oct. 2003.

  Staff Response: We agree that the federal poverty level is extremely low. Unfortunately, while it is beneficial to have reports that quantify the cost of living in San Diego, we are not able to obtain accurate information on the percentage of households in the region that actually earn the hourly wage or salaries listed in those reports. However, information will be added on the
number of households that are considered extremely low income, very low income, and low income.

- **Urban Form Action – Page 255:** The use of “heavy” industrial at the end of action #1 is too limiting—sources often considered light industrial can also be very polluting. “Heavy” should be stricken from this sentence.

  **Staff Response:** This action was changed to read “Avoid and mitigate incompatible land uses, for example, by establishing buffers or transition zones between housing and industrial uses or major transportation corridors that could pose health risks”.

- **Buffering Housing from Freeways –** The smart growth opportunity areas map in the EIR shows encouragement of additional housing development near the freeways. We should not muddle the message of buffering the freeways with other types of uses. The California Air Resources Board recommends buffers of 500 feet from roads with over 100,000 vehicle trips per day. I recognize we want to encourage housing development near transportation corridors, but can that be with the caveat that it not be located too close to major polluting freeways?

  **Staff Response:** The action listed in the response above now addresses the potential location of housing near major transportation corridors. In addition, language was added to the Key Issues section of the Urban Form Chapter to clarify that major transportation facilities are inappropriate within residential areas without significant mitigation.

**Chapter 7 – Integrated Regional Infrastructure Strategy:**

- **Infrastructure Financing –** The RCP should be honest and upfront about existing infrastructure costs and lack of financing. Additionally, the IRIS should tabulate the regional expenditure deficit created by growth over the next twenty five years. Page 275 of the IRIS should include a discussion of the use of development impact fees.

  **Staff Response:** The Integrated Regional Infrastructure Strategy (IRIS), an element of the RCP, contains extensive analysis of eight of the most important infrastructure areas affecting the region’s quality of life, including Transportation, Water, Wastewater, Storm Water, Solid Waste, Energy, Education, and Parks and Open Space. With regard to funding infrastructure and infrastructure deficits, the IRIS is very clear. “Whether one considers infrastructure needs at the federal, state, or local level, one finding is consistent across all infrastructure providers: the overall request for infrastructure resources is greater than the available pool of resources.” Given the resources available and recognizing that all federal, state, and local public facilities and services work within limited resources, most of these eight infrastructure areas have operating and capital improvement budgets designed to meet the infrastructure needs each is responsible for providing. In other words, spending more than you have is a deficit. Keeping spending within the limited resources available is not a deficit.

  Most of the region's eight infrastructure areas have a system in place to address their immediate needs and prioritize their expenditures. However, most infrastructure planning is done without a framework that would coordinate long-term visionary planning with the short term capital expenditures. Integration of long range planning with current expenditures should be standard practice as it is with transportation and water supply.
One of the goals of the RCP in the IRIS Chapter is to create a planning framework that coordinates and links long-term goals with short-term capital expenditures across infrastructure providers. To accomplish this goal, the IRIS puts the most important pieces of the infrastructure puzzle on the table at one time, substantially improving the region’s opportunities to address needs in a comprehensive, not piecemeal fashion. Also, some providers are dependent upon sources of funding or behavioral changes that must take place in order for them to implement their strategic plans and accomplish their goals. For example, implementation of the RTP requires an extension of the TransNet ½-cent sales tax program, and meeting the energy, water, and solid waste needs of the region will require additional levels of recycling and conservation beyond what occurs today. If these behavioral changes do not occur as planned, the implementation of the strategic planning and capital budgeting will need to be adjusted to compensate.

The data sources for the capital improvement and operating budgets contained in the IRIS and its supporting Technical Appendices are the adopted budgets for the fiscal year 2003 from the local jurisdictions and agencies that provide and operate these eight areas of infrastructure. Tables 7.2 and 7.3 in the IRIS provide important information about how infrastructure providers within the region plan to allocate their resources for both capital improvements and operations and maintenance. According to these budgets, the region plans to spend approximately $8 billion during FY 2003 for operations and maintenance and more than $11 billion between FY 2003 and FY 2007 for capital improvements. Interested readers should also refer to the IRIS Technical Appendices for additional discussion (including expenditure and revenue data) of each infrastructure area.

The IRIS also identifies infrastructure areas with insufficient operating and capital improvement budgets or strategies to acquire needed resources, including the preservation of habitat and open space, storm water collection and treatment, and beach sand replenishment. The IRIS identifies a variety of funding sources or methods to obtain funding for these infrastructure areas and others, as shown in Table 7.1.

All infrastructure needs cannot be met immediately and timing is the key to ensuring the adequacy of infrastructure services and funding. The IRIS recommends a phased and incremental approach recognizing the need to provide all necessary infrastructure in a timely manner that reflects the completion of new development or redevelopment projects. The IRIS identifies a strategy and mechanism to accomplish this goal, beginning with the creation of an incentive and competitive based process that will prioritize the use of transportation funds based in part on the compatibility of the land use plans with transportation facilities. The RCP recommends that transportation funds be used as an incentive to encourage local jurisdictions to create smart growth opportunity areas; areas that are expected to improve the cost effectiveness and efficiency of dealing with the impacts from urban change and growth resulting in an improved quality of life in the region. Because the land use elements of general plans serve as a planning framework for developers and most infrastructure providers, any change in the general plans will need to be addressed in the capital improvement programs of most infrastructure and service providers. Thus a stronger transportation-land use connection will also result in a coordinated process to prioritize and synchronize capital improvement programs and strategic plans in other infrastructure areas, as illustrated in Figure 7.5 of the IRIS.
The RCP is based on the premise that we must plan for our future differently than we have in our past and we must act on those plans—striving to create an urban form that supports sustainable and balanced communities with a high quality of life. The region’s quality of life, as expressed in the Core Values of the RCP, is greatly affected by the quality of our infrastructure. As the San Diego region continues to change, we must regularly assess the ability of our infrastructure to keep pace and to maintain our quality of life at acceptable levels. As long as infrastructure expenditures are working towards long-term goals that are compatible with the goals and objectives of the RCP, then the region is making progress toward addressing our infrastructure needs in an efficient and targeted manner.

Finally, with regard to development impact fees, the IRIS does include a discussion of the use of development impact fees in the financing options section; they are categorized as fees and charges for current facilities and services. In addition, the proposed TransNet ordinance and ballot measure requesting residents to extend the existing ½ cent sales tax revenue program used to help pay for needed transportation improvements includes a provision for establishing a development impact fee to help pay for regional transportation facilities, as described in the IRIS Chapter.

Chapter 8 – Performance Monitoring:

- **Equity Indicators** – This section should contain EJ or equity indicators. Tracking economic indicators alone is insufficient. This data should also be tracked against race to ensure that all segments of the population are benefiting from the plan. So, indicators like income, housing accessibility, and employment numbers should be tracked across the different races. Additionally, there are no indicators to get at some of the proximity issues that plague EJ communities. Perhaps we could look at population living in mixed industrial/residential zones?

  **Staff Response:** We agree that the equity indicators could be strengthened, and where possible we will include information on race and ethnicity. While we do not have information on the population living in mixed-industrial/residential zones, we will be attempting to add periodic indicators that better address environmental justice and equity concerns.

- **Monitoring Performance of Service Providers** – Additional growth will place increasing demands on service providers; we should monitor the performance of service providers in responding to customer requests.

  **Staff Response:** The Performance Monitoring Chapter identifies both annual and periodic performance indicators related to the goals and objectives of the RCP. Measures of customer service indicators could be added as periodic indicators in topic areas that the plan addresses, such as energy and water supply.

Chapter 9 – Implementation:

- **Link Smart Growth Opportunity Areas (SGOAs) to Parks and Open Space** – Should mention that the establishment of a SGOA will be linked to the creation of more parks and protected open space.
Staff Response: The RCP defines smart growth areas as places that accommodate, or have the potential to accommodate, higher residential and/or employment densities. They are pedestrian-friendly activity centers that are connected to other activity centers by transit or could be in the future. While some general principles may apply to any smart growth area, local character will influence how it is manifested. Open space is an important element of that local character.

The RCP promotes focusing future population and job growth away from rural areas and closer to existing and planned job centers and public facilities. It promotes the protection of agricultural areas, natural systems, high-value habitat areas, and other open-space areas that define the character of our communities. And, it states that natural resources should be preserved. The RCP specifically mentions the unique physical features of our communities – canyons, river valleys, and coastal estuaries – as framing our cities and towns to provide natural boundaries. The habitat conservation plans influence future development and conservation patterns in the region, serving as a natural greenbelt winding through the region.

Additionally, language has been added to the Implementation Chapter, specifically, the "Guidelines for Strengthening the Local/Regional Plan Connection," encouraging protection of urban habitat areas and the provision of open space for recreation in Smart Growth Opportunity Areas.