APPENDIX A

Notice of Preparation and Letter Responses
APPENDIX B

Draft EIR Comment Letters and Responses
## Final EIR Comment Index
### Regional Comprehensive Plan

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May 18, 2004

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

Subject: Regional Comprehensive Plan for the San Diego Region. Draft Program EIR
SCH# 200101114

Dear Rob Rundle,

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 17, 2004, and the comments from the responding agency (ies) in (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's (n)undigit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final Environmental document. Should you need more information or clarification of the enclosed comments, I recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency
Governor’s Office of Planning and Research

This letter acknowledges receipt of the Draft EIR for review by the State Clearinghouse. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 17, 2004

Mr. Rob Rundle
Senior Regional Planner
SANDAG
401 B Street, Suite 800
San Diego, California 92101-423

Comments on the Draft Program Environmental Impact Report for the Regional Comprehensive Plan for the San Diego Region, California

Dear Mr. Rundle:

The California Department of Fish and Game (Department) has reviewed the draft Program Environmental Impact Report (DEIR) for the Regional Comprehensive Plan (RCP). SANDAG's cover letter to the DEIR indicates that the comments on the DEIR must be received by May 13, 2004. However, the State Clearinghouse due date is May 17, and, per section 15073 of the CEQA Guidelines, the public review period is to be at least as long as the review period established by the Clearinghouse. Please accept these comments into the record.

The RCP is the long-range planning document that addresses the region's housing, economy, transportation, environment, and overall quality of life needs. The RCP establishes a planning framework and implementation actions to increase the region's sustainability and encourage smart growth. Among the objectives of the RCP are to identify a preferred approach for regional growth through 2030, provide a framework for local jurisdictions to update local general plans and for infrastructure providers to update their regional infrastructure plans, support smart growth through the prioritization of regional transportation funds, encourage sustainable development by making land use decisions and infrastructure investments that are good for the environment, and provide the foundation for better land use and transportation integration for years to come. Overall, the Department concurs with the goals and approach of the RCP.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381, respectively. As a Trustee Agency, the Department reviews proposed projects, comments on their impacts, and determines whether the mitigation measures or alternatives proposed are adequate and appropriate. Pursuant to the California Endangered Species Act and other sections of the Fish and Game Code, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants (including rare, threatened, and endangered species), and habitat necessary for biologically sustainable populations of those species.
The Department offers the following comments to assist you in planning for the preservation of sensitive wildlife species and habitat types within the San Diego Region and to assist you in complying with pertinent Federal and State statutes and laws. We recognize that the programmatic nature of the RCP and this DEIR make it difficult to quantify biological impacts from the implementation of the RCP, and therefore to identify specific mitigation measures to compensate for impacts. Our comments are also general in nature.

1 The DEIR addresses the adopted and draft Natural Community Conservation Program (NCCP) Plans in San Diego County (e.g., the Multiple Species Conservation Plan). The DEIR makes a few statements which should be modified in the final EIR so that readers do not misinterpret the purpose of the NCCP Plans that have been adopted to date.

a. In the discussion of the potential impacts of the implementation of the RCP on wildlife corridors and wildlife movement, the DEIR states, “Because provisions in the subarea plans require that any modifications to the conservation areas result in an overall benefit to the natural resources, regional wildlife movement would be adequately protected” (page 5.10-11). Establishing biologically viable wildlife movement linkages and corridors is one purpose of the NCCP Plans. However, future projects that are implemented to reflect the RCP will need to prepare their own subsequent environmental documents and propose avoidance and mitigation measures; as the subarea plans do not provide the specific mitigation directives/requirements that will assure continued wildlife movement.

b. In the discussion of the potential impacts of the implementation of the RCP on wetlands, the DEIR states, “With respect to wetlands, most of the subarea plans have policies protecting this habitat type.” Appropriately, the DEIR then mentions the regulations to which projects affecting wetlands are subject. Most of the subarea plans and implementing regulations encourage avoidance of wetlands and establish mitigation ratios to be applied to compensate for the loss of wetlands on a project by project basis. However, the NCCP Plans do not provide a regional approach to the preservation of wetlands. We recommend that the final EIR clarify this point.

2. The DEIR proposes the following mitigation measure to address wildlife corridors. “For development projects provide for continued movement of ground-level wildlife across rights-of-way. Where there are designated wildlife corridors through the use of appropriately sized bridges or other openings where roads or transit features would create barriers” (page 5.10-15). It is not clear what “designated” means, and the term could be interpreted as meaning only those areas that have been identified as major wildlife movement areas in an approved subarea plan. There are other areas where wildlife movement warrants consideration, and future projects that are implemented to reflect the RCP should include their own assessment of potential wildlife corridor impacts and propose specific mitigation, if warranted. We recommend that the phrase “there are designated” be deleted and replaced by “the project or regional conservation plan has identified.”

3. The DEIR proposes the following mitigation measure. “Provide off-site mitigation
contiguous with areas of like resource to maximize the biological value of the habitat
provided as mitigation" (page 5 10-15). While off-site mitigation is the preferred mitigation
approach most of the time, it is not always. We recommend that this language be modified to
state that the mitigation should be directed to areas that are proposed for conservation and
that support similar habitat values.

Thank you for the opportunity to comment. Please contact Libby Lucas at (858) 467-4230
if you would like to discuss this response.

Sincerely,

William E. Tippets
Deputy Regional Manager

cc: U.S. Fish and Wildlife Service (John DiGregorio)
    State Clearinghouse
A-1 This comment provides introductory remarks and summarizes the project description. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

A-2 The Final EIR has been revised to include a statement noting that future development projects are required to prepare subsequent environmental documents and propose avoidance, if feasible, and mitigation measures for any unavoidable impacts on wildlife corridors and wildlife movement linkages. The revision is provided below and appears on page 5.10-13 of the Final EIR.

As noted above, specific transportation projects are included in the MOBILITY 2030 plan, which would be implemented as one of the transportation goals within the RCP. Potential biological resource impacts from these improvements were discussed in SANDAG’s RTP EIR (SANDAG 2003b). The EIR determined that large-scale transportation project would potentially result in an impediment to wildlife movement due to habitat fragmentation. This can substantially impact long-term viability of wildlife populations in the regions. Some of these impacts can be reduced through the incorporation of design features, such as bridges and large culverts in order to minimize effects to wildlife movements. However, much of the area that would be targeted for corridor development has an adopted or draft Subarea Plan, which identifies regional wildlife movement corridors. Because provisions in the subarea plans require that any modifications to the conservation areas result in an overall benefit to the natural resources, regional wildlife movement would be adequately protected. **Future development will be required to prepare subsequent environmental documents and propose avoidance, if feasible, and mitigation measures for any unavoidable impacts.** Should development be intensified, localized conflicts regarding movement corridors not addressed in the regional plan may occur. These impacts would be significant on the local resources.

A-3 The Final EIR has been revised to include a statement that while the subarea plans have policies protecting wetlands, it is not the intent of the subarea plans to provide a regional approach to the protection of wetlands. Please see page 5.10-14 of the Final EIR.

A-4 Mitigation measure Bio-2 has been modified to reflect the comment. The revised mitigation measure is presented below and appears in Table 1.6-1 and on page 5.10-17 of the Final EIR.
Bio-2 For development projects, provide for continued movement of ground-level wildlife across rights-of-way, where the project or regional conservation plan has identified wildlife corridors through the use of appropriately-sized bridges or other openings where roads or transit features would create barriers.

A-5 Mitigation measure Bio-3 has been modified to reflect the comment. The revised measure is presented below and appears in Table 1.6-1 and on page 5.10-15 of the Final EIR.

Bio-3 Biological mitigation shall be directed to areas that are proposed for conservation and that support similar habitat. These efforts shall be coordinated with resource agencies and regional habitat conservation and planning efforts.

A-6 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 11, 2004

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

Subject: Regional Comprehensive Plan for the San Diego Region – Draft Environmental Impact Report, SCH# 2004011141

Dear Mr. Rundle:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located outside the administrative boundaries of a known oil field. However, there are numerous idle or plugged and abandoned wells located within the Regional Comprehensive Plan boundaries. These wells are identified on Division map W-1-7 and in division records. The Division recommends that all wells within or in close proximity to project boundaries be accurately plotted on future project maps.

Building over or in the proximity of plugged and abandoned wells should be avoided if at all possible. If this is not possible, it may be necessary to plug or re-plug wells to current Division specifications. Also, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable an adequate gas venting system should be placed over the well.

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.
Mr. Rob Rundle – San Diego Association of Governments  
May 11, 2004  
Page 2  

To ensure proper review of building projects, the Division has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the Division's Cypress district office for a copy of the site-review packet. The local planning department should verify that final building plans have undergone Division review prior to the start of construction.

Thank you for the opportunity to comment on the Draft environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

[Signature]

Paul Frost  
Associate Oil & Gas Engineer
Letter B  Department of Conservation

B-1 This comment provides opening remarks and states the purpose of the Department of Conservation’s Division of Oil, Gas, and Geothermal Resources. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

B-2 Future development projects associated with the RCP will be required to undergo subsequent CEQA review. At that time, the identification of wells, including the presentation of them on a map, could occur.

B-3 Future development projects associated with the RCP will be required to undergo subsequent CEQA review. At that time, projects will be reviewed for their proximity to plugged or abandoned wells. Any project site that includes a previously plugged or abandoned well will be handled in accordance with Section 3208.1 of the Public Resources Code.

B-4 This comment indicates the availability of an information packet to assist future developers in the submission of plans to the Department of Conservation for review. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

B-5 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
April 27, 2004

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

Rob Rundle:

RE: Regional Comprehensive Plan for the San Diego Region, Draft Program EIR (SCH2004011141)

We have reviewed the EIR for the above referenced project and have the following comment:

The locations for recommended development include communities such as Valley Center, Fallbrook, Ramona, Alpine and Lakeside. The EIR also states that while most of the land areas recommended for development will occur as infill and redevelopment projects, a portion of this development will be on vacant land. Some of these unincorporated communities are located in areas of significant wildland fire risk. The EIR does not address the risks of wild fires on potential development. The San Diego Association of Governments should address this issue in the final EIR.

Thank you for the opportunity to comment on your EIR. If you have any questions regarding our comments, please contact Mary Ann Hadden, Associate Environmental Planner at (916) 845-8269.

Sincerely,

Dennis Castrillo
OES Environmental Officer
The RCP encourages densification along major transportation corridors and will thus concentrate development in areas that do not have a high potential for wildfire and where adequate fire protection resources already exist. However, the RCP anticipates that implementation of existing general plans would allow development to take place in remote areas adjacent to vegetation that could serve as fuel for wild land fires. These fire risks will be addressed by existing regulations in each jurisdiction. These include requiring emergency secondary access roads, architectural treatments (e.g., tile shingled roofs, reduced wood exteriors, and sprinklers), fuel management around development, and adequate fire protection services (e.g., water flow, hydrants). It is recognized that even with these measures, unavoidable loss of property and life may occur as a result of wildfires, particularly where people have chosen to build houses in or adjacent to high fuel areas.

Fire protection services were analyzed in Section 5.12 of the EIR. The analysis concluded that implementation of the RCP would result in significant impacts to local fire protection services, and may result in the expansion of fire protection facilities. Mitigation was identified to reduce this impact to below a level of significance at a program level, though it is recognized that approval of future projects by those agencies with land use authority will have to identify specific measures to ensure that specific projects do not result in significant unmitigated impact to fire protection services.
Ms. Carolina Gregor, RCP Project Manager
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Subject: Comment on Draft Regional Comprehensive Plan and Draft Program EIR

Dear Ms. Gregor:

The Transportation Corridor Agencies (TCA) are pleased to review and comment on the proposed Regional Comprehensive Plan. TCA is the builder and operator of Foothill Transportation Corridor South (State Route 241), a component of SANDAG’s Mobility 2035 Regional Transportation Plan. State Route 241 will be built with private funds, and completes the 42-mile Foothill Corridor which links Northern San Diego County to SR-91, the main east/west artery serving Orange and Riverside Counties.

Our comments focus on the manner in which Foothill Corridor South is included in both the Regional Comprehensive Plan and the PEIR. We request that SANDAG incorporate the following corrections and clarifications into the final version of the RCP and the Final Program EIR:

Draft Regional Comprehensive Plan

#1. Chapter 4B, page 57. As noted above, Foothill Corridor South (SR 241) is included in the Regional Transportation Plan. TCA wants to assure that Foothill Corridor South is clearly mapped and labeled on all transportation base maps illustrating the RCP text. Map 4.B.4 must clearly indicate SR 241 just south of the San Diego/Orange County line. Unfortunately, the current map stops at the southern edge of Camp Pendleton and does not show transportation facilities, including SR 241, in the northernmost portion of the County. To avoid any public misunderstanding, we request that this base map be amended to include the entire county.

#2. Chapter 4B, page 73. Recommended funding actions include #4, “Pursue financing opportunities such as user fees, congestion pricing, and private investments to help pay for needed transportation improvements.” Foothill Corridor South exemplifies this recommendation: it will be a priced facility constructed with private funds. However, the text in Chapter 4B does not address these forms of innovative funding. We recommend that the RCP include a discussion of pricing as a means of providing needed transportation infrastructure.

Draft Program EIR

#3. Transportation/Circulation, Figure 5.4.3, 2030 Mobility Network Level of Service. This map correctly depicts Foothill Corridor South at the upper left corner at the Orange County line. However, the facility needs to be labeled as SR-241 to avoid being confused as a continuation of I-5.

Thank you for ensuring that these changes are made in the final documents prior to SANDAG Governing Board approval.

Sincerely,

Macie Cleary-Millan
Deputy Director, Environmental Planning

125 Pala Road, Suite 100, Irvine, CA 92618-3004 • 1-800-653-3004 • 949/754-3400 • FAX 949/754-3407
www.sandag.org


Member: Anaheim Regional Transportation Commission, Orange County Transportation Authority, San Juan Capistrano, City of Lake Forest, Mission Viejo, Newport Beach, Irvine, San Clemente, San Juan Capistrano, Yorba Linda
Letter D  Transportation Corridor Agencies

D-1 This comment provides introductory remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

D-2 Due to time constraints, the base maps will not be modified for the final document, however, SANDAG has correctly labeled SR 241 where it does appear on some base maps as requested in the comment.

D-3 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

The recommendation for financing opportunities include user fees (i.e., toll roads) and private investments which includes a variety of funding sources, including the example noted in this comment. SANDAG will be looking at a variety of funding sources and this list was presented as an example of the most relevant sources.

D-4 Figure 5.4-3 in the Final EIR has been updated to identify SR-241.
May 13, 2004

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

COMMENTS REGARDING DRAFT PEIR FOR REGIONAL COMPREHENSIVE PLAN

The City of Carlsbad appreciates the opportunity to review the draft Program EIR (PEIR) for the Regional Comprehensive Plan (RCP). Carlsbad offers the following comments and questions regarding the draft.

Project Description (Chapter 3)

Unlike the Regional Comprehensive Plan itself, the PEIR offers a narrowly construed project description. To do this, the PEIR defines the region's existing, adopted general plans as the CEQA "no project alternative" and compares the collective capacity of these plans with the growth projected by SANDAG's 2030 Forecast. Under the forecast some 93,000 housing units will have to be "exported" to areas outside the region because the existing adopted plans do not have adequate land capacity on which to produce these dwelling units. The purpose of the Regional Comprehensive Plan, says the PEIR, is to recapture some fraction of those 93,000 dwelling units back into the region through 2030 and to expand the region's housing capacity through the addition of Smart Growth Opportunity Areas. Specifically, the PEIR defines the CEQA "proposed project" as that smart growth strategy that will recapture half (or 46,000) of the dwelling units that would otherwise be exported under the "no project alternative." Among several other project alternatives examined in the PEIR are strategies that capture larger and smaller fractions of that 93,000-unit export.

Comment: This project description provides a useful "distillation" of the rather large and complex RCP. The PEIR says the purpose of the RCP is to recapture 46,000 units back into the region using smart growth strategies so as to effect an expansion of the region's housing capacity and to provide the infrastructure, especially transportation, needed to support this expansion. Carlsbad suggests that the RCP would be a more useful, direct, and understandable document if it were amended to include the "project description" up-front and throughout. The RCP text currently contains much in the way of "process" (principally how to do smart growth and provide supporting infrastructure) and not enough to identify the purpose of the plan. The PEIR clarifies this purpose and defines the scope of the RCP. We urge you to consider amending the RCP to this effect.

Making Mitigation Contingent Upon Local Agency Action

Throughout the sections dealing with the analysis of impacts the PEIR identifies mitigation measures that only local governmental jurisdictions or state and federal agencies can implement. It then uses language that says these other agencies "shall" carry out the mitigation measure. Some of the mitigation measures call directly for local jurisdictions to make basic land use policy changes. An example is found in Section 5.1.5 of the Land Use section where mitigation measure LU 1 reads:
“LU-1. Local jurisdictions shall adopt land use plan amendments, including general plan amendments, local coastal program amendments, and amendment to the Port Mater Plan to eliminate inconsistencies between future land uses and densities identified in these plans as a result of implementing smart growth policies.”

Comment: Carlsbad questions the CEQA basis for a lead agency (SANDAG) to pre-commit another agency to implementing mitigation measures when the other agency has not yet determined whether it is a) able or b) willing to make the commitment.

With regard to being able to implement the mitigation, some local actions depend upon third-party agency approvals in order to implement policy changes. For example, a coastal city may agree to a policy change to its Local Coastal Plan, however such a change would also require the approval of the California Coastal Commission, which approval may or may not be forthcoming. In the above example, the city would not alone control the ability to implement the required mitigation measure. With regard to being willing to implement the mitigation measure, there would appear to be fundamental jurisdictional issues that need clarification in the PEIR.

Section 3.6 (page 3-15) discusses the "Intended Uses of the PEIR." This section should be expanded (or a new section created) to describe more clearly how SANDAG believes it is empowered to require other agencies (who may also be subject to approvals by other jurisdictions) to make specific land use policy decisions and implement other mitigation measures. This discussion should also clarify how the PEIR can cite mitigation as being adequate when there is no guarantee that the particular mitigation measure will be implemented by all of the other entities with that charge. Without the consent of implementation by all of the mitigating entities it seems that the significant impact would remain, at best, only partially mitigated, and therefore, remain significant. Please clarify your theory of mitigation in these examples where a given mitigation measure is assigned to be the responsibility of multiple entities other than the lead agency.

Factoring the Impacts of Inter-Regional Housing Shifts.

Most of the project alternatives are concerned with capturing some fraction of 93,000 housing units back into the study area (the San Diego region) that would be exported from the study area under the No Project alternative.

Comment: It is not clear how all of the impacts associated with these shifting 93,000 housing units are addressed under the various project alternatives. Wherever 93,000 housing units are located, there are going to be significant associated impacts in such areas as energy consumption, water consumption, waste generation, local and commuter trips generated, etc. When the units are exported from the study area the associated impacts are also removed from the study area, but put into areas that receive the units. When all the regions are taken together these types of effects are a zero-sum for the most part. Yet, it appears that the focus of the PEIR is on the impacts that result to the study area alone under the various alternatives. If taken separately, the movement of up to 93,000 housing units from the study area to another area is of major consequence to both areas, and the project alternatives have varying impacts to both areas. These matters would likely be of great concern to, say, Temecula, southern Orange County, and the other areas that would receive the 93,000 homes. But, on reading the PEIR, it is not clear how these shifts of impacts are factored into the overall impact analyses. It is agreed that exporting 93,000 homes from the region will likely have, for example, inter-regional traffic and vehicular energy impacts. But, to some degree, these impacts will be offset by the removal from the region of local trips congestion and non-commuter-related energy consumption. The impact to overall traffic congestion and overall energy consumption for both the study area and the external area must factor in all of the component...
Comments on RCP PEIR
May 12, 2004
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impacts. Project alternatives that re-capture those housing units into the region yield just the reverse of these impacts.

Admittedly these offsetting effects make for a rather complex calculus to determine net impacts in the various impact areas. However the effects are real and are deserving of being evaluated in some manner for a full and rigorous impact analysis. To this end the PEIR should speak to how these offsetting effects are handled in the various analysis sections, or, if offsetting effects have yet to be factored in, then they should be addressed in a meaningful way through the addition of appropriate analyses.

Land Use Section – Significance Criteria (Chapter 5, pages 5.1-16 to 17)

Under its earlier section on “Method of Analysis” the PEIR identifies six issue areas under the heading of “Urban Form.” Section 5.1.3 lists the “Significance Criteria” for both regional and localized impacts. The RCP would have a significant land use impact if the project would do any of the several things on the list of possible effects.

Comment: Based upon the third bullet under Urban Form, the document should add the following to the “localized” impacts on page 5.1-17: [A project alternative would have a significant impact if it would create] “A major change to the unique sense of place of existing communities, while allowing flexibility for changes.”

Alternatives Comparison (Chapter 6)

We have several comments:

1. Rejected Alternatives (a). The chapter lists several alternatives that were considered but rejected for analysis. In most instances the discussion on each rejected alternative consists of only a paragraph. Most of the text is directed at rationalizing why the alternative was rejected. In a couple of instances the description of the actual alternative is so brief as not to be understandable. An example is the “Directed Smart Growth Alternative,” described in its entirety as: “…a means of reducing the overall regional impacts of the Proposed Project.” This description is simply insufficient to understand the alternative. In order for the reader to follow the reasons for rejecting alternatives enough information should be included to understand what each would call for. This information is missing in most instances.

Comment: Please consider expanding the descriptions so that the reader can have at least a basic understanding of each rejected alternative.

2. Rejected Alternatives (b). The “Reduced Economic Growth Alternative” would restrict the amount of employment space available in the region by limiting the development of non-residential floor area for a 20-year period. The PEIR rejects this alternative because SANDAG did a model to this effect in 2001 in which the simulation did not show a loss in overall employment compared to the baseline forecast because employment densities increased on the remaining land. It was also rejected because: of concerns about loss of sales tax; local development agencies have a tradition of encouraging jobs creation; the claim that “…[t]he connection between job growth and population growth is less obvious than the connection between housing and population”; the observation that “…local governments have little experience in restricting economic development…”; and the observation that the alternative would not capture any of the 93,000 housing units that are expected to be exported.
Comment: The 2030 forecast tells us that, while we run out of housing land by around 2025–2030, we will continue to have jobs-creating land until past 2040. This suggests a jobs/housing imbalance in the capacities of the region’s plans. We suggest the alternative could be re-articulated. Instead of artificially trying to slow down the rate of jobs creation, land could be simply shifted from jobs-creating land classes to residential. This would have the effect of adding to the residential capacity of the region, while reducing the surplus of jobs that is a major factor in driving growth. SANDAG tells us that natural increase and jobs-creation account for 60% and 40%, respectively, of future growth through 2030. In contrast to the reason stated above for rejecting such an alternative, this observation is a direct and obvious connection between population growth and jobs. This new alternative would directly address the export of 93,000 housing units by both reducing the number of housing units needed by 2030 (through jobs and population reductions) and by providing more land within the region on which to put the housing that does occur. Under this scenario, it is possible that SANDAG’s model might be correct and some of the jobs would simply increase employment densities, but, nevertheless, housing capacity would be increased. Yes, it could potentially intensify the “fiscalization” of land uses on the remaining non-residential lands. However, a major thrust of the Economic Prosperity chapter of the RCP calls for restructuring the fiscal basis for land planning, including tax sharing among governments. If the main purpose of the RCP is to recapture 46,000 housing units that would be exported under current plans, then this alternative would speak directly to that purpose. Claims that it’s “traditional” for local governments to encourage jobs, that local governments don’t have experience in this area, etc., simply say that this is a new approach to the problem. The same claims could be made for the smart growth strategies for which the plan does call: we don’t have experience, it’s not the traditional way of doing things, etc. The PEIR should include this revised alternative and evaluate it for its environmental consequences.

3. Use of Project Proposal As the “Base” For Comparing Alternatives. Table 6.3-1, on page 6-37, compares the environmental impacts of all of the alternatives. Each of the thirteen issue areas is scored on a scale of from 1 to 5. The Project Proposal is scored uniformly as all 3’s, irrespective of the alternative’s actual environmental impact on the issue, as evaluated in the main report. The other alternatives are scored as being relatively either better or worse than the Project Proposal. This approach contains problems.

First, it gives a bias to the Project Proposal while understating its actual impacts. For example, the Proposed Project alternative has significant, immittigable impacts in several areas, the highest impact the document uses. However, by scoring such an impact a “3” in the table it implies that the impact is only “middling” in effect. If another alternative is also significant and immittigable, but might be slightly more onerous than the Proposed Project alternative, its score is typically shown as a “4” (worse than the Project Proposal). This artificially creates a distinction that that is without merit, as both impacts are significant and immittigable, thus creating a bias in favor of the Project Proposal.

Comment: A better way to show the comparative impacts would be to base them upon an absolute scale of impacts. Currently, while there is no numerical scoring done in the analysis sections, there are findings in each section of “no impact,” “impact, but not significant,” “significant impact, but mitigable,” etc. These classifications should be the basis for assigning a numerical score. Using this method, each analysis section would conclude with both the current text description of the impact plus a numerical description. Both the text and the final numerical score in each analysis section should be shown in a “bottom line,” highlighted typeface (perhaps in a box to set it off) with the numerical score transferred directly to Table 6.3-1.

A second problem with the current method is that the relative scoring is subjective. How much more (or less) an alternative’s impact is, relative to the Proposed Project, is not discernable in
any rational, quantifiable way. Yet, the table uses a numerical scoring system. Absent a
numerical score based upon the absolute degree of impact (as is suggested in the previous
paragraph), the determination that the impact of an alternative is worthy of a "4" or a "5" (if it
appears to be relatively more impacting), or a "2" or a "1" (if it appears to be relatively less
impacting) than the Project Proposal appears to be highly subjective.

Comment: These limitations need to be discussed, in at least a note to the table if not in the
main text. Because of the subjective nature of the individual scores, the total scores are even
less meaningful. It would be highly appropriate to state that total scores that vary by some
appropriate range are not significantly different. We would suggest that the range is at least
three points, but it might actually be as much as four or five. Using only three points would
indicate that there is no significant overall distinction between the Proposed Project and all but
the "Urban Growth Boundary" alternative. The PEIR should not imply distinctions where they
probably don’t exist.

These are very critical points. Decision-makers and the public may seize upon differences of a
point or two between impact total scores in order to make distinctions between the environmental
consequences of the alternatives. However, such distinctions would be without merit. Making
the above changes may be the most important things SANDAG can do in the final PEIR with
regard to their practical and political significance.

4. No Project – Existing Plans Alternative – Energy. On page 6-10 the PEIR says that this
alternative "...will have significant energy impacts because it will not implement the energy
conservation actions used by the RCP...These energy conservation actions include: promoting
development regulations and design standards to maximize energy efficiency that will reduce the
costs associated with energy consumption within the region; promoting local production of cost-
effective, environmentally sensitive energy resources, including wind, solar, and geothermal, to
reduce our dependence on imported energy..." Please justify this statement. How would the No
Project alternative (or any of the reviewed alternatives) preclude implementing these types of
energy conservation actions?

Population/Housing/Employment – Possible Calculation Error and Related Findings Of
Impact

In section 5.2, the PEIR examines possible impacts in the area of population, housing, and
employment. One of the impact "test" questions in this section is: "Would the RCP result in an
increase in the average residential density in the RCP study area of greater than 3 percent above
the average density which is forecast to prevail in the 2030 without the project?" If the answer is
"yes" then a significant impact is indicated. On page 5.2-5, Table 5.2-4 provides data from which are
calculated residential densities for 2030 both without the RCP (density = 1.81 units per acre) and
with the RCP (1.87 units per acre). The text concludes that these data show that the 3% threshold is
not exceeded and, therefore, the impact is less than significant. No calculation is provided to
support the conclusion, however.

Comment: Our calculations indicate that the 3% threshold is, in fact, exceeded. We believe the
correct formula should be:

\[
\text{Test value} = \frac{(\text{Density with RCP}) - (\text{Density without RCP})}{(\text{Density without RCP})}
\]

\[
= \frac{(1.87 \ DU/Ac) - (1.81 \ DU/Ac.)}{(1.81 \ DU/Ac.)}
\]

\[
= 3.3%.
\]
Comments on RCP PEIR
May 12, 2004
Page 6

This calculation suggests that the test threshold of 3% is exceeded and, therefore, a significant increase in density would occur, resulting in a significant environmental impact.

Please confirm the calculation. We suggest adding it to the table, and modifying the conclusions of the PEIR, accordingly.

In addition, the first sentence under this topic (bottom of page 5.2.4) reads: “As shown in Table 5.2-4, implementation of the RCP would result in a minimal increase in residential density at the regional level [emphasis added].” The use of the word “minimal” seems inappropriate given that the change in density creates a significant impact. The word “minimal” should be removed from the sentence.

Conclusions

The draft PEIR is a serious and comprehensive attempt to evaluate the environmental implications of a major policy initiative for the entire region. By its nature, this is a difficult task to undertake. The draft, however, makes a good effort in this area. The suggestions Carlsbad has made are offered in the spirit of making for a better document that will be of greater use to individuals and agencies who will use it. We thank you for the opportunity to review it.

If you should have any questions regarding anything in this letter, please feel free to contact me by mail at the address below, by phone at (760) 602-4609 or by e-mail at dtur@carlsbad.ca.us.

Cordially,

[Signature]

DENNIS A. TURNER
Principal Planner.

DT:bd

c:    City Manager
      Assistant to the City Manager
      City Attorney
      Deputy City Engineer - Johnson
      Community Development Director
      Planning Director
      Assistant Planning Director
This comment provides opening remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

The 46,000 unit figure was included in the EIR for analysis purposes only. It is not the goal of the RCP to precisely add 46,000 units to the region. Language has been added to the RCP to clarify the intent of increasing housing capacity in the region to meet the demand created by projected job and population growth. The RCP outlines goals, policy objectives, and actions to improve quality of life in the region. As local agencies identify locations for future smart growth development, detailed analysis will have to be conducted to ensure adequate facilities are available to support that growth. The RCP is a framework to guide that future growth, but would not enable that growth to occur. It is up to the local land use authorities to make those decisions when the time is appropriate for each local agency.

SANDAG recognizes that third party agency approval may be required; however, pursuant to State CEQA Guidelines Section 15126, SANDAG is required to identify the feasible mitigation measures. Specifically, Section 15126.4 states:

“An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy”

Additionally, CEQA Guidelines Section 15091(a) states that a lead agency may make findings that changes or alterations in the project are within the responsibility and jurisdiction of another agency making the findings, and such changes can and should be adopted by such other agency.

“No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.”

The possible findings include, as noted in 15091(a)(1) and (2):

“Changes or alternative have been required in, or incorporated in, the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR, and such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.”
Therefore, the EIR had to identify feasible mitigation measures. In the event of land use inconsistencies, the underlying land use plan must be amended to eliminate the inconsistencies. If the plans are not modified, then no project could go forward. SANDAG will need to make Findings that such mitigation is the responsibility of another agency. If mitigation measures cannot be implemented (found feasible at subsequent review), then the lead agency with land use authority will need to prepare a Statement of Overriding Considerations for any significant and unmitigated impacts.

Finally, the responsible agency will only need to consider the RCP EIR mitigation measures if they plan to adopt the RCP. If they are not relying on the document, then they need to do their own environmental review, identify impacts and identify mitigation measures to reduce impacts.

E-4  As noted in response to comment E-3, an EIR needs to identify feasible measures which could minimize significant adverse impacts, and the finding can be made that these measures are the responsibility of another jurisdiction.

E-5  The analysis in the EIR focuses on the environmental impacts associated with the addition of housing units beyond what is planned within existing general plans. The analysis considers both a plan-to-ground and a plan-to-plan analysis.

It is noted in the EIR that relocating housing units from other areas (southwest Riverside County, southern Orange County, Imperial County and Northern Baja) will have a “beneficial impact” as well. For example, the Public Services/Utility System conclusion related to school facilities, it states the following:

The increase in population associated with implementation of the RCP will require new or expanded school facilities. This represents a significant impact. General population growth within San Diego County would require the expansion of school facilities, but implementation of the RCP further increases the need for new or expanded facilities. While this increase will further impact San Diego County service providers, it will result in proportionate reductions in impacts to Riverside, Orange, and Imperial counties and in Baja California. [Emphasis added].

This concept is discussed similarly in the Land Use section (page 5.1-18). However, as noted in the comment, it does make for a complex calculation to determine the net impacts. Due to a variety of issues, it is speculative to ascertain which school districts will be affected by the “capture” of units. Due to the programmatic nature of the project, it is infeasible to quantify most of these “offsetting effects”.

Pursuant to CEQA Guidelines Section 15145,
“If, after through investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impacts.”

Additionally, Section 15146 states

“The degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.”

Thus, the analysis presented in the EIR addressed the impacts to the extent feasible.

E-6 The six bullet items presented on page 5.1-16 of the EIR are policies and objectives from the RCP that were determined to be relevant to the area of Land Use. The thresholds presented in Section 5.1.3 consider these policies and objectives and how implementation of the RCP, including the policies and objectives, would affect the environment from an adverse or beneficial perspective. The addition of the suggested criteria is not necessary to provide an adequate level of analysis for localized impacts.

E-7 The descriptions of the Directed Smart Growth Alternative and the 100 Percent Capture Alternative have been expanded. The new summaries are provided below and provided on page 6-2 of the Final EIR.

The Directed Smart Growth Alternative describes a scenario where all of the growth would be directed into a few portions of the region. Under this alternative, the number of housing units proposed for capture (46,000 units) would remain the same.

The 100% Capture Alternative represents the scenario when all 93,000 housing units would be captured within the SGOA. This scenario represents over a 100% increase in the number of units compared to the Proposed Project.

E-8 State CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives to the project. Pursuant to Section 15126.6(c) the range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The commenter is proposing a reduced industrial capacity alternative. A similar alternative, the Reduced Economic Growth alternative was included in the EIR.

One important point of the Prosperity chapter is the relative importance of “traded cluster” employment to the region’s rate of growth in its standard of living. Jobs in these traded clusters, which represent about one-third of total employment are primarily responsible for the growth in the regions standard of living. The RCP
recognizes the importance of these jobs to the region’s future prosperity, and the need to plan for their success, including sufficient land for expansion and protection from non-compatible urban encroachment. A recent study by SANDAG, in cooperation with the Regional EDC, showed that the region’s supply of immediately available “industrial” land is in very short supply. Industrial land is the type that has accommodated much of the employment in traded clusters. One of the recommendations of the Employment Lands Inventory is to increase the amount of immediately available employment land, not reduce it as suggested by the authors comment.

This comment further discusses the purpose of the project, but misrepresents the main purpose of the RCP, suggesting that it is to recapture 46,000 housing units that would be constructed in southern Riverside County without a change in the General Plans of jurisdictions within the San Diego region. The purpose of the RCP is to improve on existing growth patterns by implementing a wide range of quality of life objectives.

The forecasting process behind the RCP uses land use information (land use elements of General Plans) from each of the 19 jurisdictions to help determine the capacity for growth in the region. Using the land use elements of general plans provides the basis of one scenario of capacity and the guidelines for spatial distribution of growth (population, housing units, employment, etc.). In turn, this base case scenario is used to estimate many impacts, including air quality and traffic congestion, that together make up the region’s quality of life.

The RCP analyzes this base case scenario and asks whether it can be improved upon using standard local government policy options. Improved upon, here, means improve 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 life (compared with the base case) is for jurisdictions in the region to embrace and implement “smart growth” land use policies. SANDAG believes public policies can influence the quality of life and “how” and “where” growth occurs in the context of the RCP is more important than “how many”.

Many of our cities are engaged in smart growth practices today, including some of our “built out” cities. These and other smart growth areas in the region are changing the how and where growth is occurring; building housing and service employment in close proximity to each other and alternative public transportation; all designed to help improve the region’s quality of life, including reduce traffic congestion and improve air quality. The success of growth in these downtown and other communities is a testament to the popularity and willingness of existing and new residents of the region to embrace and support smart growth.

Smart growth planning improves the efficiency and effectiveness of the way we will utilize resources, resulting in an improved quality of life. In other words, if the 46,000 housing units were located in Riverside, our quality of life, including
air pollution and traffic congestion, would be worse, than if the units and people were located in the San Diego region in smart growth communities.

State CEQA Guidelines Section 15126.6(d) provides guidance on the evaluation of alternatives, including the statement that the alternatives are to be compared to the Proposed Project. Specifically, Section 15126.6(d) states:

“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”

Therefore, to accomplish a comparison the scale needed to have room higher and lower because some of the impacts for the alternatives were beneficial, and some were adverse, when compared to the Proposed Project. Therefore, the Proposed Project was assigned a value of 3. Then, an alternative that had a slight benefit got a rating of 2, a great benefit a rating of 1. Conversely, if an impact was negative, there were two available ratings to allow for comparison of the magnitude. It is fully recognized that from a CEQA perspective some of these impacts were significant (or less than significant) for all alternatives. However, from a comparison standpoint, some of the impacts were at a greater or lesser degree of magnitude compared to the Proposed Project. The comparison in Table 6.3-1 was not intended to depict the significance of impacts. That analysis and comparison were included in Section 1 (Executive Summary) and Section 6 (Alternatives) of the EIR. Table 6.3-1 has been revised in the Final EIR to remove the totals at the end of the table.

Pursuant to CEQA Guidelines Section 15145,

“If, after through investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impacts.”

Additionally, Section 15146 states

“The degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.”

In conclusion, Table 6.3-1 provides a tool for comparison of the alternatives with the proposed project. Aside from the modification noted above (removing the total from the columns), no changes were made to the comparison table based on this comment.

If the RCP is not implemented, these energy conservation actions are not specifically precluded from happening, as noted by the comment. However, there is no guarantee that these measures would be implemented. Since these conservation strategies are built into the RCP as specific goals and objectives, the
No Project Alternative was not assumed to have implemented these energy conservation actions.

E-11 The comment correctly identifies an error in the analysis of regional density impacts. Upon further review, the impact conclusion has been revised to include a finding of a significant and unmitigated impact. Please see pages 5.2-5 and 5.2-6 of the Final EIR.

The change in this issue area from less than significant to significant and unmitigated does not require recirculation pursuant to State CEQA Guidelines Section 15088.5(a). This section states:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043

The Draft EIR identified other significant and unmitigated impacts within the Population/ Housing/Employment analysis section, including significant and unmitigated impacts related to local housing, local population, regional housing, and regional population. Therefore, because no new impacts were identified,
(significant impacts to Population/Housing/Employment had already been identified), the EIR does not require recirculation.

E-12 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 13, 2004

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

RE: CITY OF CHULA VISTA COMMENTS ON THE DRAFT PROGRAM EIR FOR THE REGIONAL COMPREHENSIVE PLAN (SCH # 2004011141)

Dear Mr. Rundle:

The City of Chula Vista is transmitting the following comments on the draft Program Environmental Impact Report (PEIR) for the Regional Comprehensive Plan, for which the City is identified as one of the "responsible agencies."

General Comments

The proposed project description (Section 1.4, page 1-3, second paragraph) states that once smart growth opportunity areas "...are designated by local jurisdictions for development types, densities and intensities consistent with the goals of this Plan, transportation facility improvements and other infrastructure will be targeted to these areas." In Chula Vista’s General Plan Update process, the City is on course to support designation of smart growth opportunity areas. While the City has the ability to prioritize resource allocations at the local level, commitments for the regional resources needed to successfully implement the program are also crucial. Mitigation measures listed in the draft PEIR rely heavily on local actions to support and implement the RCP. The PEIR should address how the implementation of such measures by local jurisdictions will be enforced. A commensurate commitment to regional actions and resources is critical. This would greatly assist in obtaining public endorsement and support for plans in smart growth opportunity areas.

The City has worked actively with SANDAG and others on defining smart growth opportunity areas, and will continue to proceed cooperatively with SANDAG on confirming the location of such areas in the City of Chula Vista. Understanding what assumptions were made in the impact analysis about distribution of the approximately 46,000 dwelling units that would be accommodated within the region under the RCP would be helpful.
Impacts and mitigation are generally described in terms of the life of the plan through 2030. As expressed by the City of Chula Vista in previous comments on the draft Regional Comprehensive Plan, and other related documents such as the Regional Transportation Plan, the City is accommodating a large share of regional growth, particularly in the near term, in a manner largely consistent with proposed RCP policies. However, because funding for some regional public facilities may not be targeted until later in the planning period, the PEIR should acknowledge that there might be considerable delay in mitigating certain significant impacts at the local level.

Specific Comments

The following comments are referenced to a particular page or section number of the draft document.

Page 1-18, Executive Summary. Mitigation Measures need to be specified in the second box down. (It appears that the "Vis-1 through Vis-5" reference in the third box may be misplaced.)

Page 5.1-6, First Paragraph, Last two sentences. Please delete "...into undeveloped agricultural area", and revise the last sentence to: "The urban villages of Otay Ranch are developing with compact core areas that emphasize pedestrian opportunities and transit-oriented design."

Page 5.4-2, Table 5.4-1, Existing Peak Hour Regional Freeway LOS. Several segments of the freeway network shown in Figure 5.4-1, such as I-5 south of I-8, I-805, and SR-54, are omitted from the table.

Page 5.4-18, Mitigation Measure Trans 1. This mitigation measure addresses localized traffic impacts and refers to the potential implementation of congestion management strategies identified in SANDAG’s CMS Toolbox, many of which involve regional programs and/or funding that are beyond the control of local jurisdictions (e.g., transit system expansion, HOV/HOT lanes, advanced traveler information). As a result, it may not be possible for local jurisdictions to implement many of these strategies individually on a project-by-project basis, as this measure seems to suggest. Therefore, the respective responsibilities of local jurisdictions and SANDAG in implementing congestion management strategies to mitigate localized traffic impacts should be clarified in this mitigation measure. As previously suggested, the regional role and commitment (i.e., funding priority) in addressing such impacts in a collaborative manner with local governments is key to achieving local support for the type of growth envisioned in the RCP.

Page 5.12-14. Public Services/Utility Systems. Proposed Mitigation Measure ServSys-6 seems to suggest that public facility finance fees will pay for services.
Such fees are generally required to be devoted to funding of capital facilities and not to personnel and operating costs, which are funded through other sources.

Thank you for the opportunity to comment on the draft Program EIR for the Regional Comprehensive Plan.

Please contact Mark Stephens of the City Planning and Building Department at (619) 409-5959 or mstephens@ci.chula-vista.ca.us if you have any questions regarding these comments. We look forward to continuing to work with SANDAG and other Regional Comprehensive Plan participants in completing the review and adoption process, and implementing the plan.

Sincerely,

[Signature]

James D. Sandoval
Director of Planning and Building

cc: Honorable Patty Davis, City Council member  
David D. Rowlands, Jr., City Manager  
George Krempi, Assistant City Manager  
Ed Batchelder, Deputy Planning Director  
Alex Al-Agha, City Engineer  
Marilyn Ponseaggi, Environmental Review Coordinator  
Mark Stephens, Principal Planner  
Paul Hellman, Environmental Projects Manager

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This comment raises the question of enforcement of proposed mitigation measures by local jurisdictions. Since SANDAG does not have land use authority, it does not have enforcement capabilities for many of the mitigation measures. State CEQA Guidelines Section 15126.4 requires that an EIR identify feasible measures which could minimize significant adverse impacts. Additionally, pursuant to Section 15091, a lead agency (SANDAG) may make findings that changes or alterations in the project are within the responsibility and jurisdiction of another agency (SANDAG member agency) making the findings, and that such changes can and should be adopted by such other agency.

SANDAG recognizes the City of Chula Vista's participation in the RCP process and appreciates the City's commitment to proceed cooperatively. The EIR identified additional growth as a basis for analysis, otherwise it would be difficult to prepare any sort of meaningful environmental analysis for goals and policy objectives that could be implemented in many ways. While the EIR did identify an additional 46,000 units to those that are already expected to be built in the region through 2030, it is not know where they would occur other than to assume they could be built adjacent to existing and future transit corridors in SGOAs. Additionally, it was recognized that select areas in the unincorporated areas of the County could also support additional capacity. The EIR was a program level document, and provided a level of analysis proportionate to the level of specificity that was provided. Once jurisdictions go through the planning process that Chula Vista is currently undergoing, distribution of the units can be identified where additional growth can be adequately supported and project level impacts investigated. Additionally, mitigation measures can be evaluated at that time.

The RCP recognizes that smart growth is not a one-size fits all proposition. The Urban Form chapter of the Revised Working Draft RCP (dated May 24, 2004) contains a matrix showing smart growth in seven distinct categories, and provides a regional framework for local land use decisions and plan amendments.

The EIR recognized that there may be a delay in mitigating impacts at the local level as improvements catch up with the development. Specifically, with regard to traffic, the following discussion is provided on page 5.4-19 of the EIR:

It is important to note that there may be interim adverse conditions on some of the regional roadways that will ultimately improve from LOS F to LOS E. Implementation of the RCP does not result in an “instant fix.” The plan will modify the land use and transportation networks over the next 26 years. Some portions of the regional roadways network may get worse before they get better.

The Final EIR has been revised to include the mitigation measures for the impact related to increased density in existing neighborhoods resulting in buildings that
are of different bulk and scale than existing structures. These were inadvertently omitted in the Draft EIR. Implementation of mitigation measure Vis-1 will reduce this impact to below a level of significance.

F-5 The Final EIR has been revised to reflect the change requested in this comment. The revised mitigation measure appears below, and on page 5.1-6 of the Final EIR.

Chula Vista is expanding rapidly to the east. For example, construction is underway on the 23,000-acre master planned community of Otay Ranch. The urban villages of Otay Ranch are developing with compact core areas that emphasize pedestrian opportunities and transit-oriented design.

F-6 The Final EIR has been revised to expand Table 5.4-1. The table now includes an expanded listing of LOS for a larger number of regional network segments.

F-7 The Congestion Management Strategies identified in mitigation measure Trans-1 is a list of potential strategies that can be used by the local jurisdiction. SANDAG recognizes that some of these items are beyond the scope of local jurisdiction; however, for those strategies that are applicable to the local jurisdiction, they should be considered as possible mitigation measures for future projects.

F-8 The mitigation measure states that the payment of fees will assist in funding. It is recognized that personnel and operations are typically funded by the local jurisdictions through their General Fund or other sources.

F-9 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
April 13, 2004

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

Dear Mr. Rundle:

On behalf of the City of Coronado, I submit the following comments on the Draft Program Environmental Impact Report for the Regional Comprehensive Plan.

A central tenet of the Plan is that policies should be used to focus development into selected “Smart Growth Opportunity Areas” in order to minimize the negative impact of expected growth on the region. However, the draft PEIR misstates the Plan’s impact on some of the region’s communities, particularly on Coronado. Impact Analysis section 5.1.4 notes (in part) that:

“The RCP identifies Smart Growth Opportunity Areas (SGOA) (Figure 3.4-1). The SGOA represent the areas targeted for more intensified land use.”

This Section also notes:

“Other jurisdictions (i.e., other than the Cities of San Diego and Chula Vista, and the County) within the San Diego region will need to prepare land use assumptions to increase opportunities for mixed use and more intensive land uses in feasible locations, particularly near transit centers along existing and planned transportation networks.”

When Figure 3.4-1 is reviewed, one finds that Coronado is designated on a Map titled “Smart Growth Opportunity Areas” as an area that has “Potential Capacity.”

Neither the Plan nor any other document has designated any portion of Coronado as a “Smart Growth Opportunity Area”. Coronado historically was developed using principles that would now be termed “Smart Growth”. Coronado’s commercial, employment, civic and high density multiple family residential nodes are oriented to its transit corridors, and readily comply with Smart Growth density and intensity tenets. Coronado is a Smart Growth area that is fully developed at density levels that do not permit it to accommodate more growth. To suggest in the
Mr. Bob Rundle  
April 13, 2004  
Page Two

PEIR that Coronado must modify its General Plan, Local Coastal Program and Municipal Code in order to conform to the RCP concepts neither reflects the RCP’s content nor the conclusions and recommendations arrived at by the RCP technical advisory committee. To the contrary, the PEIR should acknowledge that existing Smart Growth areas such as Coronado do not need to modify their land use regulations in order for the region to achieve its RCP goals.

If you have questions concerning these comments, please feel free to contact me at (619) 522-7326.

Sincerely,

[Signature]

Tony A. Peña  
Director of Community Development

cc: City Council  
    Mark Ochenduszko, City Manager
Letter G  
City of Coronado

G-1  This comment provides opening remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

G-2  SANDAG recognizes that land use patterns within some local jurisdictions already incorporate elements of smart growth. However, based upon a review of the existing land uses at a regional level, it appears that additional capacity may be available within a ¼ mile area around regional transit service corridors. Further analysis will occur to identify specific SGOAs. Once the SGOAs are identified, the case may be that the land use (residential) and the density proposed by the RCP may be inconsistent with the land use planning documents of local jurisdictions. If this is the case, then a general plan amendment would be required in order to remedy the inconsistency. If there are no inconsistencies between the uses and densities proposed by the RCP and the adopted land use planning document of a local jurisdiction, then no change would be required.

The RCP recognizes that smart growth is not a one-size fits all proposition. The Urban Form chapter of the Revised Working Draft RCP (dated May 24, 2004) contains a matrix showing smart growth in seven distinct categories, and provides a regional framework for local land use decisions and plan amendments.
May 17, 2004

Gary Gallegos
Executive Director
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Re: City of Del Mar Comments on the Draft Program Environmental Impact Report (EIR) on the Regional Comprehensive Plan (RCP)

Dear Mr. Gallegos,

The City of Del Mar appreciates this opportunity to review and comment on the Draft Program EIR. The RCP itself is testament to the major countywide effort that took place over the past two years to provide the framework for planning the future of the San Diego region.

The RCP has made great strides in identifying what needs to be changed in our local and regional policies and practices to adequately maintain the quality of life benefits that the San Diego region is currently known for.

As we noted in our letter on the Draft RCP in March of this year, it is our belief that one of the most important pieces of the puzzle will be the realistic measurable standards and criteria that have yet to be identified in the RCP to monitor and assess the region's progress on the policy objectives. We understand these specific indicators, standards, and criteria for tracking the plan’s progress will be identified in the next few months. We look forward to reviewing and commenting on the final proposals as appropriate. It will be important to be able to assess how we are doing and if we are on the right track for improving the quality of life for future generations. Del Mar supports the goal of completing the identification of these standards and criteria for inclusion in the final RCP.

If the Regional Comprehensive Plan is to accomplish its goals for the region, measurable standards will be required to judge our progress. It will also be necessary that all agencies in the region incorporate the recommended policy objectives and actions into their local and regional plans as they update their General Plans and other policy documents in the future. Del Mar feels that participation in the process of identifying the criteria for success and in incorporating appropriate goals and policies of the RCP into future Community Plan updates are key elements to the success of the Plan.

As the smallest City in the region, Del Mar is also concerned about the criteria that will be used to judge the award of future funding for projects consistent with the RCP goals and policies. It may be that the standards set forth to assess the progress in various areas of the region will be tied to the criteria for receiving funding, but we feel this should be identified and discussed in the RCP or in an addendum document to some degree as soon as possible.
City of Del Mar  
Comments on Draft Program EIR for the RCP  
May 17, 2004  
Page 2

Essentially there should be some kind of recommendation in the RCP for appropriate “grading points” that would ensure equal opportunity for funding by every community, large or small, so that each community knows what to include in future project planning to be eligible for future project funding.

Del Mar feels that just as it is important for the RCP policies to identify preservation of open space areas outside the urban core, preservation of existing environmental resources within the urbanized areas of the County need to be identified as priority areas for preservation and restoration as well. Del Mar is very concerned about the preservation of the existing coastal resources like the San Dieguito and Penasquitos Lagoons, Crest Canyon, Torrey Pines Preserve and the beaches. The RCP appears to set forth policies that would protect these resources because they are of significant public importance. However, Del Mar recommends that the RCP more strongly identify criteria for development in the vicinity of these significant visual and environmental resources that will limit projects as needed to protect and restore environmental resources and views to and along these resources. Criteria for review should be strong enough to ensure that development would minimize the alteration of natural landforms; be visually and environmentally compatible with the character of surrounding areas and with the natural resources; definitely not further degrade these resources; and even be conditioned to restore and enhance the environmental and visual quality in some of these environmentally and visually degraded areas.

Another issue that has come up in the last several years in the region is the expansion of some of the region’s entertainment venues, such as Sea World and the San Diego Zoo. Often times preservation of our environmental resources seems to take a back seat to the “bigger” and “better” vision that the particular venue has for itself. Del Mar would like to see criteria laid out in the RCP that would limit additional development for all regional entertainment venues, require rehabilitation of resources where they have been degraded, and would not allow further degradation of those resources.

The goals of the RCP will be a challenge for the region to adhere to, but will enhance the quality of life in San Diego County if it is adopted and implemented in all jurisdictions. The City of Del Mar thanks you again for this opportunity to comment on the Draft Program EIR for the RCP.

Sincerely,

Richard Earnest  
Mayor

cc: Del Mar City Councilmembers  
Lauraine Brekke-Esparza, City Manager  
Carolina Gregor, RCP Project Manager  
Linda S. Niles, Planning Director
Letter H  City of Del Mar

H-1 This comment provides opening remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

H-2 The Revised Working Draft RCP dated May 24, 2004 includes performance indicators for each of the topic areas of the RCP, as developed by the Regional Planning Committee and its working groups. Additionally, SANDAG will release a baseline monitoring report this fall. Using the information in the baseline report, the Regional Planning Committee and its working groups will develop short and long-range targets that will serve as a benchmark by which to monitor and assess the region's progress on the policy objectives. The Implementation chapter of the Revised Working Draft also includes guidelines that serve as a tool for local jurisdictions to consider how they might incorporate the goals and policy objectives of the RCP into their own plans as local plans are updated.

H-3 The Regional Planning Committee and its Working Groups worked together to identify a range of smart growth categories and opportunity areas. The revised Urban Form chapter includes a matrix that outlines the specific desired characteristics of smart growth areas. The matrix reflects that smart growth is not a "one size fits all" endeavor, and attempts to create opportunities for all jurisdictions to participate. The Urban Form chapter also articulates principles for developing criteria for smart growth programs, and includes actions for developing and implementing the incentive programs. At this time, the plan does not call for linking progress on performance indicators to distribution of smart growth incentive funds because performance indicators are intended to focus on the region as a whole, not on individual jurisdictions or subregions.

H-4 SANDAG agrees, as stated, that just as it is important for RCP policies to preserve open space beyond urbanized areas, it is important to preserve existing environmental resources within the urbanized areas of the region. The Healthy Environment chapter sets forth policy objectives and actions to achieve both. At this time, however, neither the Healthy Environment chapter nor the Urban Form chapter identifies criteria for development in the vicinity of significant visual or environmental resources. This may be a topic for consideration in future updates to the RCP.

Mitigation measures that will be implemented to preserve coastal resources include:

Bio-1 Design development projects to minimize or eliminate impacts to natural habitats and known sensitive resources. Development within large contiguous areas of habitat shall be minimized to reduce fragmentation of remaining habitat areas.
Bio-6  Preserve open space areas identified in local, state and federal plans.

Bio-10 Site and design future projects to avoid significant impacts to marine resources. Any unavoidable impacts to significant marine resources will be mitigated to below a level of significance in accordance with the requirements of the local jurisdiction and appropriate agency (e.g., CDFG, USFWS, NMFS).

H-5  At this time, the RCP does not address issues related to the expansion of regional entertainment venues, including degradation of resources and rehabilitation of degraded resources. Individual environmental impact reports prepared for specific entertainment projects within local jurisdictions should identify and address significant impacts.

H-6  This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
April 15, 2004

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

Dear Mr. Rundle:

Thank you for the opportunity to comment on the draft Program Environmental Report for the Regional Comprehensive Plan for the San Diego Region. For future reference, please include not only Development Services and Water departments, but also the City of San Diego’s Environmental Services Department (ESD) on your distribution list. ESD addresses solid waste management and energy conservation, and the comments in this letter will focus on these issues, and also on the overall CEQA approach for the Regional Comprehensive Plan (Plan).

This EIR attributes many impacts to this Plan, but it should not. The Regional Comprehensive Plan is advisory, it “encourages” actions, but conformance with the plan is not a requirement and thus the Plan does not, in and of itself, create impacts. One way to avoid this problem would be to process the Plan under a negative declaration or an exemption.

The problem with attributing impacts to the Plan is that, just as the Plan is advisory and SANDAG cannot ensure that actions are taken in accordance with the Plan, similarly SANDAG, the lead agency, cannot ensure that mitigation measures described within the document are taken. As you know, mitigation measures with no assurance of implementation are invalid under case law. For example, one mitigation measure is for local governments to adopt land use plan amendments. This sort of unreliable mitigation measure has been repeatedly disallowed by the courts. While it is true that no one is likely to challenge the validity of this EIR, technically, to make this EIR defensible would force this EIR to call out significant unmitigated impacts in virtually every issue area, when in reality the Plan has no impacts at all.
The Plan has made it clear that the region has a shortage of both solid waste disposal and energy generation facilities. This is true, though because this Plan has no regulatory effect on development, it has no impact. However, if this Plan had a regulatory effect on development, then development under the Plan would have significant impacts. If this were the case, the impacts to energy generation and waste disposal capacity should be described on page 5.12-4. The disposal capacity should be contrasted with the waste generation rate, and on page 5.7-1 the energy generation capacity should be contrasted with the energy consumption rate. If it had regulatory authority, development under the Plan would then need to include energy conservation and waste reduction measures in order to avoid impacts. If an analysis is included, it should be correct; however, as previously explained, the analysis can be omitted completely.

If an analysis is included in this EIR, then it should be complete. Page 5.12-4 does not include a complete discussion of proposed disposal facilities in the region. Because the Campo Landfill is controversial, and because it is on a tribal reservation that is considered “not in the County,” this proposed facility was excluded from inclusion in the Siting Element. Under State law the Siting Element only had to consider facilities “in the County.” Under CEQA, however, when looking at capacity, the analysis should look at what disposal facilities may actually become available. The County’s reasons for excluding this facility from its State-mandated planning document are irrelevant. Campo should only be excluded if the CEQA analysis determines that the facility is unlikely to obtain approvals or if the region is unlikely to use the facility should it become permitted. The same is true for the Gregory Canyon Landfill. Again, this discussion could be deleted entirely, but if not, it should be made complete.

Page 5.12-4 is incorrect in its description of proposed facilities. The City of San Diego is not “considering expanding” the Sycamore Landfill. The Sycamore Landfill is a privately-operated facility. The operator has applied to the City for revised land use permits to significantly expand the size and throughput of the facility. This section should either be deleted entirely or else corrected.

Page 5.12-4 is misleading. This page explains regulatory restrictions on the rate of acceptance of trips and tons at existing facilities. These activities are regulated by the same permits that are required for new and expanded facilities; they do not belong in a different category from other modifications, such as changing the limits on landfill volume. Therefore the sentence “These limits are a matter of traffic control . . .” should be deleted.

Because the wrong type of CEQA document is being prepared, the discussion of solid waste management is confusing. A hodgepodge of mitigation measures are sprinkled throughout the document. Page 1-29 lists one mitigation measure: encouraging the use of recycled materials in future construction. This is an odd emphasis on only one of many measures. Page 3-21 is slightly more comprehensive than page 1-29, but equally confusing. This page discusses additional waste reduction measures, such as reduced product packaging. It is unclear from the discussion in the EIR who is going to take this “action.” Does SANDAG propose to take action to reduce product packaging? Page
5.12-7 says to “incentivize the redesign of packaging.” It also lists other actions but does not specify who should enact them. Wouldn’t the redesign of packaging come from the State level? Local legislative programs could passively support any such legislation that may be proposed by State legislators. Alternatively, local governments could more actively develop specific proposals and find sponsors, but such actions need to be evaluated by each jurisdiction in consideration of their program as a whole. Implementing fees are suggested on page 3-29. This is one possible measure to fund and achieve diversion, but the discussion in this EIR is vague and confusing. Would this measure be used to fund efforts to reduce packaging? To promote the use of recycled materials in future construction?

The cities and County have already specified what actions they will take. These actions are described in Source Reduction and Recycling Elements (SRREs) and are updated in annual reports. SRREs are approved by the California Integrated Waste Management Board (CIWMB) pursuant to State law. The CIWMB also ensures that SRREs are implemented. Failure to implement SRREs can result in fines of up to $10,000 per day. Thus SRREs are the meaningful plans with an enforcement mechanism. The discussion in the Plan and EIR of waste reduction measures could be deleted entirely, or, if it is included, it should refer to the appropriate planning documents, the SRREs. This EIR should not try to mitigate impacts that the Plan does not create. Attempting to mitigate such impacts puts this Plan and EIR in the position of having to select regional mitigation measures that the local governments in the region would then have to implement and that may run counter to efforts being conducted under State law requirements.

Returning to the point about this EIR calling out phantom impacts, comparison with the CEQA review for SRREs is appropriate. SRREs, in the County of San Diego, were approved by local governments and by the CIWMB under negative declarations or exemptions. This is an appropriate level of review since each program described in an SRRE is subject to its own discretionary review at the time of consideration. Inclusion of waste reduction proposals in the SRRE does not prejudice the ability of the decision maker to deny the project at the time it is proposed. When specific discretionary projects are proposed to reduce waste, they may or may not have been included in the SRRE. The annual report informs the CIWMB if adjustments to the program outlined in the SRRE were necessary. Similarly, the Plan that is the subject of this EIR is a flexible document that only encourages a particular approach to development. A negative declaration or exemption would be appropriate.

Pages 3-21 and 5.12-7 of this EIR are incorrect. The region’s Technical Advisory Committee (TAC) on compliance with the Integrated Waste Management Act rejected a specific goal of 75%. The SRREs do not include this goal, and such a goal was excluded from the County’s Summary Plan and Siting Element. The State requirement is a 50% reduction in the amount of waste disposed. Despite the implementation of numerous expensive programs since the Integrated Waste Management Act was first enacted in 1989, most jurisdictions have yet to meet this 50% waste reduction requirement. Therefore the TAC agreed to continue to “maximize” diversion, understanding that additional measures must be designed, considered, and implemented by each jurisdiction
according to its own processes. Therefore, the discussion on these pages should be corrected or deleted.

Thank you again for the opportunity to comment. In summary, the Plan and this FFR require several corrections. Additionally, many, if not all, of the impacts attributed to this Plan are not ripe for CEQA review since the actions have not been proposed by an agency with the authority to carry them out. Please call me at (838) 573-1236 if you have any questions.

Sincerely,

Lisa F. Wood
Senior Environmentalist
This comment provides introductory remarks and requests an addition to the noticing list for this project. The City of San Diego Environmental Services Department will be added to the list. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

SANDAG recognizes the advisory role it plays in the implementation of the RCP; however, pursuant to CEQA Guidelines Section 15004(b), the timing for CEQA compliance involves a balancing of competing factors. An EIR should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

Pursuant to Public Resources Code Section 21065, a project is defined as an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment and which is an activity directly undertaken by a public agency.

The type of CEQA document prepared for a project depends on the amount of evidence that the project may have a significant environmental impact. An EIR is necessary if there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment (CEQA Guidelines Section 15063(b)(1)); whereas, a negative declaration is the appropriate document if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment (CEQA Guidelines Section 15063(b)(2)). Finally a categorical exemption is appropriate if there is no possibility that the activity in question may have a significant effect on the environment (CEQA Guidelines Section 15061(b)(3)).

Since physical changes will occur if the RCP is implemented, and these changes could be significant if mitigation was not incorporated, an EIR is the proper CEQA document for the RCP. The EIR concluded that some impacts would be significant and unmitigated, some impacts would be significant and mitigated, while others would be less than significant. Please see Table 1.6-1 of the Final EIR for a summary of impacts and mitigation measures.

The Mitigation, Monitoring, and Reporting Program prepared for the project has identified responsible parties for implementation of the mitigation measures.

Implementation of the Proposed Project will have the indirect effect of providing additional housing to meet the project population increase in the region, thus resulting in an increase in the number of housing units compared to what is anticipated under the existing general plans. This will result in a direct increase in
the amount of solid waste generated, and, indirectly, result in the need for expanded landfill capacity.

Potential impacts to energy resources were discussed in Section 5.7 of the EIR. The analysis concluded that implementation of the RCP would have a less than significant impact on renewable energy resources, and a significant and unmitigated impact on non-renewable energy resources.

I-4 The EIR used the best available information at the time of preparation, and has been prepared to a level of detail that is proportional to the level of specificity available. If the Campo Landfill site has not been discussed by the County, it is not appropriate to speculate in the EIR as to why the County has not presented Campo as an option. It is presumed that the exclusion of the facility was based upon sufficient information to question feasibility of implementation. The EIR concluded that the RCP would have a significant impact on landfills, however, this impact could be reduced to below a level of significance. Please see Section 5.12 of the Final EIR.

I-5 The Final EIR has been revised to indicate the correct ownership of the Sycamore Landfill and clarify the application details on the proposed expansion. The revised text is provided below and appears on page 5.12-4 of the Final EIR.

The City of San Diego is considering expanding the Miramar Landfill. Specifically, the city is considering options regarding a “vertical expansion” of Miramar Landfill, which would otherwise be expected to close in 2011. Vertical expansion could extend the landfill’s operational life between three and ten years. Additionally, an application has been filed with the City to expand the Sycamore Landfill. The application proposes revisions to land use permits to expand the size and throughput of the facility.

I-6 The Final EIR has been revised to reflect the comment. Specifically, the phrase “these limits are a matter of traffic control and health and welfare protection, but they can be changed through the permit review process” has been deleted. The revised text is provided below and appears on page 5.12-4 of the Final EIR.

Future landfill capacity depends on the adequacy of the physical capacity and whether facilities will be able to accept waste at the region’s rate of disposal. Physical landfill capacity is defined as the remaining volumetric landfill capacity of existing landfills. Even though physical capacity may be sufficient, the rate at which materials enter the landfill is restricted by the following constraints: the amount of annual and/or daily traffic and by tonnage limits at disposal and transfer facilities. If the 2004 permitted limits on disposal rates are not changed, and without increased landfill space, diversion or exporting of waste, the region will likely run out of landfill disposal capacity by 2016 (SANDAG 2003a).
Page 3-21 of the Draft EIR summarizes the objectives and actions identified in the RCP with regard to waste management. Since these objectives and actions are part of the RCP, they are not considered mitigation measures to reduce impacts, but are, instead, self-mitigating aspects of the RCP. The implementation of these objectives and actions were considered in the EIR analysis, but are not mitigation measures.

Footnotes are included on page 3-21 of the Draft EIR identifying who will play a part in implementation. For the action related to waste generation and encouraging and incentivizing the redesign of packaging, federal/state agencies, cities/county, service providers will be involved.

The action discussed on page 3-29 of the Draft EIR related to the collection of solid waste collection fees states that a portion of the fees should be dedicated to the strategic plan that would be developed as an RCP action.

As noted in the response to comment I-3, implementation of the RCP will increase the demand for landfill capacity in a region that is facing a shortage of landfill capacity in the future. It is appropriate to identify all impacts of the Proposed Project, including those to solid waste services/landfill capacity.

With regard to the SRREs the expectation is that the actions identified in the SRREs will continue to be implemented pursuant to California state law. Implementation of the RCP will not preclude the implementation of the SRREs.

Please see response to comment I-2.

The 75% diversion rate is a policy objective of the RCP (see page 3-22 of the EIR). While SANDAG recognizes the 75% diversion rate has not been formally adopted by the TAC, SANDAG’s position is that the region needs to move towards that goal. Additionally, based upon SANDAG’s conversations with CIWMB, the 75% diversion rate is expected to become a future goal. No changes have been made to the Final EIR based upon this comment.

This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 12, 2004

Mr. Rob Rundle, Senior Regional Planner
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101-4231

Dear Mr. Rundle:

Subject: Comments on the Draft Program Environmental Impact Report (DPEIR; SCH #2004011141) for the Regional Comprehensive Plan (RCP)

We appreciate the opportunity to review and comment on the DPEIR for the RCP.

As you know, the City of San Diego adopted a smart growth strategy, the Strategic Framework Element, as an amendment to the City’s General Plan and Progress Guide (General Plan), in October of 2002. The adoption of this growth and development strategy, also known as the City of Villages, was accompanied by the certification of a Final Program Environmental Impact Report (EIR). This element and associated Action Plan began the comprehensive update of all elements of the General Plan.

We have reviewed the DPEIR with respect to our General Plan update efforts as well as our certified Final Program EIR. We offer the following comments for your consideration:

The Executive Summary of the DPEIR (page 1-7) characterizes the General Plan update efforts of the City of San Diego, as well as the ongoing efforts of the city of Chula Vista and the county, to implement smart growth as “piecemeal” when contrasted to the RCP. This “piecemeal” conclusion is not supported in the land use or alternatives analysis sections of the DPEIR. This general assessment needs to be augmented if not tempered with relevant facts such as the current and future population represented by the City of San Diego as well as the city of Chula Vista and the southwestern urbanized portions of the unincorporated areas. It should be acknowledged that the City of San Diego is the regional employment and cultural center. The RCP and the DPEIR do not state a major, expected or planned regional shift in the population and employment center away from the City of San Diego. The adoption of a smart growth strategy by the City of San Diego, the process began by the city of Chula Vista and the county to update their respective general plans, and the subsequent implementation with appropriate land uses by the local jurisdictions are necessary steps towards regional smart growth and should not be simply termed as “piecemeal.” In addition, the adoption of the Multiple Species Conservation Program (MSCP) for the study area served by the City’s Metropolitan Wastewater Department and the

Planning Department
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619.534.3800 • Fax: 619.534.2578
approved, adopted MSCP subarea plans by the cities of San Diego and Chula Vista and the county for the southwestern portion of the region are an important component of any regional planning, and the DPEIR should acknowledge this ongoing effort to implement a viable habitat preserve. This preserve can define the urban development limit.

The DPEIR contains a map (Figure 3.4-1: page 3-9) which shows the Smart Growth Opportunity Areas (SGOA). Generally, the map shows the urbanized western third of the county. However, the identified SGOA includes the Interstate 15 corridor north of the city of Escondido. This 18 mile section north of Deer Springs Road to the county line in the unincorporated area is mostly steep, and its few flatter areas have already been developed. The land, due to its topography, is designated for estate densities. To include this area as an SGOA stretches the definition of smart growth. We urge the definition of smart growth be held to a high standard. The benefit of encouraging housing development in this stretch meets only one proposed project objective—to capture some of the 93,000 housing units that are expected to be exported to adjoining counties or to Baja California. The development of this corridor with additional housing may visually impact the current corridor of steep slopes covered in avocado groves and rock outcroppings, and diminish the visual break from the suburban housing tracts in the city of Temecula with the aesthetic avocado highway in northern San Diego County. The DPEIR needs to augment the visual quality analysis (Section 5.3) to include a discussion of this potential significant effect. The DPEIR should add the adjoining community planning areas in the Interstate 15 corridor to the list of unincorporated communities in the land use section (Section 5.3; page 5.1-7), which currently do not have densities needed to fully realize development within the SGOA.

The DPEIR states, in the air quality section (Section 5.5; page 5.5-17), that the “future smart growth land use pattern” under the RCP would support a mixed-use development facilitating alternative modes such as walking or bicycling” and that “one of the main goals of the RCP is to increase urban density through the implementation of smart growth strategies” (page 5.5-18). In addition, the DPEIR (page 5.9-14) also refers to “intensify density in predominately urbanized areas, as opposed to rural areas.” We urge a more proactive role of the RCP in supporting increased urban densities, mixed-use development, and walking and bicycling. The proposed project description of the DPEIR does not clearly emphasize increased urban densities or mixed use development which are vital components of urban smart growth. The transportation analysis (Section 5.4) should discuss methods and incentives in promoting alternative transportation modes and creating more walkable and bicycle-friendly communities; the current section as written only lists them as an issue relevant to transportation.

The air quality section (Section 5.5) should be augmented to include the growing importance of the federal eight hour ozone standard as an indicator for clean air. The discussion should include historic trends and the air basin’s attainment status as determined by the U.S. Environmental Protection Agency. In addition, this section should include a discussion of bicycling as a longstanding Transportation Control Measure of the regional strategy to attain clean air.
The DPEIR (page 5.6-8) should be revised to state that a 100 percent increase or doubling of the traffic volumes is needed to make a noticeable 3dB increase in traffic noise; a 50 percent increase would result in a 1.8dB increase.

The DPEIR contains a map (Figure 5.10-1; page 5.10-3) which shows naturally vegetated areas within the county. This map is placed and referred to in the biological resources section along with discussion of Habitat Conservation Plans and Natural Community Conservation Planning within the region. To complete the discussion, an additional map showing the MSCP area and its Multi-Habitat Planning Area and the Multiple Habitat Conservation Plan Area and its proposed preserve should be added to the document. This map was requested by the State Department of Fish and Game in response to the Notice of Preparation, and it is vital in the discussion and understanding of a regional comprehensive plan. Regional habitat preserve planning should be weighed equally with regional land use and transportation planning in a comprehensive effort. The mapped, adopted planned preserves of the habitat conservation plans can determine the regional urban development limit and disclose any need for conservation plans and preserves in other vital areas of the region.

The DPEIR repeats on three pages (pages 5.10-10, 11, & 13) that by "focusing on compact, more environmentally sensitive development patterns, impacts to native habitat and wildlife, and habitat fragmentation and isolation within the San Diego region would generally be reduced." This statement should be further expanded to state that these adverse effects would be greatly reduced if future development were directed towards urban infill and redevelopment in jurisdictions with adopted conservation plans and preserves such as the City of San Diego.

The DPEIR contains a biological mitigation measure (Bio-4; page 5.10-15) to minimize impacts to vernal pools, estuaries, lagoons, and other regionally significant biotic resources. In consideration of the importance of diminished vernal pools in the region and the uniqueness of undeveloped estuaries and lagoons, the avoidance of any adverse effect to these regional resources should be the proposed, initial mitigation effort. The DPEIR should generally identify any vernal pool, estuary, or lagoon in private ownership and in danger of impact from development as well as those in jeopardy from public improvements.

The cultural resources section (Section 5.11) of DPEIR concentrates on archaeological resources and needs to be augmented with discussion of historical resources. For example, the City of San Diego through its Historic Resources Board, maintains a list of significant historical as well as archaeological resources. The DPEIR should, as a minimum, refer to regionally significant historical resources, those deemed eligible for state and/or national register.

The services and utilities section (Section 5.12; page 5.12-3) should be augmented to state that the City's Metropolitan Wastewater System treats the wastewater collected by the five county sanitation districts listed, as well as those from the surrounding cities including National City, Chula Vista, El Cajon, La Mesa, Lemon Grove, and Poway. This is pertinent to regional planning because the improvements to the Metro system lead to the establishment of the MSCP. The MSCP was a mitigation measure required by the state and federal wildlife agencies to offset
impacts to sensitive species and habitats by continuing growth accommodated by the improved sewer capacity.

We appreciate the opportunity to comment and would be happy to meet if you wish to discuss our comments. Please feel free to call me or John Kovac at (619) 235-3207 if you have any questions.

Sincerely,

S. Gail Goldberg, A.I.C.P.
Planning Director

SGG/JK/ah
This comment provides introductory remarks and provides details related to the City of San Diego’s City of Villages program. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

The statement regarding a “piecemeal” approach to the implementation of smart growth refers to the fact that existing smart growth planning is focused in the cities of San Diego and Chula Vista. The commenter is correct in stating that these are the core population centers in the County, however, the planning efforts in these two jurisdictions does not address the needs of the whole County. The RCP provides a comprehensive approach for the entire County, and will work with the existing smart growth planning efforts underway in the cities of San Diego and Chula Vista.

Figure 3.4-1 of the EIR reflects potential smart growth opportunity areas due to their proximity to existing or planned transportation networks. Also identified are communities in the unincorporated County that could support compact, efficient and environmentally-sensitive patterns of development.

The analysis to create the map was conducted at the regional level. Further detailed analysis will be undertaken to identify target areas for smart growth. This later analysis will take into consideration topographic and other environmental constraints, as noted by the commenter.

Pursuant to CEQA Guidelines Section 15146, the degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. Additionally, pursuant to Section 15145, if, after through investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impacts. Therefore, the visual resources analysis was conducted at a regional level.

The reference to the unincorporated communities that would be considered for smart growth has been revised to state that “additional portions of San Diego County being considered for more intensified land use include, but are not limited to, the unincorporated communities of Valley Center, Fallbrook, Ramona, Alpine, and Lakeside.” Please see page 5.1-17 of the Final EIR.

The RCP is a detailed and comprehensive document that proposes a wide variety of goals, objectives and actions. Table 3.5-1 of the EIR summarizes these goals, policies, objectives and actions. SANDAG understands that increased density within the identified SGOA is important not only to “fit in” the 46,000 additional units that were used as the basis for analysis in the RCP, but also to create vibrant,
walkable, and transit-oriented communities. Specific densities have not been identified at this time, since the ultimate location of these new developments/renovation projects within the SGOA has not been identified.

J-6 Section 5.4 identifies promoting alternative transportation modes and creating walkable and bicycle-friendly communities as transportation objectives detailed in the RCP. As noted in Table 3.5-1 of the EIR, these objectives will be achieved through the implementation actions. For these objectives, the associated goal is to ensure that appropriate transportation projects routinely accommodate or provide for pedestrian and bicycle access in their designs. Chapter 7 of the RCP document discusses in detail how the objectives will be implemented.

J-7 Section 5.5 of the EIR includes information regarding the San Diego Air Basin and the 8-hour ozone standards. Page 5.5-9 of the EIR states that there were days when the federal 8-hour standard was exceeded. Additionally, a discussion has been added to page 5.5-10 of the Final EIR detailing the phasing out of the 1-hour standard for stricter 8-hour standard. The new text is provided below:

The EPA is in the process of phasing out and replacing the 1-hour federal ozone standard with a more protective 8-hour standard (8pphm) to address the adverse health effects of prolonged exposure. The 1-hour standard will be revoked in 2005. Although the 8-hour standard was not established until 1997, past monitoring data shows that in 1990 the region would have exceeded the standard nearly 100 days, whereas in 2003, the standard was exceeded 6 days. An air quality plan is due to the EPA in 2007 demonstrating how the 8-hour standard will be attained throughout the region in 2009. (SDAPCD, 2004b).

J-8 The Final EIR has been revised to reflect the use of bicycles as a means of reducing air pollution. The revised text is provided below and appears on page 5.5-1 of the Final EIR.

SANDAG is responsible for developing a “Transportation Control Measures (TCM) Plan” to help achieve air quality objectives for the region. The plan provides actions to reduce air pollution such as increasing efficiency of the transportation system, motor vehicles, and encouraging bicycling and other forms of transportation. The APCD adopts the TCM Plan as part of the Regional Air Quality Strategy (RAQS). The RAQS is updated on a triennial basis and outlines measures for achieving state and national air quality standards.

J-9 The Final EIR has been revised to state that a 100% increase in traffic volumes would be required to increase noise by 3dB. The revised text is provided below and appears on page 5.6-8 of the Final EIR.
None of these factors are expected to make major differences in noise volumes in heavily-traveled corridors, since changes in vehicle traffic volumes of 100% are required to make a 3 dB difference in traffic noise. Therefore, transit would have a less than significant noise impact.

J-10 A figure depicting the generalized habitat planning areas within the County has been added. Please see Figure 5.10-2 of the Final EIR.

J-11 The Final EIR has been revised to reflect the commenter’s suggestion. The revised text is provided below, and appears on pages 5.10-12, 5.10-13 and 5.10-15 of the Final EIR.

By focusing on compact, more environmentally sensitive development patterns, impacts to native habitat and wildlife, and habitat fragmentation and isolation within the San Diego region would be reduced. These impacts will further be reduced if future developments were directed towards urban infill and redevelopment in jurisdictions with adopted conservation plans and preserves. However, future growth will still take place, and will, in some cases, require the conversion of undeveloped land with the resulting impacts to biological resources.

J-12 It is infeasible to call for total avoidance of vernal pools, estuaries, lagoons and other regionally significant biotic resources at this time. Potential future projects may be proposed that would impact vernal pools, estuaries, lagoons or other regionally significant biotic resources, however, it may be determined that those project have beneficial impacts that outweigh the impact to those resources. Any impact to these resources would require mitigation consistent with the existing federal, state, and when applicable, local regulations.

Regarding the request to include a map of vernal pools, estuaries and lagoons in private ownership that may be impacted by development and improvements, since the specific areas targeted for development within the SGOA have not been identified, there is not enough information for analysis. If the RCP is approved, further analysis will occur between SANDAG and the local jurisdiction to further refine the SGOAs. During this process, specific constraints, including the presence of vernal pools, estuaries, and lagoons will be considered.

J-13 Page 5.11-4 of the EIR includes a discussion of registered historic landmarks within the County of San Diego. Specifically, the following information was included:

Numerous registered historic landmarks are recorded within the San Diego County area. These include archaeological sites, standing structures, features (prehistoric or historic), and historic districts that have been identified as significant and that may be listed on the National Register of Historic Places, the California State Landmarks list, and County and City
of San Diego Historic Landmarks lists. Additional resource lists include historic inventories of buildings and structures for the cities of Carlsbad, Oceanside, Escondido, Valley Center, Encinitas, Lemon Grove, National City, Chula Vista, La Mesa, San Ysidro, and El Cajon, and City of San Diego communities that include Sherman Heights, Bayside, El Cortez area, the Core study area called Harbor View, Barrio Logan and Southeast San Diego, the Mission Hills/Presidio Hills areas, and portions of downtown San Diego streets (7th, 8th, 9th, 10th, 11th, 12th, G, K, E, Imperial, Broadway, and Island), Grant Hill, Little Italy, and Centre City.

The EIR concluded that impacts to historic resource would be significant and unmitigated, since some of the redevelopment that could occur within urban infill areas could impact historic resources.

J-14 The discussion of the City of San Diego’s Metropolitan Wastewater System has been revised in the Final EIR to reflect the geographic scope of the service provided. The revised text appears below and on page 5.12-3 and 5.12-4 of the Final EIR.

The remaining portions of unincorporated San Diego County are serviced by eight individual wastewater agencies. The incorporated areas of the county include thirteen wastewater agencies/districts, many of which are run by cities. This includes the City of San Diego’s Metropolitan Wastewater System, which treats the wastewater collected by five county sanitation districts, as well as the Cities of National City, Chula Vista, El Cajon, La Mesa, Lemon Grove, and Poway.

J-15 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
April 28, 2004

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

SUBJECT: Initial City of Solana Beach Comments on the Draft Program Environmental Impact Report for the Regional Comprehensive Plan for the San Diego Region Regarding Significant and Unmitigated Impacts

Dear Mr. Rundle:

It is our understanding that the San Diego Association of Governments (SANDAG), as lead agency, has prepared a Draft Program Environmental Impact Report (PEIR) for the Regional Comprehensive Plan (RCP) for the San Diego Region in accordance with the California Environmental Quality Act (CEQA). The RCP is a long-term planning framework for the entire San Diego region which includes the cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and the unincorporated areas within the County of San Diego. We have concerns as presented below that some communities may be expected to amend local policies to come into conformance with the RCP, a document that concludes significant and unmitigable population, housing and transportation/circulation impacts will occur if the RCP is implemented.

The Draft PEIR addresses issues at a program-level and does not identify impacts associated with specific projects. The Draft PEIR addresses impacts to the following issue areas: land use, population/housing/employment, visual resources, transportation/circulation, air quality, noise, energy, geology/paleontology, hydrology/water resources, biological resources, cultural resources, and public services/utility systems. The Draft PEIR identifies mitigation measures that would reduce impacts, however potentially significant impacts in the areas of land use, population/housing/employment, transportation/circulation, energy, biological resources, and cultural resources would remain.

We note that the Land Use Analysis of Section 5.1 states that implementation of the RCP could result in a significant conflict with the land use planning documents for several jurisdictions in the San Diego region. These documents include general plans and Local Coastal Programs.
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The Draft PEIR proposes as mitigation that local jurisdictions shall adopt land use plan amendments, including general plan amendments, local coastal program amendments and an amendment to the Port Master Plan to eliminate inconsistencies between future land uses and densities identified in these plans, compared to future land uses and densities identified in the RCP. Communities such as Solana Beach desire to carefully balance their personal, small town character with regional issues. Furthermore, some communities such as Solana Beach and Escondido have General Plan densities requiring a citizen vote to increase. Care should be taken to insure diversity and uniqueness of our individual communities is maintained in years to come.

Section 5.2 Population/Housing/Employment

The Draft PEIR states that “At the regional and local level, implementation of the RCP would result in significant population and housing impacts.”

The Draft PEIR furthermore states that “There are no feasible or practicable mitigation measures to reduce the significant impacts other than the adoption of the No Project/Existing General Plan Alternative or the Reduced Intensity Alternative. Each agency is legally mandated to accept a certain amount of housing and the associated population growth. Thus, it is not feasible from a legal standpoint to not accept that growth. From a regional perspective, population growth is generated from births and immigration. This increase in population can not be legally controlled by local government agencies.”

The Draft PEIR concludes that this is a significant and unmitigated impact.

Section 5.4 Transportation/Circulation

The Draft PEIR states that “Implementation of the RCP would have significant transportation and circulation impacts on and near localized roadways due to increased density. If development occurred in accordance with existing approved land use plans, it would likely result in significant adverse impacts to regional and local transportation systems. However, the impact might be less than the Proposed Project in some localized areas due to the lower planned density of development.”

The Draft PEIR concludes that while some mitigation measures are available, the impacts will be significant and unmitigated.

The City of Solana Beach strongly encourages SANDAG to identify realistic and successful mitigation techniques to reduce potentially significant impacts to a level of insignificance. Perhaps the establishment of regionally collected fees allocated to specific local areas with potential significant impacts resulting from the implementation of the RCP is one approach. Another might be assigning a higher funding priority for SANDAG-administered transportation and/or Smart Growth Funds.
We presently believe our existing and surrounding train station site is designed to meet the spirit and intent of the RCP without any significant amendments, if any, to our General Plan. We furthermore appreciate SANDAG staff efforts to date in our work toward recognizing the existing Solana Beach General Plan framework as potentially meeting the draft goals of the RCP. While Solana Beach supports the concept of Smart Growth, we desire to insure our quality of life is enhanced through the RCP process.

Sincerely,

[Signature]

Steven A. Apple
Director Community Development

cc. City Manager Barry Johnson
K-1 This comment provides introductory remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

K-2 SANDAG recognizes that land use patterns within some local jurisdictions already incorporate elements of smart growth. However, based upon a review of the existing land uses at a regional level, it appears that additional capacity may be available within a ¼ mile area around regional transit service corridors. Further analysis will occur to identify specific SGOAs. Once the SGOAs are identified, the case may be that the land use (residential) and the density proposed by the RCP may be inconsistent with the land use planning documents of local jurisdictions. If this is the case, then a general plan amendment would be required in order to remedy the inconsistency. If there are no inconsistencies between the uses and densities proposed by the RCP and the adopted land use planning document of a local jurisdiction, then no change would be required.

SANDAG recognizes that land use patterns within some local jurisdictions already incorporate elements of smart growth, and that communities within San Diego are unique. Additionally, the SANDAG recognizes that smart growth is not a one-size fits all proposition. The Urban Form chapter of the Revised Working Draft RCP (dated May 24, 2004) contains a matrix showing smart growth in seven distinct categories, and provides a regional framework for local land use decisions and plan amendments.

K-3 This comment summarizes the population, housing, and employment analysis of the EIR.

K-4 This comment summarizes the population, housing, and employment analysis of the transportation and circulation analysis in the EIR.

K-5 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

The RCP recognizes that smart growth development can require significant upfront investments in infrastructure. The RCP recognizes the need for transportation improvements in smart growth areas, and references strategies contained in the Congestion Management Program (toolbox) that can be applied
in those areas. Additionally, as part of the RCP, SANDAG proposes to establish an incentive program that will encourage implementation of the RCP goals and provide funding for infrastructure needs, particularly in areas that implement smart growth land uses. Transportation funds in the Regional Transportation Improvement Program (RTIP) will serve as the initial tool to assist in addressing traffic impacts associated with implementation of local smart growth policies.

K-6 Please see response to comment K-2.
May 10, 2004

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

RE: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (DPEIR) FOR THE REGIONAL COMPREHENSIVE PLAN (RCP) FOR THE SAN DIEGO REGION; INTERJURISDICTIONAL NOTICE (IJN 04-004)

Dear Mr. Rundle:

The County of San Diego has received and reviewed the DPEIR for the RCP for the San Diego Region, dated March 2004. As a member of SANDAG, the County has an active interest and role in the outcome of the RCP and its countywide application.

The County has fundamental concerns with the DPEIR including but not limited to:

- Overall implementation of the RCP as disclosed in the DPEIR and based on previous County comments;
- The DPEIR's inconsistency with Public Utilities Code (PUC), Division 12.7, Chapter 3, Section 132360.1;
- An insufficient project description that does not adequately identify a clear projected growth pattern or population distribution on a local level;
- A set of project objectives that appear to conflict with portions of the project description, impact analysis, proposed mitigation measures and the PUC (Section 132360.1);
- Inadequate use of program-level versus project-level mitigation measures;
- Insufficient evaluation of potentially significant environmental impacts, including cumulative analysis;
- Inadequate analysis of regional transportation and regional funding to non-smart growth opportunity areas (SGOA) of the unincorporated County;
- Inadequate analysis of regional water supply;
- Deficient reasoning for rejecting mitigation measures as infeasible.
The County requests that the DPEIR be revised and recirculated to address the following inadequacies in the DPEIR:

**General Comments**

1. The County continues to have concerns with the RCP and implementation of the plan, as indicated in previous County comment letters. All previous County comments conveyed to SANDAG still apply including those comments expressed in the County's RCP Comment Letter, dated February 25, 2004 and the County's NOP Comment Letter, dated March 3, 2004 (attached). The County continues to disagree on the content of "Actions" required in the RCP. The County objected to inclusion of certain actions in our earlier review of the RCP and the same actions remain, some of these actions include "create buffers between agriculture and urban development," "protect agricultural soils," "form a working group between SANDAG, County and tribal governments to assess transit and transportation," "establish a transborder environmental assessment process," "inclusionary housing," and "use of County generated TOT funds for beach sand replenishment".

In addition, the County Air Pollution Control District (APCD) reviewed the RCP and DPEIR and met separately with SANDAG staff. At this meeting, APCD highlighted several inconsistencies and inaccuracies in the RCP and EIR. All of APCD's comments should be addressed and the DPEIR should be revised based on APCD's comments.

2. Public Resources Code, Division 12.7, Chapter 3, Section 132360.1 outlines additional legislative intent of the RCP; purpose of the RCP; considerations for the RCP; coordination of general plans with the RCP and components of the RCP. 132360.1(b) states:

   If the consolidated agency prepares a regional comprehensive plan, it is the intent of the Legislature that:

   (b) In formulating and maintaining the regional comprehensive plan, the consolidated agency shall take account of and shall seek to harmonize the needs of the region as a whole, the plans of the county and cities within the region, and the plans and planning activities of organizations that affect or are concerned with planning and development within the region.

The County does not agree that regional comprehensive plan (RCP) has successfully harmonized the plans of the County with the RCP, or harmonized the planning activities of organizations that affect or are concerned with planning and development within the unincorporated portion of the County. The lack of
harmony is demonstrated through the changes County would have to undertake to implement this plan’s actions and the DPEIR’s mitigation measures. Many of these would involve legislative actions, policy changes, and additional County funding to implement.

3. The project description does not identify where the RCP’s future population and growth, including the additional 46,000 captured units, will be located on a local-level. Without identifying how the future population and growth will be distributed, including any captured units, the DPEIR analysis is unable to reasonably evaluate all of the RCP’s potentially significant environmental effects, including but not limited to, regional and local traffic circulation impacts, noise impacts, and air quality impacts. The DPEIR attempts to detail how the RCP will prioritize funding towards Smart Growth Opportunity Areas (SGOA); however, the DPEIR is unable to evaluate the impacts from the RCP, because there is no quantitative analysis that evaluates local impacts to major circulation element roads, local services (water and sewer), and other environmental resources (agriculture, biology, cultural resources, etc.). Moreover, the County has specific concerns with the analysis of regional transportation and water supply and specific comments on each of these issues are listed below.

An appropriate program-level analysis for the RCP should not only identify the projected and targeted future population for the region, but should identify how that future population and growth will be distributed throughout the County, city-by-city and in the unincorporated area community-by-community. This would allow for meaningful analysis to occur that could reasonably anticipate how the plan may potentially impact each jurisdiction. Without this analysis there is not adequate disclosure of potentially significant impacts. The absence of this material in the project description results in a less meaningful analysis that does not provide reasonable information for decision-making. Moreover, a deficient project analysis does not allow for a substantial or adequate cumulative analysis.

4. The DPEIR has several internal inconsistencies with the project objectives that appear to conflict with portions of the project description, impact analysis, proposed mitigation measures and the PUC (Section 132360.1). Specific examples are listed under the Specific Comments section below.

5. The DPEIR proposes mitigation measures that are better suited for a Project EIR, as opposed to a Program EIR. The advantage of using a Program EIR, "Allows the lead agency to consider broad policy alternatives and program-wide mitigation measures at a time when the agency has greater flexibility to deal with basic problems or cumulative impacts," (CEQA Guidelines 15168). However, as exhaustively listed under the Specific Comments section below many of the proposed mitigation measures are flawed because they are too specific for a Program EIR. The County recommends revising all the mitigation measures and
ensuring mitigation measures are relevant to mitigating the impacts of a regional plan. Furthermore, the DPEIR must propose feasible mitigation that is reasonably expected to be implemented. The current mitigation is infeasible because SANDAG does not have the authority to implement the mitigation measures.

6. As outlined in the DPEIR the RCP will have significant and unmitigated impacts to land use, regional and local population, regional and local housing, localized transportation/circulation, energy, biological resources and cultural resources. However, the DPEIR does not sufficiently discuss why these impacts cannot be mitigated to a level below significance. A comprehensive discussion should be added to the DPEIR that states why feasible mitigation is incapable "of being accomplished in a successful manner in a reasonable period of time, taking into account economic, environmental, legal, social and technological factors." (CEQA Guidelines 15364).

Specific Comments

The following comments address specific concerns the County has with the DPEIR.

7. Project Objectives and Proposed Project, pp. 1-2 to 1-3: As disclosed in the 2nd paragraph on p. 1-3, the intent of the RCP's allocation of regional transportation funding is inconsistent with the third project objective listed on p. 1-2. The project's third project objective intends to:

Support "smart growth" through the prioritization of regional transportation funds.

However, the discussion in the second paragraph on p. 1-3 does not discuss any prioritization of regional transportation funding. Instead the discussion outlines that regional transportation funding will only be targeted towards SGOA, if and when local governments designate development types, densities, and intensities that are consistent with the goals of the RCP. Specifically, this section states:

Designation of these opportunity areas is intended to provide guidance to local governments, property owners, and service providers as to where smart growth development should occur from a regional perspective, and focuses attention on these areas as local jurisdictions update their general plans and redevelopment plans. Once these are designated by local jurisdictions for development types, densities, and intensities consistent with the goals of this Plan, transportation facility improvements and other infrastructure will be targeted to these areas.
This approach appears to exclude regional transportation funding to non-SGOA portions of the unincorporated portion of the County. If this statement is not true the discussion should be revised to state how transportation funding would be allocated and prioritized to non-SGOA portions of the unincorporated County. However, if this statement is true and only SGOA portions of the unincorporated County (Valley Center, Fallbrook, Ramona, Alpine, and Lakeside) will receive transportation funding, the DPEIIR must evaluate how shortfalls in regional infrastructure will restrict growth within the unincorporated portion of the County and restrict the County from accommodating its portion of regional population growth.

The County is concerned that this approach would direct transportation facility and infrastructure improvements only towards SGOA portions of the County, creating disharmony with the County’s General Plan update (PUC Section 132360.1(b)). Valley Center, Fallbrook, Ramona, Alpine, and Lakeside are not the only areas that are planned for future growth in the County. The County’s continued regional growth is partly dependent upon regional transportation funding. If regional transportation funding will only be allocated to the SGOA, the EIR must analyze the inconsistency that may arise in the County’s General Plan if funding is not provided to non-SGOA portions of the unincorporated County, outside of Valley Center, Fallbrook, Ramona, Alpine, and Lakeside.

Public Resources Code, Division 12.7, Chapter 3, Section 132360.1 further outlines legislative intent of the RCP; purpose of the RCP; considerations for the RCP; coordination of general plans with the RCP and components of the RCP. 132360.1(b) states:

If the consolidated agency prepares a regional comprehensive plan, it is the intent of the Legislature that:

(b) In formulating and maintaining the regional comprehensive plan, the consolidated agency shall take account of and shall seek to harmonize the needs of the region as a whole, the plans of the county and cities within the region, and the plans and planning activities of organizations that affect or are concerned with planning and development within the region.

The County does not agree that regional comprehensive plan (RCP) seeks to harmonize the plans of the County with the RCP, or seek to harmonize the planning activities of organizations that affect or are concerned with planning and development within the unincorporated portion of the County. The issue outlined above is only one example of disharmony with County's plans. Several other examples are listed in subsequent comments.
8. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Table 1.6-1, pp. 1-15 and 1-32: Table 1.6-1 includes mitigation measures that cannot be implemented by the Lead Agency (SANDAG). Instead the Lead Agency intends for the member agencies to carry out these mitigation measures. However, many of these mitigation measures are appearing in this document for the first time, having never been discussed or agreed-to by the agency that would carry them out. Some the proposed mitigation measures should be deleted altogether because they are not practical proposals that support sustainable development and others should be rewritten as guidelines. As currently proposed, several mitigation measures restrict local jurisdictions from making any interpretation or determination on appropriate mitigation for future project-level impacts. Additionally, many of the mitigation measures require actions that have immediate costs. SANDAG should indicate the anticipated funding source for these actions and quantify the fiscal impact by agency.

9. Project Objectives and Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Table 1.6-1, pp. 1-2; 1-15 and 1-32: The 2nd project objective aims to, “Encourage sustainable development by making land use decisions and infrastructure investments that are good for the environment.” However, the project’s proposed mitigation measures are written in a manner that would severely restrict local agencies from executing professional judgment for mitigating project-level impacts. The County has extensive environmental resources that could be relied upon to make land use decisions that are good for the environment within the County’s jurisdiction. The County’s professional evaluation of appropriate mitigation measures for future project-level impacts should not be entirely dismissed. The following comments identify mitigation measures that the County would like to be revised.

10. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, LU-1, Table 1.6-1, p. 1-15: As outlined above, PUC, Section 132360.1(b) requires the RCP to harmonize with the County’s General Plan, not vice versa. It is inappropriate to utilize subsequent legislative actions by other agencies as mitigation. The County recommends LU-1 should not state that, “Local jurisdictions shall adopt land use plan amendments...” but “are encouraged to adopt land use plan amendments.”

11. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, LU-2, Table 1.6-1, p. 1-15: The County continues its objection to this measure. The statement that "local governments shall...provide buffers to reduce land uses that would affect the viability of continued agricultural activities" is unclear. By "provide buffers to reduce land uses," is SANDAG suggesting that the County purchase land to remain vacant between properties? Or is SANDAG suggesting that farmers be regulated in such a way that they cannot farm their
perimeters? In any case, the DPEIR unclearly discusses this issue and does not adequately analyze the impact this measure may have on local agriculture if agricultural operations are restricted. Agriculture is occurring in various locations throughout the unincorporated areas and in many cases on land with residential zoning designations. Due to the impracticality of this project-level measure in a County that supports small farms and residential uses, it should be eliminated entirely.

12. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, LU-3, Table 1.6-1, p. 1-16: The County disagrees with this mitigation measure. If the MRZ-2 land's deposits are no longer mineable, processable, and marketable it is unlikely that the resource would be exhausted. Therefore, this mitigation measure may result in lands that are no longer economical to mine, but cannot be converted to a non-mining use because the mineral deposits on these lands have not been exhausted. The County recommends revising this measure to acknowledge this condition and allow local jurisdictions to make their own determination as to the appropriate time to convert MRZ-2 lands to a non-mining use.

13. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, LU-4, Table 1.6-1, p. 1-16: Frequently, noise analyses propose a range of alternative mitigation measures that may reduce a potentially significant noise impacts. However, this mitigation measure states, “Any noise mitigation measures recommended in these analyses shall be implemented.” The County disagrees with this mitigation measure, because it limits the County’s discretion to choose from a range of any future project-level mitigation measures. This mitigation measure should be replaced with a program-level mitigation measure.

14. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, LU-5, Table 1.6-1, pp. 1-16 to 1-17: This mitigation measure states that “each agency is legally mandated to accept a certain amount of housing and the associated population growth.” However, the objective of the RCP is to increase the region’s total housing supply above the level mandated through housing element law. Therefore, the logic of this mitigation measure does not hold up and the discussion should be revised.

15. Also, adoption of a project alternative is not considered mitigation and this statement should be revised.

16. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Vis 1-5, Table 1.6-1, pp. 1-17 to 1-18: It is unclear whether these mitigation measures are intended to be guidelines for local jurisdictions or requirements.
17. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Vis 6, Table 1.6-1, p. 1-18: This mitigation measure seems to be broadly mandating the use of visual simulations for all future development projects in the coastal zone. This requirement will increase housing costs and may limit the extent of smart growth opportunities. Also, the measure represents an intrusion on local discretion. The County recommends this measure be replaced with a more suitable program-level measure.

18. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Vis 7, Table 1.6-1, p. 1-18: The EIR does not identify what the "best management practices manual" is, how it will be used, and who will be using it. The County would require that the manual be consistent the County's Light Pollution Code (Section 59.101-59.115). Also, the County would like to be consulted during the development of such manual and recommends the manual only provide guidance, not mandatory requirements.

19. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Air 1, Table 1.6-1, p. 1-19: Phasing is not the only way to deal with construction emissions. There are many Best Available Control Measures (BACMs) that are commonly applied to development projects that adequately mitigate impacts associated with construction emission. This mitigation measure would require mandatory phasing of all construction activities to reduce construction emissions. However, the measure does not discuss any proposed thresholds for how much grading or clearing could occur in each phase or outline the standards upon which this requirement is based. The County recommends replacing this measure with a broader programmatic measure that allows local jurisdictions to choose how to effectively reduce potentially significant construction emissions on future development projects.

20. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Noise 1, Table 1.6-1, p. 1-20: This mitigation measure states, "Site planning shall consider and avoid noise sensitive areas." The County defines noise sensitive in the General Plan, Noise Element as "any residence, hospital school, library or similar facility where quiet is an important attribute." Based on the County's definition of noise sensitive areas this mitigation measure will prohibit site planning for the uses that RCP is designed to encourage and this mitigation measure is not in harmony with the County's General Plan. This mitigation measure should be revised and indicate site planning should consider ways to avoid significant impacts to noise sensitive areas, but not avoid planning for these areas.

21. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Noise 2, Table 1.6-1, p. 1-20: The mitigation measure does not provide any examples of the types of transportation facilities or land uses that are
Incompatible and would require zoning designations. This information should be provided and the mitigation measure must be feasible and implementable.

22. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Noise 3, Table 1.6-1, p. 1-20: Due to the public safety concerns associated with train regulations. No regional limitation on train horns should be proposed as a part of the DPEIR.

23. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Noise 4, Table 1.6-1, p. 1-20: The County recommends revising this mitigation measure as follows: “Avoid noise and vibration impacts by the careful siting of facilities and the use of noise-reducing berms, walls, and other barriers as deemed appropriate by the local jurisdiction.”

24. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Paleo 1, Table 1.6-1, p. 1-23: This mitigation measure seems to be broadly mandating paleontological monitoring in all areas identified as moderate or high potential for paleontological resources as mapped by SanGIS. The County would like this measure to be clarified and only require monitoring if the local jurisdiction determines construction activities will significantly disturb the unweathered bedrock in areas identified as moderate or high potential to support paleontological resources. If the construction activities will not significantly disturb unweathered bedrock in these areas there is no chance that resources will be damaged and monitoring is senseless. If the measure is not changed this requirement will increase housing costs and may limit the extent of smart growth opportunities. Also, the measure represents an intrusion on local discretion.

25. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Water 2, Table 1.6-1, p. 1-23: The intent of this mitigation measure is unclear. Based on the County’s understanding, the measure may present a logistical problem because stormwater improvements do not always take place concurrently with project or other project impacts. Most physical stormwater improvements cannot be made until project grading is complete. To mitigate short-term stormwater impacts, construction BMPs are implemented. This measure should be revised to precisely state its intent.

26. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Water 3, Table 1.6-1, p. 1-23: This mitigation measure does not consider the hydrologic cycle in the unincorporated County’s alluvial basins, fractured rock aquifers or desert basins, or acknowledge the County’s current practice of managing groundwater resources. The impact analysis is dubious since the proposed project, if it includes the County's population targets, should have a lower impact on groundwater than the County’s existing general plan. The implementation measure that future developments be required to do
groundwater recharge programs is not the way the County manages groundwater resources. Instead, groundwater is managed through the application of densities and lot sizes that can maintain sustainable yields. A broad mandate to require groundwater recharge programs to maintain adequate ground table elevations is impractical and has not been discussed with the County's Groundwater Geologist. The County should be contacted for input on appropriate groundwater strategies. Otherwise, the County requests no such mitigation measure applies to the unincorporated portion of the County.

27. **Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Cult 1, Table 1.6-1, p. 1-27:** This measure states, "A literature review, record search, and field survey will be necessary to identify the presence or absence of cultural resources for each future development project." This broad mandate would result in hundreds of additional field surveys each year and would contribute to an increase in housing costs that in turn may discourage smart growth opportunities. The County recommends this measure be revised to only require record searches and field surveys to be completed as determined by the local jurisdiction. Otherwise, potentially hundreds of discretionary permits issued by the County would need to complete a literature review, record search and field survey.

28. **Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Cult 2, Table 1.6-1, p. 1-28:** It is unclear what the "minimization of significant archaeological and historical resources" means. Please clarify this mitigation measure.

29. **Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Cult 3, Table 1.6-1, p. 1-28:** It is unclear as to whether the curation of artifacts would apply to past, present, or future development projects. This measure should be revised to clarify that curation is for future development projects.

30. **Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Cult 4, Table 1.6-1, p. 1-28:** The County recommends revising this mitigation measure to require only the integration of significant historical resources into the design of future developments. Also, the EIR does not identify what the "Urban Design Best Practices Manual" is, how it will be used, and who will be using it. Again, this mitigation measure may be infeasible and not appropriate.

31. **Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, Cult 6, Table 1.6-1, p. 1-28:** The County's Resource Protection Ordinance (RPO) requires full preservation of significant historic structures and buildings that can provide information regarding important scientific research
questions about historic activities that have scientific, religious, or other ethnic value of local, regional, State, or Federal importance, and does not allow for their demolition. This mitigation measure should be deleted or revised to prevent inconsistencies with the County’s RPO and promote harmony.

32. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, ServSys 2, Table 1.6-1, p. 1-29: Many low-flow devices are already required under State law, and to that extent, this mitigation measure does not accomplish more. To the extent that it is proposing requirements in excess of State law, such as a broad xeriscaping requirement, this could be a significant policy debate on the extent to which the County would want to limit consumer choices and regulate the development industry. It is not reasonable to put significant policy choices for other jurisdictions into mitigation measures.

33. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, ServSys 3, Table 1.6-1, p. 1-29: This mitigation measure represents deferral of analysis of a regional issue (water supply) that is necessary to discuss in this DPEIR. Without this discussion the DPEIR is flawed and inconsistent with the requirements of CEQA. Moreover the deferral of this issue forces future, individual development projects to solve a regional issue in a piecemeal fashion. This is inappropriate and the DPEIR should be revised to address this fundamental concern.

34. Plan Concept, p. 3-7: The second paragraph states:

...as well as other locations where compact development is appropriate from a regional transportation/land use perspective. These other locations include unincorporated communities such as Valley Center, Fallbrook, Ramona, Alpine and Lakeside.

Compact development in the County may not be considered “compact” when compared with development patterns in incorporated cities. The County recommends rephrasing these sentences to read “...as well as other locations in the County. These other locations may include, but are not limited to unincorporated communities such as Valley Center, Fallbrook, Ramona, Alpine and Lakeside.”

35. Intended Uses of the PEIR, p. 3-15: This page presents a major concept, that SANDAG, regional agencies and districts, “will review subsequent implementation projects for consistency with the PEIR.” This indicates that the County will review GPAs, rezones, Specific Plans, and permits, among other projects, for consistency with this document. The context for this review occurring is unclear since the land use changes are not processed by any of those regional entities. The discussion goes on to say that the County and cities
“may” use the DPEIR for implementation activities. It must be noted that this DPEIR is not binding on cities or the County.

36. RCP Goals, Policy Objectives, Actions, and Implementing Parties, Table 3.51, p. 3-27: Under Integrated Regional Infrastructure Strategy (IRIS) Policy Objective 2 states:

Directly link transportation and other infrastructure capital improvement programming to land use decisions that support the urban form and design goals envisioned in the RCP.

There will be high priority transportation and infrastructure programming needs that will fall outside of the urban form and design goals as envisioned by the RCP. Regional transportation needs often don’t relate to the land use patterns of a particular community. For example, Highway 125 primarily serves commuters traveling through the community of Sweetwater. The County recommends deleting this policy objective.

37. Land Use, Existing Conditions, Unincorporated Areas, p. 5.1-6 states:

The San Diego County region contains substantial unincorporated areas. The Unincorporated county towns of Fallbrook, Valley Center, Ramona, Bonita, Spring Valley, Casa De Oro, Julian, Alpine, Pine Valley, Descanso, and Borrego are located in the more rural areas consisting of a community core surrounded by an expanse of predominately undeveloped land.

This paragraph (and the communities listed) is not an accurate depiction of the County’s existing land use conditions. The County recommends deleting and rewriting the paragraph to read:

San Diego County has identified 23 community and sub-regional areas throughout the unincorporated county. Unincorporated communities adjacent to incorporated cities tend to have more urbanized land use patterns. Other San Diego County communities typically have an identifiable community core surrounded by more rural land use patterns. The unincorporated portion of the County has a population of approximately 446,000, a housing stock of approximately 153,000 units, and has approximately 106,000 jobs.

38. Land Use, Existing Conditions, County General Plan Update, p. 5.1-10 should be deleted and re-written to read:

General Plan 2020 (GP2020) is a comprehensive update of the San Diego County General Plan, establishing future growth and development patterns for
the unincorporated areas of the County. It will identify the potential size and
distribution of the County’s future population – balancing housing, employment
and infrastructure needs with resource protection. Compared to the existing
General Plan, this update will focus population growth in the western areas of the
County where infrastructure and services are more readily available.

General Plan 2020 distributes 80% of the future population to unincorporated
communities inside the County Water Authority (CWA) Boundary. The plan also
reduces low-density development and increases medium to high-density
development in North and East San Diego County communities. The plan
proposes increased housing densities within the village limit line of various rural
communities but has reduced development densities in outlying backcountry
areas.

39. Population/Housing/Employment, Significance Criteria, Local, p. 5.2-2: There is
no justification why, “An increase of population, residential density, or
employment of 10 percent locally,” represents a potentially significant impact.
Further justification should be provided.

40. Air Quality, Significance Criteria and Impact Analysis, pp. 5.5-16 to 5.5-19: The
air quality significance criteria and analysis omit significance criteria and analysis
for several air quality issues including but not limited to: cumulatively
considerable net increases of any criteria pollutant for which the project region is
in under the applicable Federal or State ambient air standard including ozone;
and projected air quality violations. This analysis should be completed.

41. Noise, Significance Criteria and Impact Analysis, pp. 5.6-6 to 5.6-10: There is no
impact analysis that evaluates whether the 2nd significance criterion is exceeded.
This analysis must be completed to ensure the RCP is consistent with County
standards.

42. Noise, Impact Analysis, pp. 5.6-7: The County disagrees with the following
statement in the second paragraph: “Each project would require its own noise
study as part of the environmental and review process.” The County does not
require noise studies to be completed for each discretionary project and this is
not warranted, unless there is reason to believe that a discretionary project would
create significant noise impacts.

43. Biological Resources, Impact Analysis, pp. 5.10-10 to 5.10-14: There is no
analysis of the RCP’s potential impact on the County’s MSCP.

44. Public Services/Utility Systems, Methods of Analysis, p. 5.12-6: The DPEIR
does not present any method of analysis that could be used to reasonably
forecast the range and extent of potentially significant impacts to public services.
The County is particularly concerned with the omission of methodology and analysis for water supply, considering the proposed project plans on capturing an additional 46,000 housing units without any analysis of these additional units' impacts on the imported water supply. The basic methodological assumptions should be clarified and the following questions answered. Were the CWA populations presented in the Regional Water Facilities Master Plan based on the cities' and County's existing general plans or SANDAG's population forecasts, which use different assumptions? Also, the DPEIR states that a qualitative approach was deemed appropriate to evaluate impacts to sewer/water systems, police/fire protection, parks and recreation and libraries; however, the DPEIR does not indicate the nature of this qualitative analysis. The County recommends that these deficiencies be corrected.

45. Public Services/Utility Systems, Significance Criteria and Impact Analysis, pp. 5.12-8 to 5.12-9: As mentioned above, the County is concerned with the DPEIR's insufficient analysis of water supply. The DPEIR states, Implementation of the RCP would result in a population increase in YEAR 2030 of 131,600 higher than the number anticipated under the existing general plans. This represents an approximate 3 percent increase. SDCWA's Regional Water Facilities Master Plan indicates that there is adequate water supply to serve the region until 2030; however, this forecast was based upon population numbers that did not take into account the addition of housing units under the RCP. This represents a significant water supply impact.

CEQA Guidelines Section 15144 states, "Drafting an EIR or preparing a negative declaration necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." On the issue of water supply the DPEIR fails to "use its best efforts to find out and disclose all that it reasonably can." There is no evidence in the DPEIR that demonstrates SANDAG has worked with SDCWA to obtain and disclose projected deficits in regional or local water supply that may occur as a result of exceeding the water demand that SDCWA's Regional Water Facilities Master Plan indicates it can reasonably provide. The DPEIR should not only acknowledge that there may be a potentially significant shortfall in water supply, but should make a reasonable projection of the anticipated shortfall that will occur as a result of the project and discuss how that may limit future growth in the region in quantitative terms.

46. Public Services/Utility Systems, Recreation, Impact Analysis, p. 5.12-13: The impact analysis of the RCP acknowledges that the plan will significantly impact recreation facilities and parklands. The RCP proposes to increase population in urbanized areas where recreation facilities and parklands may be in deficit, but
the DPEIR does not propose any form of feasible mitigation to assist the local agencies mitigate these impacts or justification for why mitigation measures are infeasible.

47. Public Services/Utility Systems, Summary of Impacts With Significance Conclusions, pp. 5.12-14 to 5.12-15: There is no concluding discussion on water supply.

48. No Project/Existing Plans Alternative, Land Use, p. 6-7 and SGOA – Increased Intensity Alternative, Land Use, p. 6-20: Under the proposed project agricultural resources and mineral resource zones are discussed under land use; however, these two alternative analyses entirely omit any analysis of agricultural resources and mineral resource zones. Additional discussion should be added to address agricultural resources and mineral resource zones.

49. SGOA – Reduced Intensity Alternative, Land Use, p. 6-14: Under the proposed project the mineral resource zones are discussed under land use; however, this alternative analysis entirely omits any analysis of mineral resource zones. Additional discussion should be added to address mineral resource zones.

50. SGOA – Increased Intensity Alternative, Land Use, p. 6-27: This alternative will further increase demand on water supply and as previously indicated the DPEIR should make a reasonable effort to disclose the shortfalls in supply that may occur, if this alternative is approved.

51. Alternatives, pp. 6-1 to 6-37: There is no comprehensive discussion that outlines whether the mitigation measures will apply to any of the alternatives and whether the alternatives mitigation measures will differ from those listed for the proposed project.

52. Cumulative Impacts, Noise, p. 7-8: In the second paragraph, noise vibration impacts are discussed as related to construction; however, there is no discussion related to operational impacts from mass transit or transportation facilities.

53. Cumulative Impacts, Geology/Paleontology, p. 7-9: As previously mentioned, the County disagrees that paleontological resources will be impacted by every future development within zones of moderate of high paleontological sensitivity. The County believes these resources would only be potentially impacted if the construction activities will significantly disturb the unweathered bedrock in these areas. Otherwise, this requirement will increase housing costs and may limit the extent of smart growth opportunities. This project level mitigation should be replaced with program-level mitigation.
54. Cumulative Impacts, Hydrology/Water Resources, p. 7-9: The DPEIR states, "All future developments are required to conform to all applicable regional, state, and federal water quality standards and waste discharge requirements. Therefore, cumulative impacts regarding waste discharge are considered to be less than significant." However, the State (RWQCB) issues permits for direct discharges and this may in fact result in future environmental impacts to water quality that has not been disclosed in the DPEIR.

55. Cumulative Impacts, Public Services/Utility Systems, p. 7-12: This discussion has an inadequate cumulative discussion and analysis on the impact of increased demand on water supply. The extent of the cumulative analysis includes the following statement, "Future development will require increased water supplies and water transportation facilities." This is not adequate cumulative analysis and the County requests that a cumulative analysis of water supply be completed.

Transportation/Traffic Comments

56. Summary of Environmental Impacts, Mitigation Measures, and Significance Conclusion, LU-1, Table 1.6-1, p. 1-15: As mentioned in Comment 10, LU-1 states "local jurisdictions shall adopt land use plans, amendments, including general plan amendments...to eliminate inconsistencies between future land uses and densities between the jurisdiction's plans and the RCP. This is not consistent with the objectives of the plan, which are to encourage sustainable development and the smart growth not to mandate it.

57. Proposed Project, p. 1.3: The DPEIR has a project objective to "support 'smart growth' through the prioritization of regional transportation funds." Many regional transportation needs exist in the San Diego Region and are considered in the allocation of regional transportation monies. Sole prioritization or heavily weighted prioritization toward smart growth would not enable the regional to address key regional transportation needs some of which may change over time. Establishing transportation funding priorities in the RCP is not appropriate and would not comply with objective #4 "Achieve fairness and equity in regional planning and development processes.

58. Smart Growth Opportunity Areas, Figure 3.4.1, p. 3-9: The figure provides a general map showing potential smart growth opportunity areas, but does not provide sufficient detail to identify where in the region the additional 46,000 housing units targeted by the RCP would be located. The assumptions made in preparing traffic forecasts to assess the traffic impacts associated the additional 46,000 units should be identified.
59. The criteria for each jurisdiction's compliance with the RCP are not specified or defined. For instance, how many of the 46,000 additional units will each jurisdiction have to accept? How will this affect each jurisdiction's general plan. Which jurisdictions would need to modify their general plans to accommodate the additional units? An assessment of general plan conformity for each jurisdiction should be provided.

60. The traffic assessment provides a general assessment/comparison of traffic volumes on regional freeways and highways. Traffic volume comparisons and impacts assessments on key regionally significant arterials; however, is not provided. An assessment of the potential impacts on regionally significant arterials should be provided.

61. Impact Analysis, p. 5.4-17: The DPEIR states that the RCP would generate traffic on local roadways and create localized congestion that may reduce Level of Service (LOS) to LOS E or F and in some cases require improvements beyond the maximum build-out identified on the jurisdictions general plans. Although these are identified as significant traffic impacts the mitigation measure, even at a program level is not sufficient to mitigate the traffic impacts. The mitigation measure states that future development projects will be required to address impacts as part of their environmental review process. Feasible mitigation measures to mitigate the traffic generated by the additional projects may not exist. This would particularly be true in infill areas and in the unincorporated country towns where existing development and community character would preclude the widening of roads in these areas.

62. Comparison of Impacts by Alternative, Table 1.7-1, p. 1-11: This table ranks and compares the impacts of each RCP alternative. The DPEIR should describe how the rankings were derived and how the magnitude of the impacts were determined.

63. The County's March 3, 2004 letter (attached) included several comments regarding the need for additional transportation and circulation assessments as part of the RCP DPEIR. The DPEIR states (pp. 2-2 and 2-6) that the RCP is a planning document and only program-level and qualitative evaluations are provided in the DPEIR. Adoption of the RCP will implement policies that will greatly impact land use and transportation development for the entire region. SANDAG, the RCP, and the DPEIR should make additional efforts to address all of the County’s transportation and circulation comments prior to the formal adoption and implementation of the RCP.

64. Summary of NOP Comments, Table 2.3-1, Note 2, p. 2-6: This note states that future development projects will identify site-specific impacts from implementation of the RCP. Region-wide assessments of the potential impacts...
of the RCP should be performed in addition to the site/project-specific assessment in order to better evaluate the affects of the RCP on the entire region. The cumulative impacts of the RCP may not as apparent in a site/project-specific assessment.

65. Regional Land Use, p. 4-2: The DPEIR states that there are 18 Indian reservations in the region; more than any other county in the nation. The DPEIR should also note that all 18 tribal reservations are located within or adjacent to the unincorporated area and served are by County roads and rural highways.

66. Existing Peak Hour Regional Freeway LOS, Table 5.4-1, p. 5.4-2: This table should be expanded to show highways in the unincorporated areas that currently operate at an inadequate LOS.

67. Method of Analysis, Transportation, p. 5.4-11: The 2nd bullet on p. 5.4-11 should be revised to state the following: Reduce traffic congestion on freeways, highways, and arterials.

68. Impact Analysis, p. 5.4-12 and Table 5.4-2 on p. 5.4-15: These parts of the DPEIR should include LOS assessments of Caltrans facilities located within the unincorporated area.

69. Impact Analysis, pp. 5.4-12 to 5.4-18 and Table 5.4-2 on p. 5.4-15: These parts of the DPEIR should also address travel times from unincorporated communities to other areas within the San Diego region.

70. Impact Analysis, pp. 5.4-17: The DPEIR states that implementation of the RCP would result in significant impacts to the capacity of the local street system and that the impacts may require expanding roadways and intersections beyond their maximum buildout in local circulation plans. SANDAG should perform further analysis to better identify which local street/Circulation Element roads may be required to upgrade their classification in order to offset the impacts of the RCP.

71. New Town Alternative, p. 6-4: The DPEIR acknowledges infrastructure deficiencies associated with freeways and highways that primarily serve the unincorporated communities. It should be noted that the freeways and highways that serve the unincorporated communities will require capacity and operational road improvements regardless of which RCP alternative is adopted.
Thank you for the opportunity to comment on the DPEIR. When copies of any revised or final environmental documents, including the PEIR, CEQA Findings (CEQA 15091), Findings of Overriding Considerations (CEQA) 15093 and the Notice of Determination are available for review the Department of Planning and Land Use formally requests copies of these documents be sent to 5201 Ruffin Road, Suite B, San Diego, CA 92123-1666. If you have any questions on these comments please contact Joan Vokac at (858) 694-3765.

Sincerely,

GARY L. BRYOR, Director
Department of Planning and Land Use

cc: Doug Isbell, Deputy Director, DPW, M.S O332
Bob Christopher, Land Development, DPW, M.S. O336
Bob Goralka, Route Locations, DPW, M.S. O385
Nelson Olivas, Environmental Services Unit, DPW, M.S. O385
Dawn Nielsen, Deputy Agricultural Commissioner, AWM, M.S. O1
Sharon Cooney, Policy Advisor, Board of Supervisors, M.S. A-500
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Cathy Martinez, CAO Staff Officer, M.S. A-6
Jason Giffen, Land Use/Environmental Planner, DPLU, M.S. O650

Reference: County Project IJN 04-004
This comment provides opening remarks and a summary of comments that are further detailed later in the comment letter. See responses L-2 through L-63 below.

SANDAG received the County's comments on the RCP and made changes to the draft RCP, reflected in the Revised Working Draft RCP dated May 24, 2004.

SANDAG removed the concept of protecting agricultural soils and shifted the content of that action toward protecting agricultural lands not only for future crop production but also to serve as food sources for wild animals and buffers between native habitats and urban development. Additionally, SANDAG has removed the concept of buffers between agriculture and urban development in the final RCP.

SANDAG also revised the action regarding the formation of a working group between SANDAG, the County, and tribal governments to assess transit and transportation needs, and rewording the action to reflect enhanced communications versus the formation of a working group.

SANDAG also revised the language in the Borders chapter regarding the establishment of a transborder environmental assessment process, emphasizing the development of a collaborative process versus the establishment of a formal environmental assessment process.

The action regarding inclusionary housing is optional, not mandatory, as called for in the County's February 27, 2004 comment letter. The action in the RCP does not focus solely on inclusionary housing. Instead, it provides a general menu of programs and incentives that jurisdictions can develop to encourage affordable housing, including but not limited to inclusionary housing, density bonus, second dwelling unit, and priority permit processing programs.

Finally, SANDAG did not remove the potential revenue source of TOT for beach sand replenishment because each affected jurisdiction would have to make those decisions individually. If TOT revenue is increased to meet additional needs, each jurisdiction will have to prioritize how those funds are spent.

SANDAG has worked with APCD to address issues of concern regarding the RCP; however, no specific comments were submitted by APCD on the Draft EIR.

SANDAG is working diligently with all of the affected agencies to harmonize the needs of the region as a whole. To implement the RCP it has been acknowledged that subsequent changes may be necessary in local land use planning documents. Since the release of the draft RCP, SANDAG has been working with the County to refine portions of the RCP, particularly segments of the Urban Form chapter. In
the Revised Working Draft dated May 24, 2004, the Urban Form chapter references and supports the County's General Plan 2020 update effort, especially with regard to the role of rural villages in providing a focal point for commercial and civic uses that can serve surrounding rural areas, and relieving pressure for development in outlying areas.

L-5 The EIR is a program level document, and analyzes the impacts of the Proposed Project proportionate to the level of specificity available. At this time, the identification of potential Smart Growth Opportunity Areas (SGOA) has focused on a regional-level analysis. Upon approval of the RCP, additional analysis will be done to refine the locations of the SGOA to take into consideration localized conditions, environmental constraints, and other factors.

This comment also raises concern about the analysis of regional traffic and water supply in the EIR. These concerns are presented in greater details in comments L-46 through L-48, L-62 and L-63. Please see responses L-46 through L-48, L-62 and L-63.

L-6 This comment states that there are internal inconsistencies in the EIR. The inconsistencies are presented in greater detail in comments L-9 and L-12. Please see responses L-9 and L-12.

L-7 This comment introduces concerns with the specificity of many of the mitigation measures proposed in the EIR. These specific comments are detailed in responses L-12 through L-35. In many of the comments, the commenter states that the language in the mitigation measures is too restrictive. SANDAG has the responsibility to identify feasible mitigation measures, as discussed below. If local jurisdictions choose implement any of the policies or actions in the RCP, then they would be encouraged to use the mitigation measures contained in the EIR as guidance to mitigate significant impacts. If the local jurisdictions do not want to use the RCP EIR as a basis for future environmental review, then they do not have to implemented the mitigation measures. That jurisdiction would need to conduct appropriate CEQA review, identify any significant impacts, and propose mitigation measures.

State CEQA Guidelines Section 15126.4 requires that an EIR identify feasible measures which could minimize significant adverse impacts. Additionally, pursuant to Section 15091, a lead agency may make findings that changes or alternations in the project are within the responsibility and jurisdiction of another agency making the findings, and that such changes can and should be adopted by such other agency.

L-8 Significant and unmitigated impacts were identified for the Proposed Project. For some of the unmitigated impacts (land use, transportation/circulation, biological resources, and cultural resources) mitigation measures are proposed to reduce the significant impact, however, the mitigation measures will not reduce the impacts
to below a level of significance. For the significant and unmitigated impacts to population/housing/employment, and energy resources, there are no feasible mitigation measures. Each unmitigated impact was evaluated for feasibility. Relevant discussions from the EIR are provided below:

As noted on page 5.1-23 of the EIR: Future development will result in significant impacts from conversion of undisturbed vacant land, agricultural land, open space and other natural resources to urban uses from a plan-to-ground perspective. Implementation of mitigation measure LU-2 would mitigate some of the impacts associated with the loss of agricultural lands. However, the impacts to agricultural lands would not be reduced to below a level of significance, since some loss of agricultural lands would still occur.

As noted on page 5.2-6 of the EIR: There are no feasible or practicable mitigation measures to reduce the significant population and housing impacts other than adoption of the No Project/Existing Plans Alternative or the Reduced Intensity Alternative. The physical effects of population and housing result in physical changes to transportation/circulation, air quality, noise, biological resources, cultural resources, energy, and public service/utility system impacts. The physical changes and mitigation measures for those indirect impacts are addressed in the applicable mitigation sections.

As noted on page 5.4-22 of the EIR: Implementation of the RCP would have significant transportation and circulation impacts on regional transportation systems and local streets due to increased density which are only partially mitigated by Trans-1. Some localized circulation networks will not be able to be improved to less than significant levels because of engineering constraints or limitations set forth in the local circulation networks.

As noted on page 5.7-9 of the EIR: The RCP has already included specific goals and objectives that reduce the consumption of non-renewable energy. These include increased reliance on mass transit, reduce average VMT, energy efficiency, promote renewable sources of energy and encourage energy efficiency. However, implementation of these goals and objectives will still result in a significant and unmitigated impact to non-renewable energy resources. Additional measures beyond those identified in the RCP are infeasible.

As noted on page 5.10-19: The RCP would likely result in a reduction of the number of rare or endangered plants and animals; thus, these impacts are significant and unmitigated. Site avoidance of all impacts to rare or endangered species can not be achieved at a regional plan level. Because San Diego supports such a diversity of these resources, it is unavoidable
that individuals of some species would be lost as a result of providing housing and associated infrastructure.

As noted on page 5.11-12 of the EIR: Due to the scale of the Proposed Project, and the long history of Native American habitations in the region, future grading and construction activities associated with implementation of the RCP are expected to result in significant impacts to archaeological and historical resources along the identified SGOA. Implementation of mitigation measures Cult-1 through Cult-6 would reduce some of these impacts to below a level of significance. However, some historical resources could be destroyed during implementation of the RCP. The loss of these historical resources cannot be reduced to below a level of significance.

L-9 One of the policy objectives of the RCP is to provide priority to transportation investments in smart growth opportunity areas while recognizing needs elsewhere in the region. Future transportation funding will be targeted, in part, in areas that reflect the goals of the RCP. The Transportation Priorities and Smart Growth section of RCP Chapter 4B describes the principles for updating the transportation project evaluation criteria used to decide how major highway, transit, and regional arterial system projects are prioritized. These principles address both smart growth land use considerations as well as the regional transportation needs, such as connectivity and efficient system operations.

Chapter 7, Integrated Regional Infrastructure Strategy (IRIS) of the RCP document identifies strategies for linking transportation and land use. This will be accomplished by establishing an incentive based process that links transportation funding to land use. It should be noted that only some funds will be targeted to these SGOAs. Other funds will be distributed to fund the RTP program of projects as well as local street and road funds which are spent at the discretion of each local agency.

L-10 As noted in this comment, SANDAG does not have legal authority to implement many of the proposed mitigation measures; however, SANDAG is responsible for proposing feasible mitigation measures. As noted in response to comment L-7, State CEQA Guidelines Section 15126.4 requires that an EIR identify feasible measures which could minimize significant adverse impacts.

This comment also requests the identification of funding sources and the quantification of fiscal impact. Fiscal analysis is not required to be included in an EIR. The purpose of an EIR is to address the environmental changes associated with a proposed project.

L-11 This comment provides an introduction to the subsequent requested language changes for the mitigation measures. It is not SANDAG’s intention to take land use decisions away from lead agencies. The specific comments regarding the
changes are presented in L-12 through L-35. Please see the appropriate responses below.

L-12 Please see response to comment L-7 for a discussion of SANDAG’s responsibility in identifying feasible mitigation measures that may be the responsibility of other jurisdictions.

Once the specific SGOAs are identified, the case may be that the land use (residential) and the proposed densities may be inconsistent with the land use planning documents of local jurisdictions. If this is the case, then a general plan amendment would be required in order to remedy the inconsistency. If the local agency’s proposal is consistent with the principles in the RCP, no change would be required. Therefore, we do not believe a wording change is necessary.

L-13 SANDAG is not suggesting what measures should be implemented by a lead agency for establishing buffers. This issue will need to be addressed on a project by project basis. In some cases, new development adjacent to agricultural uses may not need any setbacks other than a physical barrier (fence) to keep people out of the agricultural uses. Other operations may require substantive setbacks to avoid significant land use impacts (e.g., dust, noise, odor, contamination). Mitigation measure LU-2 was identified as a way to minimize any land use incompatibility issues of placing non-agricultural uses adjacent to agricultural uses.

SANDAG is also not suggesting new restrictions to farmers. The EIR has considered the potential impacts of proposing new land uses that may be incompatible with agricultural uses. The County already has substantive requirements for analysis of impacts to agricultural resources from a proposed project.

Mitigation measure LU-2 has been modified. The revised mitigation measure is presented below and appears in Table 1.6-1 and on page 5.1-22 of the Final EIR.

LU-2 Local jurisdictions shall discourage conversion of agricultural lands outside of planned urbanized areas. When proposed development significantly conflicts with established agricultural operations, appropriate buffers shall be incorporated into the project design to reduce the land use incompatibility to below a level of significance.

L-14 Mitigation measures LU-3 has been modified to reflect the comment. The revised mitigation measure is provided below and appears in Table 1.6-1 and on page 5.1-23 of the Final EIR.
LU-3 Local jurisdictions shall avoid conversion of MRZ-2 lands until the existing mineral resources on that land have been exhausted, or are no longer economically feasible to process or market.

L-15 Mitigation measures LU-4 has been modified to reflect the comment. The revised mitigation measure is presented below and appears in Table 1.6-1 and on page 5.1-23 of the Final EIR.

LU-4 Project-level noise impact analysis shall be performed, where appropriate, to ensure that changes in land uses and densities do not result in significant noise conflicts or impacts. Noise mitigation measures recommended in these analyses shall be implemented that reduce impacts associated with land use incompatibility to the levels established by each jurisdiction for the appropriate land use.

L-16 This discussion is associated with the significant and unmitigated population and housing impact, not with mitigation measure LU-5. Measure LU-5 calls for the preparation of an Urban Design Best Practices Manual.

SANDAG does not have legal authority to require land use authorities to amend their general plans to accommodate growth. The RCP is an incentive-based plan, and the mitigation measures are for those agencies that have land use authority to consider when they undergo plan updates. However, the State Department of Housing and Community Development (HCD) has regulatory authority over the housing elements of local jurisdiction's general plans, as determined by California Government Code Section 65580. SANDAG plays a role in the housing element process, as stipulated by California Government Code Section 65584, which requires SANDAG to consult with HCD to determine the regional housing need, and to allocate this need by jurisdiction and income level. Jurisdictions must then show they have adequate sites with appropriate zoning, development, and infrastructure capacity to meet this need (Section 65583).

L-17 The statement regarding the adoption of alternatives to reduce the significant impact has been removed. Please see page 1-17 of the Final EIR.

L-18 Mitigation measures Vis-1 through Vis-5 are recommendations for local jurisdictions. If a local jurisdiction plans to use the RCP EIR for subsequent environmental review, then adherence to these mitigation measures would be required, otherwise the measures serve as recommendations. No changes have been made to the mitigation measures based upon this comment.

L-19 Please see response to comment L-7 for a discussion of SANDAG’s responsibility in identifying feasible mitigation measures that may be the responsibility of other jurisdictions. Mitigation measure Vis-6 has been revised to state that it applies only to development projects that could potentially impact scenic vistas. The
revised mitigation measure is presented below and appears in Table 1.6-1 and on page 5.3-10 of the Final EIR.

Vis-6 Project applicants that propose future development adjacent to the ocean or bays that could potentially impact scenic vistas shall prepare visual simulations to determine what level of view impact the project will have on the scenic vista. Measures to reduce adverse impacts to view corridors shall be implemented (e.g., reducing bulk and scale).

L-20 The Urban Design Best Practices Manual (UDBPM) will be prepared by SANDAG and distributed to local jurisdictions. Since the County is a member of SANDAG, it is assumed that the County will participate in the review and approval process.

The UDBPM will serve as a guidance document only. There will not be a mandate that local jurisdiction abide by the recommendations in the UDBPM. Other requirements by the local agencies are at discretion of the local lead agency.

L-21 Mitigation measure Air-1 has been revised to state that it only applies to projects that are identified as exceeding the daily construction emissions threshold established by SDAPCD. Additionally, the measure has been revised to state that BACMs shall be incorporated to reduce these emissions to below the threshold established by APCD, and sample BACMs have been added. The revised mitigation measure is presented below and appears in Table 1.6-1 and on page 5.5-19 of the Final EIR.

Air-1 For projects that exceed daily construction emissions established by SDAPCD, Best Available Control Measures (BACMs) shall be incorporated to reduce construction emissions to below daily emission standards established by SDAPCD. Appropriate BACMs will be determined on a project by project basis, and are specific to the pollutant for which the daily threshold has been exceeded. BACMs that may be appropriate for construction activities that exceed daily ROG thresholds include using precoated building materials, using high pressure/low volume paint applicators, and using lower volatility paint. BACMs that may be appropriate for construction activities that exceed daily CO, NOx or SOx thresholds include phasing of construction activities.

L-22 Mitigation measure Noise-1 has been revised to reflect the comment. The revised mitigation measure is presented below and appears in Table 1.6-1 and on page 5.6-10 of the Final EIR.

Noise-1 Site planning shall be conducted in a manner that avoids impacts to noise sensitive areas (e.g., residences, hospitals, schools, libraries,
and sensitive receptors. Sensitive receptors include both humans and noise-sensitive wildlife species. The distance between the noise source and the sensitive receptors shall be adequate to reduce noise levels to acceptable levels (CNEL identified in local land use plan for humans, or generally accepted dBA for wildlife species). Other noise attenuation techniques, such as sound walls or landscaping may be used to reduce noise impacts to levels that are consistent with the local jurisdiction’s requirements.

L-23 Many transportation facilities generate noise (e.g., airports, railroad, and roadways). Although the RCP encourages densities adjacent to transit corridors, with the intended goal of increasing the reliance on mass transit opportunities, the RCP recognizes the need to balance locating sensitive receptors (e.g., residents) adjacent to some of the noisier elements. Site specific review needs to be conducted by each jurisdiction to evaluate the local constraints. Some locations may not be suitable for residential use due to unacceptable noise levels. The local jurisdictions currently use zoning to restrict unacceptable land use conflicts. It is expected that local jurisdiction will continue to use zoning as a strategy to reduce conflicts. The EIR identified a potential conflict (resulting in a potential significant impact) could occur if these site specific constraints are not considered in future planning efforts in response to the RCP.

L-24 Operational constraints are an acceptable, feasible mitigation measure. If there are safety issues, this would, of course, override the measures from implementation. However, if operational constraints can be implemented safely, these measures should be considered in the “tool box” of mitigation. No change has been made to the EIR based upon this comment.

L-25 It should be recognized that the lead agency responsible for land use authority will be responsible for determining the necessity of these or other mitigation measures at the time of environmental review of subsequent discretionary actions. The revised mitigation measure is provided below and appears in Table 1.6-1 and on page 5.6-10 of the Final EIR.

Noise-4 Avoid noise and vibration impacts by the careful siting of facilities and the use of noise-reducing berms, walls, or other barriers, as deemed appropriate by local lead agency.

L-26 Mitigation measure Paleo-1 has been revised to reflect the comment. The revised mitigation measure is provided below and appears in Table 1.6-1 and on page 5.8-14 of the Final EIR.

Paleo-1 When a construction activity will significantly disturb the unweathered bedrock in areas identified as having a...
moderate or high potential to support paleontological resources, a qualified researchers must be stationed on site to observe grading operations and recover scientifically valuable specimens. A certified paleontologist shall be retained (or required to be retained) by the project implementing agency prior to construction to establish procedures for surveillance and pre-construction salvage of exposed resources if fossil-bearing rock have the potential to be impacted. The monitor shall provide pre-construction coordination with contractors, oversee original cutting in previously undisturbed areas of sensitive formations, halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, and oversee fossil salvage operations and reporting. This measure shall be placed as a condition on all grading plans where grading is proposed in geologic units defined as having a moderate or high potential for containing fossils.

L-27 The EIR evaluated the potential for hydrology/water resource impact that would occur with implementation of the RCP. See Section 5.9 of the EIR for the detailed analyses. The summary in Section 5.9 identified a potential impact to occur due to the increase in impervious surfaces and erosion was likely to result. Drainage capacity (including, but not limited to storm drains, detention facilities, sediment control facilities) could be adversely affected. These issues should be address both on site, as well as offsite (inadequate storm drain facilities).

To avoid adverse impacts from both the runoff standpoint as well as water quality perspective, these improvements should be conducted concurrently with the future development.

L-28 The EIR has discussed in several sections that implementation of the RCP will have beneficial changes when compared and contrasted against the existing general plans in effect. However, CEQA mandates that the analysis evaluate impacts based upon the existing setting. The specific text from State CEQA Guidelines Section 15125(a) is provided below:

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.
The analysis concluded that future growth could occur that depletes groundwater. It is recognized that with the RCP, this impact could be less than the No Project/Existing Plans alternative; however, under an analysis conducted in a manner consistent with CEQA, there is a potential for a significant impact.

The Final EIR has been revised to reflect the change to Mitigation Measure Water-3. This change was based on a comment received from the SDCWA. The revised mitigation measure is presented below. The new mitigation measure appears in Table 1.6-1 and on page 5.9-16.

**Water-3** Future projects that use groundwater are required to adhere to a “no net loss” of groundwater resources strategy. Projects that deplete existing groundwater resources are required to incorporate ground water recharge or other types of safe yield strategies to maintain adequate groundwater table elevations.

**L-29** At the time a discretionary permit is requested, the lead agency will conduct their standard review for potential impacts to cultural resources. If the lead agency determines that based upon evidence there is no potential for cultural resource impact, then no additionally surveys would be conducted. If, through the CEQA process, the potential for impacts cannot be determined without a record search/survey, then the lead agency will need to make that determination.

Mitigation measure Cult-1 has been modified to incorporate this comment, as well as comments provided by the San Diego County Archaeological Society. The revised mitigation measure is presented below. The new mitigation measure appears in Table 1.6-1 and on page 5.11-10 of the Final EIR.

**Cult-1** A review of literature and historic maps, a records search, and field survey to identify the presence or absence of cultural resources for each future development project shall be undertaken if the jurisdiction determined these studies are warranted. Prior to any development where possible impacts to significant cultural resources may occur, each cultural resource will need to be evaluated through testing programs to determine the significance/importance prior to determining mitigation of proposed impacts or providing recommendations for preservation. Historic resources may require analysis by a qualified historian or an architectural historian. Sites identified as significant/important will need to be avoided by development impacts or mitigated by completion of a data recovery program conducted in compliance with CEQA and agency guidelines. Site avoidance and preservation can include capping the site with gravel or construction fabric and 16 to 18 inches of sterile fill soil. Sites proposed for capping shall be indexed so future researchers have reasonable knowledge of the resources that have been protected.
Capped sites can be landscaped with native, shallow rooted plants that are compatible with the surrounding biologic habitat. Passive uses for capped sites include trails, picnic and play areas, parking lots, and tennis or volleyball courts. A data recovery program for archaeological sites consists of excavation of a percentage of the site (determined in consultation with the local agency) to provide information necessary to answer significant research questions.

L-30 Mitigation measure Cult-2 has been modified to reflect the comment. The revised mitigation measure is presented below. The new mitigation measure appears in Table 1.6-1 and on page 5.11-11 of the Final EIR.

Cult-2 Site planning shall emphasize avoidance of significant archaeological and historical resources.

L-31 Mitigation measure Cult-3 has been modified to reflect the comment. The revised mitigation measure is presented below and appears in Table 1.6-1 and on page 5.11-11 of the Final EIR.

Cult-3 For future development project, lead agencies shall integrate curation of all archaeological and/or historical artifacts and associated records in a regional center focused on the care, management and use of archaeological collections. Curated materials shall be maintained with respect for cultures and available to future generations for research. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring.

L-32 Mitigation measure Cult-4 would only be applicable to historical resources that were determined to be significant, otherwise no mitigation would be required. Therefore, the requested language change is redundant. No change has been made to mitigation measure Cult-4.

The Urban Design Best Practices Manual (UDBPM) will be prepared by SANDAG and distributed to local jurisdictions. The UDBPM will provide guidance on measures that can be used to effectively integrate historical resources into adaptive reuse/redevelopment projects. The UDBPM will serve as a guidance document, however SANDAG will provide incentives for local jurisdictions to adopt these best practices. There will not be a mandate that local jurisdiction abide by the recommendations in the UDBPM.

L-33 Mitigation measure Cult-6 has been modified to reflect the comment. However, it should be clarified that if any local agency has more restrictive guidelines, policies, regulations, or ordinances, these would remain in effect and supersede any mitigation measures within the RCP. Due to the diversity of resources within the region, and the diversity of ordinances within the jurisdictions, it was appropriate for the EIR to provide this level of mitigation.
The revised mitigation measure appears below and in Table 1.6-1 and on 5.11-11 of the Final EIR.

Cult-6 Significant historic structures and buildings that will be demolished as a part of future projects will need to be documented by a qualified architectural historian. A copy of the documentation will be retained by the local jurisdiction. When local jurisdictions have more strict standards regarding the treatment of historic structures, the local jurisdictions’ policies shall be used.

L-34 Please see response to comment L-7 regarding the identification of feasible mitigation measures and the option for local jurisdictions to implement the proposed mitigation measures.

Mitigation measures ServSys-2 has been revised to include drought tolerant plant species as a landscaping option. The revised mitigation measure appears in Table 1.6-1 and on page 5.12-14 of the Final EIR.

ServSys-2 Future construction shall incorporate water efficient appliances (e.g., low-flush toilets and shower heads), xeriscaping, and/or drought tolerant plant species.

L-35 The issue of water supply has not been deferred. The EIR has concluded that the increase in demand would result in a significant impact. As noted on page 5.12-15, any increase in population associated with implementation of the RCP will result in an increase in the need for potable water. This represents a potentially significant impact that can be mitigated to below a level of significance through implementation of mitigation measures ServSys-1, ServSys-2, and Serv-Sys4.

While the SDCWA (comment letter N) has indicated that they have sufficient flexibility in the Regional Water Facilities Master Plan to adequately serve the population increase associated with the RCP, updated modeling will need to occur to incorporate the new population numbers. Mitigation measures ServSys-1 will reduce the impact to below a level of significance.

L-36 The recommended text change identifying communities in the unincorporated County under consideration as a potential SGOA has been made. Please see pages 1-3, 3-7, and 6-31 of the Final EIR.

L-37 This EIR is a Program EIR for the RCP. Subsequent implementation projects that are an activity associated with the RCP should review those projects for consistency with the RCP EIR. In accordance with State CEQA Guidelines Section 15168(b)(5) this will allow for a reduction in paperwork.
Policy Objective 7 in the Transportation chapter states, "Give priority to serving regional roadway and transit investments in smart growth opportunity areas while recognizing the need for transportation improvements elsewhere in the region." The referenced policy objective will not be deleted, as requested, since a primary urban form goal of the RCP is to focus future population and job growth away from rural areas and closer to existing and planned job centers and public facilities.

The discussion of the unincorporated County included in the Draft EIR has been removed and replaced with the text suggested in the comment. The new discussion is provided below and appears on page 5.1-6 of the Final EIR.

**Unincorporated Areas**

San Diego County has identified 23 community and sub-regional areas throughout the unincorporated county. Unincorporated communities adjacent to incorporated cities tend to have more urbanized land use patterns. Other San Diego County communities typically have an identifiable community core surrounded by more rural land use patterns. The unincorporated portion of the County has a population of approximately 446,000, a housing stock of approximately 153,000 units, and has approximately 106,000 jobs.

The discussion of the County’s General Plan Update included in the Draft EIR has been removed and replaced with the text suggested in the comment. The new discussion is provided below and appears on page 5.1-10 of the Final EIR.

General Plan 2020 (GP2020) is a comprehensive update of the San Diego County General Plan, establishing future growth and development patterns for the unincorporated areas of the County. It will identify the potential size and distribution of the County’s future population – balancing housing, employment and infrastructure needs with resource protection. Compared to the existing General Plan, this update will focus population growth in the western areas of the County where infrastructure and services are more readily available.

General Plan 2020 distributes 80% of the future population to unincorporated communities inside the San Diego County Water Authority (SDCWA) Boundary. The plan also reduces low-density development and increases medium to high-density development in North and East San Diego County communities. The plan proposes increased housing densities within the village limit line of various rural communities but has reduced development densities in outlying backcountry areas.

A 3% increase threshold was used for the analysis of regional-level population, housing, and employment impacts. At a local level, the percentage increases
would be more than 3%. During the preparation of the EIS/EIRs for the Multiple Habitat Species Conservation Plan (MHCP) and for the Multiple Species Conservation Plan (MSCP), the changes in residential densities were used as the threshold for significance. It was stated that residential shifts of up to 10% can be accommodated; however, changes above 10% results in a change in neighborhood character. Thus, the 10% was used as a threshold since it has been characterized as when a change in the community character is perceptible.

L-42 The significance criteria used for the cumulative analysis of air quality is consistency with the RAQS. The analysis also addressed NOx, a precursor to ozone. The analysis concluded that there would be an air quality violation related to CO hot spots. Please see page 7-7 of the Final EIR.

L-43 The second significance threshold was discussed on page 5.6-7 of the EIR. Specifically, it states:

New development would need to conform to all applicable noise standards and regulations within their local jurisdiction, and mitigation for new development can be imposed through discretionary approvals.

Since noise is a highly localized impact, specific and detailed analyses at the project level will be most appropriate. Each project would require its own noise study as part of the environmental assessment and review process. These noise studies would determine specific areas of noise impact and would recommend mitigation measures to reduce noise levels.

Construction activities related to implementation of the RCP would potentially generate short term noise impacts to sensitive land uses located adjacent to construction sites. However, local governments typically regulate noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation), implementation of general plan policies, and imposition of conditions of approval for building or grading permits. Therefore, noise related to construction activities associated with implementation of the RCP would be less than significant.

L-44 The discussion regarding the requirement for noise impact studies has been revised. The discussion now reads that a noise impacts study would be required for future development projects which are identified as having potential noise impacts. The revision is provided below, and appears on page 5.6-7 of the Final EIR.

Since noise is a highly localized impact, specific and detailed analyses at the project level will be most appropriate. Future development projects which are identified as having potential noise impacts would be required to prepare a noise study as part of the environmental assessment and
review process. These noise studies would determine specific areas of noise impact and would recommend mitigation measures to reduce noise levels.

This is a standard assumption that the lead agency will need to evaluate any discretionary project in accordance with CEQA, to determine the potential for significant impacts. If no impact is identified (this does not require detailed modeling, but standard review by an analyst), then no further review is necessary.

L-45 The impact to comprehensive resource planning areas, such as NCCPs and HCPs, was addressed on page 5.10-12 and 5.10-13 of the EIR. Analysis of impacts to specific plans were not addressed, rather the analysis considered generalized impacts, as is appropriate for a programmatic level document.

L-46 The RCP is a programmatic level plan that has not designated the location of the density; however, increased population levels will contribute to the existing demand for services. Because these providers have not incorporated this increase in population, this will result in an unplanned increase in demand. Because the site specific location and existing capacity is not known, it cannot be ascertained whether the demand will cause a provider to exceed their capacity. However, because most jurisdictions plan for demand as there is an increase in demand, these services are anticipated to result in a significant impact.

The issue of water supply has not been deferred. The EIR has concluded that the increase in demand would result in a potentially significant impact. However, the SDCWA (comment letter N) has indicated that they have sufficient flexibility in the Regional Water Facilities Master Plan and future water supplies to adequately service the increase in population anticipated with implementation of the RCP once their Regional Water Facilities Master Plan is updated to reflect the revised population figures. This requirements is included in mitigation measure ServSys-1, and implementation of that measure will reduce the water supply impact to below a level of significance.

L-47 Please see response to comment L-46 and comment letter N from the SDCWA.

L-48 Implementation of the RCP will result in significant impacts to public services, including park and recreation services. Mitigation measures ServSys-5 indicates that future projects are required to pay public facility finance fees in accordance with the requirements of the jurisdiction in which the project is proposed. These fees will be used for public services and facilities, including parks and recreation services/facilities. Implementation of mitigation measures ServSys-5 will reduce this impact to below a level of significance.

L-49 A concluding summary regarding water supply has been added. Please see page 5.12-14 of the Final EIR. The summary is provided below:
Any increase in population association with implementation of the RCP will result in an increase in the need for potable water. This represents a potentially significant impact that can be mitigated to below a level of significance through implementation of mitigation measures ServSys-1, ServSys-2, and ServSys-4.

L-50 The Land Use analysis discussion for the No Project/Existing Plans Alternative indicates that the alternative would result in impacts to a greater amount of undisturbed vacant land, agricultural land, open space, and other natural resources. Therefore, impacts to agricultural resources were addressed under this alternative. A statement has been added to page 6-7 indicating that this alternative would not result in a loss of availability of locally important mineral resources.

The Land Use analysis discussion for the SGOA – Increased Intensity Alternative also noted that the alternative would result in a greater amount of undisturbed vacant land, agricultural land, open space, and other natural resources. Therefore, impacts to agricultural resources were addressed under this alternative. A statement has been added to page 6-23 indicating that this alternative would result in a loss of availability of locally important mineral resources.

L-51 A statement has been added to page 6-14 indicating that this alternative would result in a loss of availability of locally important mineral resources.

L-52 The SGOA- Increased Intensity Alternative would potentially result in an addition of 75,000 units in the San Diego region compared to 46,000 units for the Proposed Project. The impact to water supply will be proportionally greater under this alternative compared to the Proposed Project.

L-53 Mitigation measures identified for the Proposed Project are also applicable to the proposed alternatives. Statements have been added to each analysis area of each alternative noting this. Please see pages 6-16 though 6-35 of the Final EIR.

L-54 A statement has been added stating that vibration impacts could also result from future mass transit and transportation projects in the cumulative project area. However, it is noted that vibration impacts tend to be more localized, and, therefore, this impact would be less than significant at the cumulative level. Please see page 7-8 of the Final EIR for the revised text.

L-55 The discussion on mitigation for paleontological impacts has been updated to reflect the new language in mitigation measures Paleo-1. Please see page 7-9 of the Final EIR.

L-56 Holders of direct discharge permits will be required to adhere to existing water quality requirements and regulations, which are in place to protect natural resources and water quality.
L-57 The EIR adequately analyzed cumulative impacts related to water supply and water facilities. The increase in population between now and 2030 will require the expansion of water facilities to meet the future demand. It should be noted whether the future population is located in Orange, Riverside, Imperial or San Diego County, they are generally going to be served predominantly by waters that originate from the MWD. It is speculative to determine where, specifically, the population growth will occur. However, since new facilities will be required, the determination was made that the project would result in a significant cumulative impacts related to water.

L-58 Mitigation measure LU-1 has been revised. Please see response L-12.

L-59 Please see response to comment L-9.

L-60 Transportation and Circulation were addressed in Section 5.4 of the EIR. Regional roadway impacts were analyzed by looking at the existing roadway LOS and comparing it to the anticipated LOS in 2030. The RTP anticipated the incorporation of smart growth planning in the region’s future. It used SANDAG’s preliminary 2030 growth forecast, which assumed approximately 46,000 more units in places similar to those illustrated in Figure 3.4.1

L-61 An assessment of general plan conformity for each jurisdiction is not feasible at this time. It was recognized in the Section 5.1 of the EIR that some inconsistencies with existing general plans may occur with implementation of the RCP. Future coordination between SANDAG and local jurisdictions will work to refine the SGOA, with the goal of identifying the specific areas. At that time, SANDAG and local jurisdictions will be able to determine what changes to the general plans are required. The RCP does not require compliance by local jurisdictions. It is an incentive-based and collaborative plan. The RCP does not ask local jurisdictions to accept a particular portion of the exported housing units, rather it encourages and provides incentives for local jurisdictions to identify smart growth areas and make changes to local land use plans as necessary.

Pursuant to CEQA Guidelines Section 15145,

“If, after through investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impacts.”

L-62 The transportation analysis looks at the existing LOS and the forecast LOS for the major regional networks. The forecast LOS is based upon implementation of the RTP, which was approved by the SANDAG Board in 2003. The changes between existing LOS and future LOS were discussed in the EIR. Please see page 5.4-15 of the Final EIR. At this time, because of the uncertainty of the location of the SGOA and associated densities, traffic impacts cannot be modeled. However, due to the likelihood that, in some locations in the region, these local arterials will be
adversely affected, the EIR concluded that there would be significant and unmitigated impacts to the localized circulation network.

L-63 The EIR concluded impacts may be unmitigable. SANDAG acknowledges the County’s comment that not all roadways can be improved. A variety of engineering, economic, environmental, or community character related issues may prevent a roadway from being expanded.

L-64 The rationale behind using a comparison/ranking is discussed in Section 6.4 of the EIR. As noted on page 6-39:

Generally, each alternative has been compared and ranked 1 through 5 as “no impact” to “much greater impact.” The Proposed Project was ranked “3” for all issues. Each alternative was then compared to the impact characterized for the Proposed Project and a ranking identified.

State CEQA Guidelines Section 15126.6(d) provides guidance on the evaluation of alternatives, including the statement that the alternatives are to be compared to the Proposed Project. Specifically, Section 15126.6(d) states:

“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”

Therefore, to accomplish a comparison the scale needed to have room higher and lower because some of the impacts for the alternatives were beneficial, and some were adverse, when compared to the Proposed Project. Therefore, the Proposed Project was assigned a value of 3. Then, an alternative that had a slight benefit got a rating of 2, a great benefit a rating of 1. Conversely, if an impact was negative, there were two available ratings to allow for comparison of the magnitude. It is fully recognized that from a CEQA perspective some of these impacts were significant (or less than significant) for all alternatives. However, from a comparison standpoint, some of the impacts were at a greater or lesser degree of magnitude compared to the Proposed Project. The comparison in Table 6.3-1 was not intended to depict the significance of impacts. That analysis and comparison were including in Section 1 (Executive Summary) and Section 6 (Alternatives) of the EIR.

L-65 The RCP does not require compliance by local jurisdictions. It is an incentive-based and collaborative plan. The RCP does not ask local jurisdictions to accept a particular portion of the exported housing units, rather it encourages and provides incentives for local jurisdictions to identify smart growth areas and make changes to local land use plans as necessary.

L-66 The EIR analyzed the cumulative impacts of the RCP in Section 7.0 of the EIR. The EIR concluded that implementation of the RCP would contribute to
cumulative impacts in the following areas: land use, visual resources, transportation/circulation, air quality, noise, energy, geology/paleontology, hydrology/water quality, biological resources, cultural resources, and public services/utility systems.

L-67 The additional information regarding the location of, and access to, the 18 Indian reservations has been added. Please see page 4-2 of the Final EIR.

L-68 Table 5.4-1 was included to show LOS for major regional transportation network. The table has been expanded to provide LOS for all Caltrans facilities in the study area, including the unincorporated County.

L-69 The requested change has been made. Please see page 5.4-12 of the Final EIR.

L-70 The Final EIR has been revised to reflect existing and forecast LOS on all Caltrans facilities in the County. Please see Table 5.4-2 in the Final EIR.

L-71 The travel time analysis was derived from the 2030 Regional Transportation Plan (RTP). The origin-destination pairs were selected to demonstrate travel times by mode along key regional transportation corridors, which connect major residential and employment centers in the region. The travel time analysis was used to evaluate RTP alternatives which included different levels of transportation (roadway and transit) investments along key corridors.

L-72 Additional analysis, in conjunction with local jurisdictions, is required to further refine the specific areas within the SGGA where the future development will be targeted. At the time these areas are located, it would be appropriate to perform additional analysis regarding transportation impacts on the localized transportation network.

L-73 The EIR disclosed the following impacts to regional roadways on page 5.4-19 of the Final EIR:

> It should still be recognized that individual development projects would have significant, and in some cases, unmitigated transportation impacts on local streets and transportation systems. Increasing intensities along the major transportation corridors (Figure 5.4-1) would be expected to create localized congestion that may reduce LOS to E or F. Although public transit opportunities will be provided, individual preferences will likely result in an increase of local congested conditions, thus resulting in significant localized impacts to roadway segments and intersections.

And to adopted circulation elements (also page 5.4-20):

> Implementation of the RCP would result in significant impacts to the capacity of local street systems. These impacts can also represent a conflict with local circulation elements. In the event that the localize
transportation network impacts are so severe, roadway and intersection expansions beyond the maximum buildout in local circulation plans may be required. Any expansion beyond the buildout identified in the local plans represents a conflict, and a significant impact.

L-74 This comment provides closing remarks.
May 13, 2004

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Dear Mr. Rundle

Thank you for the opportunity to review and comment on the Draft Program Environmental Impact Report (PEIR) for the Regional Comprehensive Plan (RCP). As referenced in the RCP, the San Diego County Regional Airport Authority is the Airport Land Use Commission for San Diego County and responsible for preparing and adopting a regional Comprehensive Land Use Plan covering all airports in San Diego County. The following comments are for both the RCP and the Draft PEIR.

Comments on the RCP

M-1

1. Page 134: Incorrect reference to "San Diego International Airport Authority". Replace with San Diego County Regional Airport Authority.

Comments on the Draft PEIR

M-2

2. Section 5.1 Land Use, Page 5.1-13 states "The military airports are exempt from the state's requirements for a CLUP." This is incorrect and should be revised to reflect the 2002 revisions to the California Public Utility Code. Military airports are no longer exempt from the requirement for a CLUP, and the ALUC is required to formulate a CLUP for military airports consistent with the safety and noise standards in the Air Installation Compatible Use Zone (AICUZ) for that airport.

Public Utilities Code Section 21675 subdivision (a) states that each ALUC "shall formulate a comprehensive land use plan that will provide for the orderly growth of each public airport within the jurisdiction of the commission..." Public Utilities Code section 21675 (b) states that the ALUC "...include within its plan formulated pursuant to subdivision (a), the area within the jurisdiction of the commission surrounding any federal military airport for all the purpose specified in subdivision (a) ..."

M-3

3. Section 5.6 Noise, Page 5.6-3. Table 5.6-1 is not consistent with the text analysis nor the State of California's standards for land use compatibility for Community Noise Environments. Table 5.6-1 shows residential, hotel and public assembly uses as conditionally acceptable up to a 70 CNEL and office buildings and commercial uses as conditionally acceptable up to a 75 dB CNEL. This is not consistent with the State of
California's standards. For example, the State of California does not identify residential land uses in a 65 db CNEL or greater noise contour as conditionally compatible. Table 5.6-1 contains other inaccurate information and this table should be replaced entirely with a table consistent with the State of California's standards (we recommend referring to the Caltrans' 2002 Airport Land Use Planning Handbook).

Section 5.6 Noise, Page 5.6-4 and 5.6-5. The Noise section should include an analysis of Airport Noise and specifically list the nine airports with adopted Comprehensive Land Use Plans (CLUP). The Noise section should describe that development within an airport influence areas (and an airport's noise contours) should be compatible with the adopted airport CLUP and implement any conditions required by the CLUPs. The nine adopted airport CLUPs are for San Diego International Airport, Montgomery Field, Brown Field, Borrego Valley Airport, Fallbrook Community Airport, McClellan-Palomar Airport, Gillespie Field, Marine Corps Air Station Miramar and Oceanside Municipal Airport. The San Diego County Regional Airport Authority is required to prepare a new regional airport CLUP by June 2005 that will include all airports, including those County airports and military air stations that do not have adopted CLUPs (i.e. Ramona Airport, Naval Air Station North Island, etc).

Section 5.6, Page 5.6-11 - Development Near Airports. This section briefly discusses that mitigation measures Noise-1, Noise-2 and Noise-5 would reduce noise impacts to below a level of significance. This section should be revised to describe that CLUPs contain conditions such as sound attenuation and aviation easements that shall be required by jurisdictions to ensure that developments are compatible surrounding airports. This revision should also be addressed in Executive Summary, Page 1-21 at the top of the page.

Thank you for the opportunity to review and comment on the RCP and Draft PEIR. We respect the considerable effort completed by SANDAG to address these regional transportation issues and we would be happy to assist you in addressing these comments. If you need additional clarification or would like to meet to discuss these comments further, please contact Ted Anasis at (619) 400-2478 or via e-mail at tanasis@san.org.

Sincerely,

Angela Shafer-Payne
Vice President, Strategic Planning

ASP/TAR/as
Letter M          San Diego Regional Planning Authority

M-1 This comment points out an error in the RCP document, not the EIR. The requested text change has been made to correctly identify the San Diego County Regional Airport Authority. No changes were made to the EIR based on this comment.

M-2 The Final EIR has been revised to state that the Airport Land Use Commission (ALUC) is responsible for the preparation of Comprehensive Land Use Plans (CLUP) for both civilian and military airports. The new text appears on page 5.1-13 of the Final EIR.

M-3 This comment requests changing Table 5.6-1 in the EIR. This table is from the State of California General Plan Guidelines prepared by the Governor’s Office of Planning and Research. This table is provided by the State to help guide local jurisdictions in determining noise compatible land uses. The table has been replaced with a clearer version in the Final EIR, however, the information on the table remains the same.

M-4 Only regional-level analysis has been conducted to identify possible locations Smart Growth Opportunity Areas that could potentially support additional growth. Based upon the potential areas identified in Figure 3.4-1 of the EIR, areas within the vicinity of airports are under consideration. If the RCP is implemented, further analysis will be conducted with local jurisdictions to refine the locations. At that time, local constraints will be considered, including the proximity to an airport. No change has been made to the EIR based upon this comment.

M-5 The Final EIR has been revised to include a statement about the conditions required by local jurisdiction to ensure compatibility between the airport and surrounding uses. The new text is provided below and appears on page 5.6-7 of the Final EIR.

It should be noted that the adopted CLUP for each airport contains conditions such as sound attenuation and avigation easements that shall be required by local jurisdictions to ensure developments surrounding the airport are compatible

Additionally, this language has been made into a mitigation measure to assist in reducing airport noise impacts to below a level of significance. The new measure is provided below and appears on page 5.6-11 of the Final EIR.

Noise-6 Future development projects that are located in the vicinity of regional airports shall consider noise mitigation conditions recommended in the appropriate airport Comprehensive Land Use Plan.
This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 13, 2004

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

Subject: Comments on the Notice of Availability of a Draft Program Environmental Impact Report for the Regional Comprehensive Plan for the San Diego Region

Dear Mr. Rundle:

Thank you for providing the San Diego County Water Authority (Water Authority) with a copy of the above-referenced document. The Water Authority has reviewed the relevant portions of the document and offers the following comments and clarifications.

Hydrology/Water Resources

Ground Water

Page 5.9-9, Ground Water, Section 5.9.1, Existing Conditions

The discussion of ground water under the Existing Conditions section presents an inaccurate summation of the ground water picture within the San Diego region. This section of the document utilized ground water information obtained from the Water Authority’s website to author this segment, without further consultation of this agency. We ask that the ground water discussion found on pages 5.9-9 through 5.9-11 of the draft PEIR be stricken in its entirety, and ask that the following re-written section be inserted into the final PEIR document. (Strikethrough indicates deleted words and underline indicates inserted words within this comment letter):

Groundwater

Public water agencies within the Water Authority’s service area currently use about 18,000 acre-feet of groundwater annually. In addition, private well owners also draw on local basins for their water supplies. The amount of groundwater pumped from private wells, both within the Water Authority’s service area and outside of the Water Authority’s service area in eastern San Diego County, is suspected to be significant, but has not to date been accurately quantified for the region.
Groundwater supplies within San Diego County are limited by both the geology and the semi-arid hydrologic conditions of the region. Narrow river valleys with shallow alluvial deposits are characteristic of many of the more productive groundwater basins. Outside of these alluvial basins, much of the geology consists of fractured crystalline bedrock and fine-grained sedimentary deposits that are generally capable of yielding only small amounts of groundwater to domestic wells. Although groundwater supplies are less plentiful in the San Diego region than in some other areas of southern California, such as the Los Angeles Basin, sufficient undeveloped supplies do exist to help meet a portion of the region’s future water needs.

Several agencies within the Water Authority’s service area have identified potential projects that could increase groundwater production to close to 60,000 acre-feet by the year 2020. The types of groundwater projects fall into three basic categories. The first, groundwater extraction and disinfection projects, are generally located in basins with higher water quality levels where extracted groundwater requires minimal treatment for use as a potable water supply. The second, brackish groundwater recovery projects, are typically implemented in basins that have been impacted by imported water irrigation or by seawater intrusion. These types of projects use desalination technologies, such as reverse osmosis (RO), to treat extracted groundwater to potable water standards. The final category, groundwater recharge and recovery projects, improve groundwater basin yields by supplementing natural recharge sources with potable or possibly recycled water.

Page 5.9-17, Mitigation Measure Water-3

This mitigation measure should include development of a basin management plan that would include actions to avoid depletion of existing groundwater resources. Recharge could be part of the plan, but managed extraction from the basin to maintain the safe yield should be included. Further, who would be the party responsible for implementing either the recharge or basin management programs? Where would the water supply come from to provide the recharge required under this mitigation measure to maintain adequate ground water levels?

Page 5.9-18, Ground Water, Summary of Impacts With Significance Conclusions

As mentioned above, the Water Authority questions where the water supply would come from to recharge depleted ground water levels under Mitigation Measure Water-3. If imported water is identified as the source to recharge ground water basins, this would create another, separate impact to the regional water supply. Impacts to the imported supply should be considered in the significance discussion and conclusion, if imported water is to be used as mitigation for ground water depletion.

Biological Resources

Page 5.10-14, Section 5.10.4, Impact Analysis

The discussion on this page following the question, "Would the RCP substantially degrade the quality of the environment, reduce the habitat of a fish or wildlife species,..." does not include the Multiple Species Conservation Program or the Multiple Habitat Conservation Program. Why
are these programs not mentioned here? They are designed to address the very issue being analyzed in this discussion. Please explain as to why these programs are not mentioned in this discussion.

Page 5.10-14, Section 5.10.5, Mitigation Measures

Mitigation measure Bio-10, dealing with marine impacts, is too narrow for a program level of analysis and does not afford agencies the flexibility of identifying future mitigation measures that may be effective at the project-specific level. Please change Bio-10 to read as follows in the final PEIR: “Ensure that future coastal projects are sited and designed as to minimize impacts to marine resources. Any unavoidable impacts shall be mitigated through habitat creation such as replacement to result in no net loss of habitat value appropriate mechanisms.”

Public Services/Utility Systems

Water Supply

Page 5.12-1, Water Supply, Section 5.12.1, Existing Conditions

Under the first paragraph, the following changes are submitted for use in the final PEIR:

Third sentence is changed to read: “SDCWA currently imports 75 to 95 percent of the region’s water supply exclusively primarily through the Metropolitan Water District of Southern California (MWD), with increasing amounts of conserved agricultural water from the Imperial Irrigation District.”

Last sentence is changed to read: “The remaining water comes from groundwater sources local supply sources within the SDCWA service area.”

Water Infrastructure

Page 5.12-3, Water Infrastructure

The following changes are submitted for use in the final PEIR:

First full paragraph, last sentence is changed to read: “Construction of the dam is underway is complete and filling of the reservoir has commenced. The ESP project also includes approximately 20 miles of large diameter pipeline, five major pump stations and the raising of a second dam.”

Third paragraph, last sentence, strike the sentence following the colon to the end of the paragraph, beginning with “Nine water treatment facilities…”, and replace with “The SDCWA and its member agencies are studying options to increase treatment capacity to ensure that future water infrastructure needs in San Diego County are met.”
Public Facilities: Water Supply

Page 5.12-6, Section 5.12.2, Methods of Analysis

It is unclear as to who is implementing the objective listed at the bottom of the page. To clarify, the following changes are requested for insertion: "Objective: SDCWA, through cooperative relationships with its member agencies, will ensure a safe, sufficient, reliable, and cost-effective water supply for the San Diego region."

In addition, the following phrase should be inserted prior to the "Actions" heading, for clarification as to who is carrying out the listed Actions 1-7: "SANDAG will continue to support SDCWA as the regional water provider in its following actions." This should help the reader understand that SDCWA is the regional water agency responsible for implementing the list of actions under this section, not SANDAG. We request that the above changes be made in the final PEIR.

Impact Analysis

Page 5.12-9, Section 5.12.4, Impact Analysis

In the second paragraph, the following is offered as clarification to the discussion:

The Water Authority Regional Water Facilities Master Plan utilized the official SANDAG demographic forecast at the time of the Master Plan study - the Year 2020 Cities/County forecast. The Water Authority and SANDAG entered into a MOA in 1992 where the Water Authority "agrees to use SANDAG's most recent Regional Growth Forecast (RGF) for planning purposes." The MOA serves to ensure that there is "consistency between the plans, policies, and ordinances of the cities and County, and the plans and programs of the Water Authority." (See MOA Section 4.) The Water Authority utilizes the SANDAG RGF to develop demand projections to be used in its water supply and facility planning. The MOA ensures that the water demand projections for the San Diego region are linked with SANDAG's RGF and that water supply is a component of the overall growth management strategy and regional comprehensive planning efforts. The analysis included in this section of the PEIR is based upon the proposed RCP for which an official forecast has not been developed. Consistent with our MOA, when a new forecast is produced, the Water Authority will generate a revised water demand forecast and evaluate supplies. In the meantime, the Regional Water Facilities Master Plan is flexible enough to allow the sizing and timing of water facilities to be adjusted to meet the demand, whether it increases or decreases from the Year 2020 forecast number.

In light of the data presented above to correct the discussion of this paragraph, we request that this paragraph be revised to include the above statements and change the finding of significance to "not significant" in the final PEIR.
Page 5.12-13, Mitigation Measures

Mitigation Measure ServSys-1 should be revised to read, "Water, sewer/wastewater, and landfill providers shall periodically update master plans and to ensure adequate facilities are available once the to meet projected locations and intensities of growth are specified." Please revise in the final PEIR.

Summary of Impacts with Significance Conclusions

Page 5.12-14, in the first paragraph under this heading, the second sentence should be revised to read, "This represents a potentially significant impact that can be mitigated to below a level of significance through implementation of mitigation measures ServSys-1, ServSys-2, and ServSys-3." Please revise in the final PEIR.

Thank you for this opportunity to comment. Please retain the Water Authority on your mailing list to receive the final PEIR and any other information concerning this project. If you have any questions, please contact Ms. Kelley Gage at (858) 522-6763.

Sincerely,

[Signature]

Ken Weinberg
Director of Water Resources

LP/kg
Attachments

cc: Larry Purcell, Water Authority, Water Resources Department Manager
Dana Friehauf, Water Authority, Principal Water Resources Specialist
Richard Pyle, Water Authority, Principal Civil Engineer
Letter N  San Diego County Water Authority

N-1 This comment provides introductory remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

N-2 The Final EIR has been revised to include the groundwater discussion provided in the comment letter. The new text appears on page 5.9-9 of the Final EIR.

N-3 Each of the groundwater basins is subject to water rights laws. Water districts responsible for groundwater basins used for potable water are responsible for safe yield. Recharge opportunities are available, including predominately the use of reclaimed water and during wet years, excess available water can be used.

The Final EIR has been revised to reflect the change to Mitigation Measure Water-3. The revised mitigation measure is presented below. The new mitigation measure appears in Table 1.6-1 and on page 5.9-16.

| Water -3 | Future projects that use ground water are required to adhere to a “no net loss” of ground water resources strategy. Projects that deplete existing groundwater resources are required to incorporate ground water recharge or other types of safe yield strategies to maintain adequate groundwater table elevations. |

N-4 Mitigation Measure Water-3 has been revised in the Final EIR. Please see response to comment N-3.

N-5 The analysis pertaining to the impact of the RCP on NCCP planning efforts, such as the MSCP or MHCP is discussed on page 5.10-12 in the Draft EIR. The MSCP and MHCP do not afford coverage/protection to all of the identified rare or endangered plant and animal species in San Diego County. Additionally, not all areas of San Diego County are covered by an adopted NCCP.

N-6 The Final EIR has been revised to reflect the comment. The revised measure is provided below. The revised measure appears in Table 1.6-1 and on page 5.10-18 of the Final EIR.

| Bio-10 | Site and design future projects to avoid significant impacts to marine resources. Any unavoidable impacts to significant marine resources will be mitigated to below a level of significance in accordance with the requirements of... |
N-7 The Final EIR has been revised to reflect the language noted in the comment letter. Please see page 5.12-1 of the Final EIR for the new discussion characterizing water supply existing conditions.

N-8 The Final EIR has been revised to reflect the language noted in the comment letter. Please see page 5.12-3 of the Final EIR for the new discussion on water infrastructure.

N-9 The RCP includes eight pages of discussion on water supply, ranging from existing setting to existing plans and programs to key issues, setting the context for the policy objective and actions. Additionally, the Implementation chapter for the Revised Working Draft RCP (dated March 24, 2004), includes a table listing Strategic Initiatives for each chapter, and that table specifies lead agencies, other participants, and dates, listing the SDCWA as the regional water agency responsible for implementing the actions. The policy objective and actions will remain as currently presented in the RCP.

N-10 The Final EIR has been revised to note that implementation of the RCP could result in a potentially significant impact on water supply. From a CEQA perspective, a potentially significant is still considered significant. Please see page 5.12-9 of the Final EIR for the new water supply analysis. Implementation of mitigation measure ServSys-1, which requires SDCWA to update their Regional Water Facilities Master Plan with the new population forecast figures, would reduce this impact to below a level of significance. It should be noted that SDCWA, based upon their MOA with SANDAG would update their plan with the new population forecast.

N-11 The Final EIR has been revised to reflect changes to Mitigation Measure ServSys-1. The revised measure is provided below and appears in Table 1.6-1 and on page 5.12-13 of the Final EIR.

```
ServSys-1 Water, sewer/wastewater, and landfill providers shall update master plans and ensure adequate facilities are available to meet projected locations and intensities of growth.
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N-12 The Final EIR has been revised to indicate that the need for new or expanded water facilities is potentially significant. Previously, the impact was identified as significant. Please see page 5.12-14 of the Final EIR. From a CEQA perspective, a potentially significant impact is still considered significant.
Mitigation measures ServSys-3 and ServSys-4 were inadvertently reversed in the Draft EIR. This error has been corrected in the Final EIR.

This comment provides closing remark. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 11, 2004

Rob Rundle
Senior Regional Planner
SANDAG
401 B Street, #800
San Diego, CA 92101

SUBJECT: Regional Comprehensive Plan (RCP) Draft Program Environmental Impact Report (PEIR)

Dear Mr. Rundle:

Thank you for allowing San Diego LAFCO to provide comments on the above-referenced PEIR. As you know, LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization and any associated sphere of influence actions. Usually, LAFCO is a responsible agency for environmental review when jurisdictional changes and/or sphere of influence changes are proposed. However, the draft PEIR is a program-level assessment of the potential impacts of the RCP and requires no changes to local governmental organization. Therefore, LAFCO has no comments on the PEIR and it does not appear that San Diego LAFCO will be a responsible agency for environmental review.

Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409.

CameronLuckett
ROBERT BARRY
Local Government Analyst

RB:tl
The comment letter states that since the RCP does not propose changes to local government organization, LAFCO will not be a responsible agency for environmental review. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 13, 2004

SANDAG
Attn: Rob Rundle
401 B Street, Suite 800
San Diego CA 92101

Re: COMMENTS ON DRAFT PROGRAM EIR for the REGIONAL COMPREHENSIVE PLAN

SUMMARY

Two of the main purposes of the Proposed Project (RCP) are to limit sprawl within the region, and to limit cross-border commuting. The plan contains almost no supporting evidence to indicate that it would accomplish these and other stated purposes.

1. Legal Requirements. The Draft EIR does not meet the minimum requirements under CEQA for presenting analysis and substantial evidence, but instead jumps to conclusions that are not warranted.

2. Growth Promotion. The RCP is a departure from previous SANDAG efforts, which centered on accommodating growth that was believed to be inevitable. This new plan seeks to actively promote a very substantial increase in housing units and residents. It aims to add 46,000 housing units and 100,640 more residents, which is roughly equivalent to the current population of El Cajon. These additions would be over and above existing plan capacities. This growth inducing component of the plan would be tremendously harmful to the quality of life in our region, and should be deleted.

The DEIR is internally inconsistent. The report states that we can't reduce population growth, but contradicts this by showing that the No Project/Existing Plans alternative would result in 100,640 fewer people than the project.
3. \textbf{Won't prevent sprawl.} The RCP claims to support “smart growth”. The plan has fairly specific plans for additions to density, but no plan that would relocate growth from outlying areas of the San Diego region. The plan will not prevent sprawl, and cannot prevent sprawl without a mechanism to do this. The plan states that most of the developable vacant land in the region has already been developed, or is already planned for development. This contradicts the claims that the RCP could significantly alter sprawling land use patterns in our region.

4. \textbf{Won't reduce the “exporting” of new homes to adjacent regions.} Taking Riverside County as an example, people buy or lease homes there to get a larger home on a larger lot than they could buy for the same price in San Diego County. Nothing in the RCP would reverse this trend. There is also an implicit assumption that the policy would be completely effective, so that 46,000 more homes added to the San Diego region would result in 46,000 fewer homes in adjacent regions. This assumption is not substantiated. See the detailed comments in paragraph 4 below explaining why this key part of the RCP cannot work.

5. \textbf{Transportation.} Claims that congestion will be lower in the future are not supported by facts and are not credible. Traffic congestion has been increasing in every major metro area in the U.S. where population has been burgeoning, even in urban areas with large expenditures on transportation, and even with “smart growth” programs.

6. \textbf{Industrial zoning.} One truly effective approach to lessen the growth in cross-border commuting would be to reduce the capacity for industrial growth in the northern and southern parts of the region. The RCP addresses this in a cursory manner only.

7. \textbf{Urban Growth Boundary.} The alternative of an Urban Growth Boundary was set up as a straw man—poorly constructed to shoot down easily.

8. \textbf{Economics and TDR's.} Sprawl cannot be prevented without addressing the economic forces that drive it. The DEIR ignores proven types of anti-sprawl measures such as Transfer of Development Rights.

9. \textbf{Comparison of Impacts.} The numerical scoring of the Project and the alternative was done in an entirely subjective manner. Little attempt was made to support the scores with data. No attempt was made to estimate margins-of-error or confidence levels for the scores. In the end, the score totals are so close, and so likely to contain large margins of error, that they can't reasonably serve as a basis for selecting an Environmentally Superior Alternative.
10. **Misleading statements. Lack of plan-to-ground comparison.** The DEIR contains numerous statements that the existing plans will result in new development, with the implication that the Proposed Project is similar to the Existing Plans. This is terribly misleading, and appears to be an attempt to downplay the benefits of Existing Plans.

Furthermore, there is a nearly complete absence of plan-to-ground comparisons throughout the report, as required by CEQA.

11. **Impacts grossly understated.** The DEIR repeatedly asserts that impacts will be “mitigated to below a level of significance”. This claim was made for 33 of the 39 impacts listed. These assertions are not supported by the analysis for most of the impacts.

The RCP would result in an addition of 46,000 housing units and 100,640 residents. If it were possible to add over 100,000 people without significant unmitigated impacts, the quality of life would not be deteriorating every year in the San Diego region and other regions in California, as it has been according to most measurements.

12. **Infrastructure and public facilities.** The Executive Summary and main text seriously minimizes the additional infrastructure and public facilities required to serve the induced growth. Mitigation is based on levels of funding that are unlikely to be achieved.

13. **Induced development and secondary population growth.** The addition of 46,000 housing units and 100,640 residents would create the need for many types of additional private development and additional workers. The RCP would create the equivalent impact of a new city with 100,000 residents. It is erroneous for the DEIR to conclude that such an influx of people would have a “negligible effect on the region’s employment growth”.

14. **Habitat.** It is disturbing to read in the report that “there would be a direct loss of native habitat that supports rare, threatened or endangered species, and impacts to these resources would represent a significant and irreversible environmental change.”

15. **Water Resources and Biological Resources.** See addendum.

16. **Historical.** Consideration for historical resources is almost completely lacking in the report. Yet the pressure to add infill has already doomed historical buildings, in the City of San Diego and other jurisdictions.
17. Affordability. The emphasis on inducing the addition of 46,000 homes gives a false impression that more homes means less expensive homes. The focus on quantity diverts attention away from measures that might be effective in improving affordability. These include living wage ordinances and linkage fees charged to industry to fund affordable housing.

18. "No project/Existing Plans" is a very attractive alternative. Much preparation has gone into the region's 19 general plans, and the DEIR has presented no well-supported evidence that these plans need to be greatly altered in an attempt to meet certain poorly defined goals.

19. Regional Plan without Growth Inducement. Some of the goals in the RCP appear to be worthy, although the proposed methods are highly flawed. One element that is particularly harmful is the proposed addition of 46,000 more homes and 100,640 more residents.

The EIR should consider an alternative that retains positive elements of the RCP but eliminates the intentional goal of growth inducement. Many of the RCP's goals could be accomplished by relocating planned development from outlying areas of the region into Smart Growth Opportunity Areas. This is the rationale of responsible smart growth—redirecting rather than inducing growth.

End of Summary

DETAILED COMMENTS

1. PROJECT EIR REQUIREMENTS

The Program EIR must analyze the overall impacts that cannot effectively be analyzed later at the specific project level. CEQA law is based on the requirement that large-scale projects require honest and thorough evaluation at the program level. "Look before you leap" means analyzing whether the RCP project makes sense at all on a regional level, and to examine other methods that could accomplish the same goals with fewer harmful impacts.

The RCP is a major project by any rational measure, including a proposal to add 46,000 homes in the region by 2030, over and above the hundreds of thousands of homes already planned. This is a huge, sweeping proposal, with implications for increased traffic, air pollution, and loss of open space. It would also induce whole new waves of other development—including the commercial and institutional facilities needed to serve the 46,000 added homes & 100,640 additional residents, plus more homes for service workers.

This draft EIR fails miserably in meeting CEQA requirements.
2. CHANGE OF APPROACH FOR SANDAG—OPEN GROWTH PROMOTION
In the past, SANDAG reports have claimed that job growth and residential growth are inevitable or extremely difficult to reduce. The recent RCP draft breaks new ground with a different premise: employment growth is inevitable, but population growth is proportional to the number of new housing units authorized and built.

One of the main fallacies in this new approach is that many of the new residents attracted to the region by the added homes would not come because of primary job creation. That is, they would not be part of the supposedly inevitable employment growth that the plan seeks to accommodate. These residents include the following:
- Retirees
- People with home-based businesses not dependent on the local economy, e.g. travelling salespeople and consultants.
- Secondary industry employees, including service workers needed by the added residents. (These were acknowledged in the report)

The DEIR also states that “there are no effective ways to reduce population growth”. Yet the DEIR clearly states that the region’s population in 2030 would number 100,640 fewer people if the SANDAG board adopted the No Project/ Existing Plans alternative, compared to the Proposed Project. This is a glaring internal inconsistency in the report.

3. SPRAWL PREVENTION WITHIN THE SAN DIEGO REGION
The project does not, in truth, focus future growth away from rural areas of the San Diego region.

There is no documented evidence presented that adding density to certain areas reduces or prevents sprawl, in the absence of specific programs that preserve vacant lands, like UGB, rural downzoning, TDR, agricultural preserves, open space acquisition, etc.

Even if the Project were somehow to be effective in slowing sprawl, there is no evidence presented that the delay of a few years would justify the damaging impacts. For example, if nearly all vacant developable land in the region would be developed in 35 years with the project, compared to 30 years without the project, would the delay of 5 years in the region’s buildout justify the addition of 46,000 homes and 100,640 people?
There is ample evidence that the San Diego region missed its chance for sweeping changes to land use patterns. Most of the remaining vacant land in the incorporated cities is already subject to development agreements or other approved development plans. The RCP proposes to relocate new development from outlying areas, but the only jurisdiction in which this strategy could work would be the unincorporated county. The Hewlett, Irvine and Packard Foundations, major “smart growth” proponents, has stated that they will focus their anti-sprawl efforts on regions where sprawl has not progressed to the extent it has in the San Diego region.

The DEIR lacks a justification for including remaining rural areas like Ramona and Fallbrook as targets for added density.

4. EXPORTING HOUSING

One of the main purposes of the Project is to “reduce the number of housing units and residents that are expected to be ‘exported’ from the region ...” The plan is to add 46,000 homes to the San Diego region, over and above existing general plan capacities, to induce people to live in the San Diego region rather than adjacent regions.

There are several reasons why the “reduced exporting” policy cannot work, and why the DEIR’s conclusions are invalid:

4.1. Price differential. The main reason that San Diego County workers live in Riverside County and northern Mexico is because housing is less expensive there. Some of these people have commuting times less than or similar to the San Diego regional average. Some have longer commutes, but have decided that the benefits of a larger and/or less expensive home offset the longer commute.

If we add more housing in the San Diego region that has prices similar to existing homes, there will be little impact on people buying in Riverside. With land prices higher in San Diego County than in Riverside County, there is no feasible way to produce San Diego homes at Riverside prices.

4.2. Type of housing. “Compact” housing is touted as a means to lower the median price of housing. But attached housing and downsized detached housing doesn’t meet the needs of people who are currently locating to Riverside County, who are primarily seeking spacious detached homes.
4.3. **Attracting non-targeted residents.** As stated above under Growth Promotion, when planning additional housing units, planners do not have the ability to accommodate primary industry employees without also attracting other residents, including retirees, travelling consultants, etc.

4.4. **New employment centers.** There is no reason to believe that Riverside County and parts of northern Mexico will remain bedroom communities. Riverside County officials have stated their goal of creating new job centers in their county. As these centers are developed, many Riverside County residents will be able to work closer to home, rather than commuting to San Diego County. Also, as job opportunities grow in Riverside County, housing prices will rise to a level closer to San Diego prices, which will alleviate the attraction for San Diego workers to live in Riverside. So there are two trends in process that will tend to slow down the “exporting” of homes, and these trends do not depend on the San Diego region inducing the addition of 46,000 homes.

4.5. **Complete effectiveness.** The DEIR relies on an assumption that the policy would be completely effective, with a one-to-one success rate, so that 46,000 more homes added to the San Diego region would result in 46,000 fewer homes in adjacent regions. However, no planning policy is completely effective. In analyzing alternatives, the DEIR acknowledges the many limitations on government’s ability to change people’s lifestyles. Yet the report does not address this basic question: How many housing units would have to be added to the San Diego region to eliminate the need for 46,000 households to locate in other regions and commute to jobs in San Diego County? If the ratio is 4-to-1, for example, then 184,000 units would have to be added to the San Diego region to get the desired effect.

To reduce cross-regional commuting, the simplest, most direct way, and perhaps the only way, is to allow fewer industrial parks in the north and south areas of the San Diego region. SANDAG’s transportation studies show that the majority of cross-regional commuters go to job sites in the northern and southern parts of San Diego county. (see Industrial section below)

To summarize, the strategy of “reduced exporting of homes” is a cornerstone of the RCP project, but is poorly supported by evidence in the DEIR. There are several obvious reasons why the strategy is not needed, and would work in a very limited manner, if it worked at all.
5. TRANSPORTATION

The "regional transportation corridors" that the project targets for additional housing are generally operating at low Levels of Service (LOS), with heavy traffic congestion. So clearly the authors cannot justify the project by claiming that existing transportation systems have excess capacity that should be utilized. Instead, they base their entire plan on the region's ability to massively improve transportation along the existing corridors, while also adding a few new corridors.

There is considerable doubt that taxpayers will approve the massive expenditures assumed by this DEIR. Even if the targeted funds were raised, there is little evidence that traffic could be improved compared to current levels. If transportation cannot be greatly improved along the targeted corridors, the whole rational for the plan is undermined.

It is unrealistic to assume an increase in transit ridership to the extent predicted by SANDAG planners. From 2000 to 2003, total ridership of the Metropolitan Transit System decreased by 3%. The system reportedly faces a budget shortfall of up to $6.3 million for the fiscal year beginning July 1, 2004. Transit ridership in other metro areas like San Francisco and Portland has not met expectations, and has not increased in proportion to the huge investments made.

The claim in the DEIR that traffic LOS will be improved on many freeways and arterials from LOS F to E is not supported by facts. In truth, congestion has been increasing in the San Diego region and in every large metro area in the nation, including those with above-average investment. There is no urbanized area in America where traffic congestion has been reduced during a period when population has increased by one million people. Every previous traffic study by SANDAG has showed deteriorating traffic conditions in spite of heavy outlays for improvements. The current plans contain an abrupt change in the claims of lower future congestion, apparently to attract support for $42 billion in new expenditures, but there is no concrete evidence to substantiate the claims.

It may not be politically popular to promote an expensive transportation plan that only slows down the rate in traffic deterioration, but the EIR process is required to present the truth.
6. VIABLE ALTERNATIVE—REDUCED INDUSTRIAL CAPACITY

SANDAG figures show that there is a large imbalance between remaining industrial capacity and remaining residential capacity. It is totally irrational to consider a massive program to add housing units without considering the alternative of reducing industrial capacity. This can be done in three ways:

- Downzoning of industrial land
- Acquisition of industrial land for open space or needed government facilities.
- Rezoning some industrial land to residential use.

If the reduction in industrial capacity is made primarily in the northern and southern part of the region, an added benefit would be to reduce cross-border commuting. Previous SANDAG transportation reports show that residents of Riverside County who commute to the San Diego region primarily go to job locations in North County. A similar relationship has been shown for the southern portion of the county.

In addition to the above approaches to deal with total industrial capacity, other approaches could be taken to control unsustainable rates of industrial growth. The RCP incorporates the Regional Economic Prosperity Strategy. This strategy calls for a wide array of growth inducing measures:

- Fuel the “engines of the local economy”
- “Foster growth in the region’s emerging and high technology industries”
- “SANDAG is developing policy recommendations on ways to increase the supply of readily available employment land”
- Provide radioactive waste sites to accommodate certain industries

One obvious alternative that was omitted in the DEIR is to refrain from any of the above policies that would stimulate increased rates of industrial development. It is absurd for the DEIR to state that employment growth can’t be slowed when the RCP is replete with policies to “foster growth”, and “attract industries”.

The DEIR cites a previous study, Growth Slowing Policies, and repeats the assertion that employment growth is not changed in any amount when industrial building is curtailed. This study was publicly derided in 2001, was criticized by several SANDAG board members, and never adopted. So it is highly improper to cite the study in the current DEIR.

The region has approximately twice as much industrial capacity as residential capacity, based on current land use plans. It is completely irrational to address this imbalance through the housing
side only. The Reduced Economic Growth Alternative was not analyzed adequately.

7. URBAN GROWTH BOUNDARY ALTERNATIVE

This alternative was not defined in such a way as to offer a meaningful option. The potential benefits of restricting growth in areas outside the SDCWA area was offset by “dispersing” the additional units within the SDCWA boundary. With all the demonstrated success of Urban Growth Boundaries in reducing sprawl, such as in Oregon, this alternative should not be set up as a straw man with unneeded hindrances. It is especially galling to see the DEIR’s Comparison of Impacts table rate the Urban Growth Boundary as having greater impacts than all alternatives, including No Project/Existing Plans. This conclusion is unsupported.

Three scenarios related to Urban Growth Boundaries would offer promising alternatives to the Project:

1. Boundaries drawn with more care than the DEIR, which assumed that the CWA line was a good boundary. Using the CWA line as a boundary is obviously insufficient, since it leaves out areas near Fallbrook, Ramona and many other locations that could be preserved with growth boundaries.

2. The DEIR’s analysis made an assumption that little new development would take place east of the CWA line under existing plans. However, when considering the powerful forces across the nation to convert agricultural land and other rural land to development, it is unwarranted to assume this.

3. If the RCP’s authors are so enamored with inducing growth that they can’t resist the urge, and are wedded to the CWA line as a boundary, then they should add a meaningful alternative: To contain future development within the SDCWA area, and to locate additional “captured” units in Smart Growth Opportunity Areas (SGOA).

8. ECONOMICALLY BASED ALTERNATIVES INCLUDING TDR

An alternative that that could actually stop sprawl was not included. This is the creation of a large scale Transfer of Development Rights program, with transfers taking place within jurisdictions and between jurisdictions. This type of program deals directly with a very powerful economic reality: That upzoning in urban areas creates windfall profits, while downzoning and conservation easements in rural areas can decrease the value of the land. Programs that do not deal with these economic realities cannot succeed in preventing sprawl.
9. COMPARISON OF IMPACTS

The overall conclusion of the DEIR was that the Proposed Project and the SGOA Reduced Intensity Alternative were the Environmentally Superior Alternatives. This conclusion is central to the Project, but is unfounded.

First of all, the individual item scores are highly subjective. For example, the report shows that added density increases local traffic and accompanying air pollution, but makes a weak case that this air pollution is offset by less traffic in outlying areas. A proper analysis could very likely show that No Project alternative would have less impact on air quality than the Proposed Project.

Secondly, there was no attempt to estimate margins-of-error or confidence levels in the individual scores or in the totals. Lastly, the total scores, which ranging from 39 to 42 except for one, are not differentiated enough to form a reasonable basis for choosing the project as the Environmentally Superior Alternative.

The addition of tens of thousands of homes and the accompanying population would have huge impacts on the region’s quality of life, and no rational decision maker would embark upon such a program because the Proposed Project scored 39 and the No Project scored 41.

10. MISLEADING STATEMENTS ABOUT IMPACTS

The DEIR contains misleading conclusions about the Project and the alternatives. These violate CEQA requirements to present alternatives in an unbiased manner.

There are several instances in which the DEIR confuses a “plan-to-plan” comparison with a “plan-to-ground” comparison, and implies that the Proposed Project has similar amounts of growth and impacts as the No Project alternative. In the main text and in Table 1.6-1, the report makes repeated claims that the No Project alternative contains development that “would still be possible” and “could still occur”. This diverts attention from the fact, acknowledged in other sections, that “the amount of development and the increase in population under the RCP is anticipated to be greater than under existing plans”.

FOSO Comments, DEIR for RCP, page 11
11. IMPACTS GROSSLY UNDERSTATE

The DEIR repeatedly asserts that impacts will be “mitigated to below a level of significance”. This claim was made for 33 of the 39 impacts listed. These assertions are not supported by the analysis for most of the impacts.

At an overall level, are we to believe that the RCP can add 46,000 housing units and 100,640 residents with few significant unmitigated impacts? This added population would mean an 11.4% increase above the forecast growth in population from 2004 to 2030, which is certainly a major addition (100,640/882,097 = 11.4%).

If it were possible to add over 100,000 people without significant unmitigated impacts, the quality of life would not be deteriorating every year in the San Diego region and other regions in California, as it has been according to most measurements.

12. INFRASTRUCTURE and PUBLIC FACILITIES

Previous SANDAG reports show that each new housing unit adds $12,000 of unfunded infra needs. Commercial and industrial development has also been shown to create unfunded regional needs. SANDAG reports also show a huge disparity in local impact fees. This leads to the conclusion that each new unit of development approved puts the region further behind in local and regional infrastructure and public facilities.

The RCP does not contain a funding mechanism, such as regional impact fees or model fees for local impacts. Without an identified funding source, the
mitigation in the DEIR is speculative, or even unlikely, making the mitigation conclusions invalid.

The DEIR should address the hugely undesirable impacts that would result if jurisdictions jumped on board with the increased density, but the funds were not forthcoming to pay for all the added local and regional needs. A mechanism is needed to halt added development if infrastructure cannot be provided concurrently.

13. INDUCED DEVELOPMENT and SECONDARY POPULATION GROWTH.
The addition of 46,000 housing units and 100,640 residents would create the need for many types of additional private development and additional workers. The additional development would include retail stores, distribution centers, doctor’s offices, churches, hospitals, etc. The additional workers would include store clerks, truck drivers, medical personnel, accountants, auto mechanics, gardeners, child care providers, and many other kinds of workers. The DEIR misleadingly refers to induced “service employment” when the actual inducement is to a broader array of workers.

Spreading the increase over a large area does not change the overall impact. We must consider that the RCP would create the equivalent impact of a new city with 100,000 residents. It is erroneous for the DEIR to conclude that such an influx of people would have a “negligible effect on the region’s employment growth”.

14. HABITAT
It is disturbing to see the conclusion: “Future development projects associated with the RCP would result in a direct loss of native habitat that supports rare, threatened or endangered species, and impacts to these resources would represent a significant and irreversible environmental change.” In spite of this, the comparison of impacts leaps to the unsupportable conclusion that the Project, with it’s 100,640 more people, would lead to less impacts that the Existing Plans.

Thomas G. Mullaney, President
Friends of San Diego

END OF MAIN COMMENTS. See addendum also.
ADDENDUM TO COMMENTS
from Friends of San Diego regarding the Draft EIR for the RCP

OTHER CEQA CONSIDERATIONS regarding impacts and mitigation

Vacant land to be used. It is misleading to state that implementation of the RCP would be accompanied by “some conversion of undeveloped land to urbanized uses.” A careful reading of the draft RCP (Dec. 2003) reveals that there is no mechanism contained in the RCP that would result in any permanent decrease in development of vacant land. So it’s misleading to imply that the RCP will reduce consumption of land except for “some” amount. The San Diego region has been losing 4677 acres per year of vacant land due to development, according to SANDAG figures. There is no approach specified in the RCP that has a demonstrated ability to stop this trend.

Infrastructure & public facilities. Similarly, the draft EIR seriously minimizes the additional infrastructure and public facilities required to serve induced development. The summary states “The placement of additional housing units in established areas may require upgrading and resizing of existing infrastructure, including water facilities.” A more accurate statement would be to admit that most of the existing urban areas are deficient in infrastructure and public facilities, so that added housing units would create a need for all types of local facilities (streets, roads, transit, schools, parks, water and sewer systems, police and fire stations), and regional facilities (regional transportation system, water supply and sewer treatment systems, regional parks, court and jail facilities.)

Energy. There is a conclusion that non-renewable energy resources are is less than significant. This is poorly supported by analyses. A thorough compilation would likely find significant energy impacts if it included the energy required for the following:
- Grading for 46,000 added housing units.
- Construction of 46,000 homes, including the production and transportation of materials, the building of the homes, and the energy consumed by the additional construction workforce.
- The ongoing energy needs of 100,640 added residents, which is about 3% of the current regional population.

Land Use. The DEIR cannot merely “explain away” the conflicts between the RCP and the 19 local general plans, the LCP, and the Port Master Plan. SANDAG doesn’t have the authority to impose land use controls on the local
jurisdictions, and it's far from certain that the jurisdictions will cede this authority to SANDAG.

The statement is made that "implementation of the RCP would reduce the amount of land used to accommodate the same population levels." This conclusion is unsupported. There has been no attempt made to quantify the amount of land to be consumed by the proposed 46,000 units, the accompanying infrastructure and the added housing needed for the service workers attracted by the 100,640 new residents. And no attempt to quantify the vacant land to be preserved with the RCP.

Components of growth and "our kids". It is highly inaccurate to state that "From a regional perspective, population growth is generated from births and immigration". In reality, population growth is due to the combined interaction of births, deaths, domestic in-migration and out-migration, and foreign immigration and emigration.

It is also incorrect to state that "This increase in population cannot be legally controlled by government agencies". The draft EIR clearly states that the region's population will be 100,640 lower in 2030 if the region does not implement the RCP. So the DEIR's authors apparently do believe that increases in population can be affected by local agencies.

It is especially outrageous to state that a majority of the people here in 20 or 30 years will be our children and grandchildren. As in other parts of the nation, there is a tremendous flow of people into and out of the region. Census and IRS data show that about 6.6% of a typical region's population moves out every year. In the San Diego region, it is possible to calculate that about four times as many people move here as are born here each year. (6.7% vs 1.67%.) A simple exponential calculation, using an out-migration of 6.7% per year, shows that a person born in San Diego this year has only a 30% chance of still being here in 20 years. The percentage is even smaller if we consider the tendency of young families to relocate more often than older people.

Visual. It is false to conclude that visual impacts with the No Project alternative would be comparable with the RCP, simply because "development along identified and eligible scenic highway corridors would still be possible under existing plans." This statement ignores the reality that the Proposed Project, the RCP, would intentionally and definitely add thousands of housing units along highway corridors, which is far different from the possible addition of some housing units in these locations under existing plans.
Transportation. It is misleading to conclude that under the No Project alternative “the impact might be less than the Proposed Project in some localized areas due to the lower planned density of development”. In reality, nearly all areas with added densities under the Proposed Project are likely to have more traffic than the same areas under the No Project/Existing Plans alternative.

There are well-documented relationships between increased density, increased traffic congestion, lower average speeds, and increased air pollution. So two conclusions are not supported by analysis:

1. “Future development could still occur under existing adopted land use plans, which could result in traffic increases and hot spots.” As with visual impacts, there would be a huge difference in traffic impacts between the addition of 46,000 units under the Proposed Project, as compared with the baseline of No Project, which by definition would not add 46,000 housing units to existing plans.

2. It is not valid and not credible to conclude that “After mitigation, impacts from the RCP and the existing adopted land use plans would be about the same”. For this statement to be true, the RCP would have to have such a remarkable affect on improved transportation plan that 332,000 ADT could be absorbed without unmitigated impacts. (Based on 46,000 added housing units at 7 ADT each). No evidence for such sweeping results is presented.

Noise. Regarding noise impacts, there is a misleading conclusion that “future development could still occur under existing adopted land use plans.” The fact is that the Proposed Project aims to increase housing stock by 46,000 homes over and above the number of housing units designated in existing plans.

So it is completely irrelevant to repeat the statement that both the Proposed Project and the Existing Plans include “future development that could occur”. In a plan-to-plan comparison, the EIR must deal with the sizeable impacts of adding 46,000 housing units, and must not confuse this with the impacts from existing plans alone, which should be analyzed as part of the plan-to-ground comparison. The misleading comments could unfairly bias a decision maker against the No Project/Existing Plans alternative.

With the proposed addition of 46,000 housing units and $42 billion of transportation improvements, and the concentration of these in limited areas, it is very doubtful that noise impacts can be mitigated to below a level of significance.
Biological Resources. The DEIR acknowledges the significant impacts from adopted plans, without analyzing the added impacts from 46,000 homes in the Proposed Project. The conclusion that biological resources impacts would be mitigated to below a level of significance is not supported by the analysis. 46,000 added housing units would generate about 322,000 ADT (at 7 ADT per unit). Additional land would be needed for the housing units, for the extensive transportation infrastructure needed, and for the additional parks, schools, libraries, police & fire facilities required for 100,640 more people.

Energy. The DEIR states that energy consumption will increase under the Proposed Project, but that “Energy consumption would be less... with the RCP... when compared with existing general plans”. The DEIR has not substantiated how a population increase of 100,640 people with the Proposed Project would result in lower energy consumption than the No Project alternative.

Hydrology/ Water Resources. The DEIR states that “Because the amount of development and the increase in population under the RCP is anticipated to be greater than under existing plans, the demand for groundwater resources may be greater than what would occur under the existing adopted land use plans.” This appears to be a logical conclusion.

However, the proposed mitigation measure is absurd. “Future developments that depleted existing ground water resources would require ground water recharge programs to maintain adequate ground water table elevations”. In essence, this means that the region can pump water out of aquifers at an unsustainable rate, but that another source of water can be found to add an equal amount of water to the aquifer.

Water and wastewater. The report states: “Water, sewer/ wastewater and landfill providers shall update their master plans and ensure adequate facilities are available once their location and intensities of growth are specified.” This is a circular approach to mitigation, and not a valid mitigation measure. A mere statement about the need for ensuring adequate facilities is not equivalent to a plan for providing them.

Little substantiation is provided to indicate that long term water supplies are ensured for an additional population of 100,640 induced by the Project.

Open space. The RCP lacks a comprehensive open space plan, and the DEIR does not adequately cover the loss of open space, both plan-to-plan and plan-to-ground. This is a serious shortcoming.

End of Addendum
The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

This comment states that the Draft EIR does not meet the minimum requirements under CEQA. Please see response below to comment P-2.

It should be noted that implementation of the RCP could result in the addition of 46,000 units with a corresponding population increase of 130,640 people (not 100,640 as indicated in the comment). The number 100,640 was a typographical error that appeared on Table 5.2-3 of the Draft EIR. The population increase is calculated by assuming 2.84 persons per housing unit. Therefore, 46,000 units would equate to a 130,640 population increase.

SANDAG has reviewed the growth trends and modeled growth projections (jobs, housing and population). Based upon this modeling effort, it is projected that population growth of 1 million people will occur within the region. Local land use plans would not prevent this growth from occurring. The modeling has identified a deficit of approximately 93,000 homes that cannot be accommodated in the region due to insufficient capacity identified in existing land use plans. It is not a goal of the RCP to encourage additional units in this region unless the other issues in the RCP can be implemented which would facilitate the assimilation of growth in the region that is sustainable. Implementation of the proposed project could result in additional units/people in the region; however the RCP also would facilitate the implementation of transportation, habitat, and other infrastructure-related changes that would partially mitigate the impacts of the additional units/people. Other impacts that remain significant are addressed and identified throughout the RCP EIR.

The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project. Additionally, please see response to comment P-4.

The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project. Additionally, please see response to comment P-4.
CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project. Additionally, please see response to comment P-5.

P-1e  This comment states that the EIR does not adequately support the analysis that the levels of service on the regional transportation network would be improved. Traffic impacts were addressed in Section 5.4 of the EIR. The analysis concluded that implementation of the RCP would result in a reduction in regional congestion levels, but would result in an increase in localized traffic impacts. The traffic analysis was based upon modeling prepared by SANDAG for the 2030 RTP. For modeling assumptions, please see response to comment P-6.

P-1f  State CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives to the project. Pursuant to Section 15126.6(c) the range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The commenter is proposing an alternative that would reduce the amount of industrial zoning in the northern and southern portions of the county as a method of reducing cross-border commuting.

The EIR included a Reduced Economic Growth alternative that was developed based on a similar concept. This alternative would restrict the amount of employment space available in the region, resulting in a reduction in the number of jobs that locate in the region. This alternative was rejected from further consideration in the EIR. Please see page 6-3 of the Final EIR. Also, please see response to comment P-7.

P-1g  This comment addresses the Urban Growth Boundary alternative analyzed in the EIR. Please see response to comment P-8.

P-1h  This comment raises Transfer of Development Rights and a method for reducing sprawl by addressing economic issues. Please see response to comment P-9.

P-1i  Please see response to comment P-10.

P-1j  Please see response to comment P-11.

P-1k  Please see response to comment P-12.

P-1l  Please see response to comment P-13.

P-1m  Please see response to comment P-14. Additionally, it should be noted that implementation of the RCP could result in the addition of 46,000 units with a
corresponding population increase of 130,640 people (not 100,640 as indicated in
the comment). The number 100,640 was a typographical error that appeared on
Table 5.2-3 of the Draft EIR. The population increase is calculated by assuming
2.84 persons per housing unit. Therefore, 46,000 units would equate to a 130,640
population increase.

P-1n Please see response to comment P-15.

P-1o Please see response to comments P-29 and P-31.

P-1p Section 5.11 of the EIR analyzed the impact to historical resources. The analysis
concluded that implementation of the RCP would result in significant and
unmitigated impacts to historical resources. Mitigation measures were provided in
Section 5.11.5 to partially reduce the impacts to historical resources; however,
these measures would not reduce the impact to below a level of significance.

P-1q This comment suggests policies such as including living wage ordinances and
linkage fees charged to industry to fund affordable housing. The comment raises
an issue about the proposed RCP, not about the environmental information or
conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires
that a lead agency prepare responses to those comments that address
environmental issues. Since this comment does not address an environmental
issue, no response is required. The comment will be forwarded to the decision
makers for their consideration prior to considering the Proposed Project.

P-1r The No Project/Existing Plans alternative was addressed in Section 6.2.1 of the
EIR. The SANDAG board will consider the proposed project and alternatives,
including the No Project/Existing Plans Alternative when taking action on the
EIR and RCP.

The comment states that “the DEIR has presented no well-supported evidence that
these plans need to be greatly altered in an attempt to meet certain poorly defined
goals”. Development under the existing plans will not accommodate the
population increase that is expected to occur between now and 2030. Specifically,
the region’s demand for housing units will exceed supply by approximately
93,000 units if development continues according to the adopted plans. Regarding
the statement of “poorly defined goals,” Table 3.5-1 of the EIR clearly identifies
the goals, policy objectives, and actions associated with the RCP.

P-1s This comment states that the proposed methods in the RCP are highly flawed, and
suggests that the plan did not consider growth inducement. The EIR addressed the
growth inducing impacts of the RCP, and determined that there would be
significant growth inducing impacts (Section 8.1). The EIR, on page 5.2-5,
analyzed whether implementation of the RCP would result in a significant
increase in employment. The EIR concluded that the impact would be less than
significant.
This comment states that the EIR should have considered an alternative that retains the positive elements of the RCP, but does not accommodate additional housing units. An alternative that presents this scenario would not meet the project objectives. Specifically, it would not identify a preferred approach for regional growth that will allow the region to improve the quality of life through a reduction of some of the approximately 93,000 housing units that are expected to be exported from the region by 2030.

The EIR meets the requirements of CEQA. The EIR is a program level document, and analyzes the impacts of the Proposed Project in proportion to the level of specificity available. At this time, the identification of potential Smart Growth Opportunity Areas (SGOA) has focused on a regional-level analysis. If the SANDAG Board approves the plan, further analysis will be done, to refine the locations of the SG0As, and additional environmental review will occur as local jurisdictions amend their land use plans to take into consideration localized conditions, environmental constraints, and other factors. State CEQA Guidelines Section 15146 states:

“The degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.”

Thus, the analysis presented in the EIR addressed the impacts to the extent feasible.

This comment misrepresents the main purpose of the RCP, suggesting that it is to recapture 46,000 housing units that would be constructed in southern Riverside County without a change in the general plans of jurisdictions within the San Diego region. To arrive at this conclusion, the author overlooked the logic behind the RCP and its quality of life objectives which are outlined in the EIR Project Description (EIR Chapter 3).

The forecasting process behind the RCP uses land use information (land use elements of General Plans) from each of the 19 jurisdictions to help determine the capacity for growth in the region. Using the land use elements of general plans provides the basis of one scenario of capacity and the guidelines for spatial distribution of growth (i.e. population, housing units, employment, etc.). In turn, this base case scenario is used to estimate many impacts, including air quality and traffic congestion, that together make up the region’s quality of life.

The RCP analyzes this base case scenario and asks whether it can be improved upon using local government policy options. Improved upon, here, means improve the region’s quality of life, including better air quality, less traffic congestion, and preservation of open space 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 life (compared with the base case) is for jurisdictions in the region to implement “smart growth” land use policies. The author of the comment does not appear to believe that the “way” growth is planned for and implemented will affect the region’s quality of life; rather, in the author’s view, one more person and one more unit will lower the region’s quality of life and one less person and unit will improve the region’s quality of life. Public policies can influence the quality of life, and “how” and “where” growth occurs in the context of the RCP is more important than “how many.”

Many of our cities are engaged in smart growth practices today, including some of our “built out” cities. These and other smart growth areas in the region are changing how and where growth is occurring; by building housing and service employment in close proximity to each other and alternative public transportation; designed together to help improve the region’s quality of life, including reduced traffic congestion and improved air quality. The success of growth in these downtown and other communities is a testament to the popularity and willingness of existing and new residents of the region to embrace and support smart growth.

Smart growth planning improves the efficiency and effectiveness of the way we will utilize the resources, resulting in an improved quality of life. In other words, if the 46,000 housing units were located in Riverside, our quality of life, including air pollution and traffic congestion, would be worse, than if the units and people were located in the San Diego region in smart growth communities.

The RCP is a policy document which responds to the anticipated economic and demographic growth in the region. The 46,000 units that are identified in the EIR are used only for analytical purposes. There is no stated goal in the RCP with calls for an additional 46,000 housing units. Rather, the RCP recognizes that the rate of population increase is exceeding the rate of housing unit increase between now and 2030.

This imbalance will result in the worsening of four trends we see in the region today: high housing costs, low vacancy rates, more persons per household (“doubling up”), and an increase in long-distance interregional commuting by the region’s employees who seek less expensive housing in Riverside County, Baja California, and even Imperial County. (RCP, P.21.)

In the past SANDAG has simulated the results of adopting policies that intentionally slow growth. In a report entitled An Analysis of Growth Slowing Policies for the San Diego Region (SANDAG, 2001), a scenario in which new housing was capped at 40 percent of what was forecasted to occur between 2000 and 2020 resulted in the loss of only eight percent of the forecasted population. However, it was found that most people affected by the housing shortage would
either double up or commute into the region from surrounding areas. This outcome resulted in overcrowding within households and greater congestion on our major transportation facilities, particularly I-15.

Housing costs in the San Diego Region probably will always be higher than the costs in the neighboring regions. However, we can affect the high cost of housing in the region by offering a different housing product, i.e., more single family attached housing, more apartments, etc. By offering more choices of housing type, we can let the consumers decide if they wish to substitute a less desirable housing type for a more desirable location (within the region). This is the type of choice that consumers make everyday. However, under current plans there is a paucity of choice in the market.

SANDAG has reviewed the growth trends and modeled growth projections (i.e. jobs, housing and population). Based upon this modeling effort, it is projected that population growth of 1 million people will occur within the region by 2030. This growth projection includes both in migration and native births. This growth is anticipated to occur without any intervention by SANDAG or any of the local jurisdictions. The modeling, taking into consideration the land use assumptions contained in existing adopted general plans, has identified a difference in supply versus expected demand of 93,000 homes that will be exported to surrounding regions if nothing is done. This export will occur if the local agencies implement the existing adopted General Plans. The EIR assumes that it is reasonable to cut the 93,000 homes deficit in half, for analysis purposes. As a result, the additional 46,000 homes discussed in the EIR as a goal to “capture” are not designed to induce population, but rather, to meet, partially, the demands of the projected growth for the region. In addition, the 46,000 units were used for EIR analysis purposes and is not a stated goal of the RCP. If the RCP is not implemented, the current trend of people living outside the area and commuting to San Diego to work would continue, thus creating more traffic congestion and air quality impacts, as well as a general decrease in the quality of life.

The intent of the RCP is not to encourage growth. The RCP is based upon and recognizes the Final 2030 population growth forecast which takes current plans into consideration, projects a rate of population increase that exceeds the rate of housing unit increase, resulting in four worsening trends: high housing costs, low vacancy rates, more persons per household, and increases in long-distance interregional commute.

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 is not the same thing as reducing population growth. 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 outcome of its
implementation is that some portion of those 93,000 households will not have to live outside the region.

Another factor to consider is that the general plans in San Diego County generally plan for the 2020 horizon year. The RCP assumes a 2030 horizon year. The intent of the RCP is not to encourage growth that is not going to already happen. At this time, with or without implementation of the RCP, the population will grow by approximately 130,000 people, the question is whether that population will have homes in proximity to their employment, or whether they will be living in outlying communities, commuting to San Diego employment centers, thus increasing impacts to various quality of life issues.

P-4 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

The additional 46,000 units used for analysis in the EIR, will be primarily focused in areas that are already developed, not into undeveloped areas on the fringe of existing development. Unincorporated communities, such as Ramona and Fallbrook were included as possible areas that could meet RCP smart growth principles. SANDAG has coordinated with the County of San Diego in the development of GP2020, the current update to the County’s general plan. The focus of GP 2020 is the development of county towns which concentrates development in already developed communities while reducing capacity for development in the outlying rural and semi-rural areas. Fallbrook and Ramona are two such county towns where increased development is targeted to reduce the pressure on other undeveloped areas in the county that are further from services. This concept is consistent with the goals and policy objectives in the RCP.

P-5 This comment identifies five reasons why reducing the export of housing will not work in San Diego. The comment raises an issue about policies/methodologies used in the RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to each of the five issues, as addressed below.

First, the comment misrepresents the main purpose of the RCP, suggesting that it is to recapture 46,000 housing units that would be constructed in southern Riverside County or Baja California without a change in the general plans of
jurisdictions within the San Diego region. This misrepresents the logic behind the RCP and its quality of life objectives.

The RCP analyzes a base case scenario (based upon land use elements of local jurisdictions’ land use plans) and asks whether the base case can be improved upon using standard local government policy options. Improved upon, here, means improve 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 life (compared with the base case) is for jurisdictions in the region to embrace and 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 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 forecast units could be supported in San Diego as a result of implementing the RCP. Where a specific number is necessary for analysis in this EIR to address the potential environmental effects (beneficial and adverse), the midpoint of this range is used (46,000 units).

**Price differential and type of housing product.**
The RCP is not attempting to provide comparably sized units in San Diego at Riverside prices. As stated in the comment, this is not reasonable given market characteristics and land prices in the two regions. The RCP does suggest a mechanism for providing greater housing choices for those wishing to reside within the San Diego region. Under current plans and policies, many of these people will be forced to reside outside of the region.

It is also true that some future residents will choose to live in Riverside rather than San Diego County in order to obtain a single family detached unit at a lower cost. This does not imply that all future residents will choose to do so. In fact, smart growth strategies currently being implemented in downtown San Diego (where dwelling units are being sold even before construction is completed) serves as an example of effective implementation of smart growth strategies. It is anticipated that implementation of the RCP’s smart growth strategies will serve to meet SANDAG’s stated goals of improving the quality of life for people living in the region.

**Attracting non-targeted residents.**
The EIR and RCP recognize that additional housing units require additional levels of population-supportive services. This is why the EIR includes an adjustment...
factor that takes into consideration the additional demand for population-serving industry.

**New employment centers.**
It is true that neighboring counties will, over time, develop new job and employment centers located outside of the San Diego region. However, this does not guarantee a reduction in the amount of interregional commuting, or suggest that housing prices will stabilize within the time frame of the RCP.

The San Francisco Bay Area and Silicon Valley have also experienced similar trends of outward migration of employment centers. As this occurred, “interregional” commuting in these areas did not decrease, and in many areas actually worsened. There are now heavily congested commuting corridors coming into and out of the more central locations of the greater Bay Area. Furthermore, housing prices in the desirable central locations have continued to increase over time, even while prices in the surrounding areas have also risen. This occurred because the central employment locations maintain their locational advantage in the greater region.

**Complete effectiveness.**
The overall goal and objective of the RCP is not to capture units/population that would be distributed throughout the area surrounding San Diego County without consideration of quality of life. The RCP encourages increase sustainability (water quality, energy, environment, transportation) and an increased quality of life for the community. One of the major concerns of the community is traffic. Traffic congestion has increased dramatically over the past decade at the U.S./Mexico border crossings, and along I-15 and I-5, much has been found to be associated with commuters traveling to their employment centers from outside of the San Diego region. Impacts to quality of life include increased travel times to/from work, increased energy consumption and air quality emissions, increased traffic congestion for local residents commuting to work/school site using the same circulation network. Thus, one of the concepts considered in the RCP would be ways to encourage people to live closer to their employment sites, reduce their reliance on single occupancy vehicles and improve their quality of life. The goal and objective of this RCP was not to capture all of those people who, for various reasons are, live outside San Diego County while working here.

The comment also suggests that a method to reduce cross-regional commuting is to allow fewer industrial parks in the northern and southern areas of the County. It is not in the region’s best interest to limit planned availability of industrial land. One important point in the Economic Prosperity chapter of the RCP is the relative importance of “traded cluster” employment to the region’s rate of growth in its standard of living. Jobs in these traded clusters, which represent about one-third of total employment, are primarily responsible for the growth in the region’s standard of living. The RCP recognizes the importance of these jobs to the region’s future prosperity, and the need to plan for their success, including
sufficient land for expansion and protection from non-compatible urban
carcroachment. The Employment Lands Inventory prepared by SANDAG, in
cooperation with the Regional EDC, showed that the region’s supply of
immediately available “industrial” land is in very short supply. Industrial land is
the type that has accommodated much of the employment in traded clusters. One
of the recommendations of the Employment Lands Inventory is to increase the
amount of immediately available employment land, not reduce it, in order to help
improve our standard of living.

P-6 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 2030 RTP includes more than $24 billion in capital
improvements to the regional transportation system (58% of the total plan),
including significant investments in transit facilities and services and
managed/high occupancy vehicle (HOV) facilities. These improvements are
projected to reduce transit and HOV travel times in major corridors compared to
drive alone travel times, and attract users to these multi-occupant travel modes. In
addition to capital improvements, implementation of the demand and systems
management strategies included in the 2030 RTP would improve LOS. These
include promotion of telework and intelligent transportation systems (ITS) that
would either eliminate a small percentage of motorized trips or reduce the number
of trips during the peak periods. Improvements in land uses, particularly focusing
higher density residential and employment development around transit nodes, also
contribute to improved efficiency of the regional transportation system.

P-7 State CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a
range of reasonable alternatives to the project. Pursuant to Section 15126.6(c) the
range of potential alternatives to the project shall include those that could feasibly
accomplish most of the basic objectives of the project and could avoid or
substantially lessen one or more of the significant effects. The commenter is
proposing a reduced industrial capacity alternative.

The comment misrepresents the logic behind the RCP and its quality of life
objectives. The RCP analyzes a base case scenario that is partly based on the land
use elements of the 19 jurisdiction’s general plans, and asks whether it can be
improved upon using standard local government policy options. Improved upon,
here, means improve the region’s quality of life, including better air quality and
less traffic congestion, above what is expected to occur in a base case scenario
(associated with current general plans).

The suggestions offered by the comment would worsen the quality of life in the
region not improve it.
The purpose of having industrial land capacity, as explained in the Regional Economic Prosperity Strategy (an element of the RCP) is related to improving the region’s standard of living, an important component of the region’s quality of life. In fact, SANDAG’s Employment Lands Inventory showed the region has a shortage of immediately available industrial land, not an oversupply. This shortage of industrial land may be a contributing factor to the recent trend of fewer new “high quality” job opportunities being created in the region, resulting in a lower quality of life for the region’s residents. The Regional Economic Prosperity Strategy also points out that these high quality, high value-added, jobs contribute least to the regions need for new workers at each level of production or output. Any strategy designed to minimize the need for new workers should be based upon industrial production, or what has become known as “traded employment clusters.”

A second suggestion offered that would result in a lower quality of life in this region is to reduce commuters into the county by reducing the amount of industrial land along our northern and southern borders. This suggestion would have little to no impact on commuters and fails to address why people choose to work in San Diego and live in Riverside or northern Baja. A portion of this choice is based on the preference for a single-family house purchased at a price that reflects a trade off between purchase price and commute time. However, other factors also affect where people live and work. More to the point, southern Riverside County and northern Baja have become part of the San Diego region’s housing market; just as the San Diego region is part of their job market. This phenomenon is prevalent in the Los Angeles and Bay areas as well as with in the San Diego region itself.

P-8 Pursuant to CEQA, the EIR describes a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. As well, the EIR examines the “No Project” alternative as required by CEQA. Alternatives specifically addressed include the following:

No Project/Existing Plans
Smart Growth Opportunity Areas – Reduced Intensity Alternative
Smart Growth Opportunity Areas – Increased Intensity Alternative
Urban Growth Boundary Alternative

According to CEQA section 15126.6(a) an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. As such, the Urban Growth Boundary Alternative was
included in the EIR based upon comments received during the NOP period. The SDCWA service boundary was selected as the demarcation line, because it represents the limit of water service availability in the County of San Diego. Areas beyond this line utilize groundwater, and therefore, extensive development beyond the SDCWA service territory line, including a marked increase in intensity, is not feasible. Therefore, from a planning perspective, this boundary was considered appropriate and reasonable to provide the public and decision makers with a reasonable range of alternatives.

P-9 Please see response to comment P-8 regarding SANDAG’s responsibilities to evaluate a reasonable range of alternatives. Implementation of a large-scale Transfer Development Rights program would be difficult from a cross jurisdictional standpoint. Implementation of a Transfer Development Rights program would still result in environmental impacts. If development identified for the County of San Diego was moved into the cities, there would be similar impacts to those identified in the RCP, since there would be a localized increase in land use intensity.

P-10 State CEQA Guidelines Section 15126.6(d) provides guidance on the evaluation of alternatives, including the statement that the alternatives are to be compared to the Proposed Project. Specifically, Section 15126.6(d) states:

“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”

Therefore, for comparison purposes SANDAG chose to assign a numerical value to the alternatives. Therefore, the Proposed Project was assigned a value of 3. Then, an alternative that had a slight benefit got a rating of 2, a greater benefit a rating of 1. Conversely, if an impact was negative, there were two available ratings to allow for comparison of the magnitude. It is fully recognized that from a CEQA perspective some of these impacts were significant (or less than significant) for all alternatives. However, from a comparison standpoint, some of the impacts were at a greater or lesser degree of magnitude compared to the Proposed Project. The total score on the table has been eliminated so as to not imply that all issue areas addressed in the matrix are of the same value to all readers of the EIR. The “rating” discussion provided additional information to give the decision makers meaningful evaluation for their consideration.

P-11 The EIR includes both a plan to ground and plan to plan analysis. This concept is introduced on page 5.1-15 of the Land Use section:

The land use impact analysis compares the future land use scenarios recommended in the RCP with the existing and planned land use scenarios under the adopted land use plans for the region. The analysis includes both
plan-to-ground and plan-to-plan analysis as dictated by the significance criteria. The plan-to-ground analysis considers the impacts of the RCP to the current environmental conditions that exist “on the ground” as of the Notice of Preparation (NOP) date for this project. The plan-to-plan analysis compares the RCP with the existing land use plans for the San Diego region.

Table 1.6-1 was specifically structured to include a comparison of the No Project/Existing Plan alternative. This comparison is not intended to minimize the impacts of the RCP, but rather to indicate that there will be additional growth in the region (even without implementation of the RCP), and that this growth will also result in environmental impacts. Pursuant to CEQA, the plan-to-ground analysis forms the basis for the significance conclusions in the EIR.

P-12 The commenter does not indicate which specific impact analysis area is of concern, or was not adequately analyzed. As noted by the comment, the EIR identified significant and unmitigated impacts due to implementation of the RCP in the areas of Land Use, Population/Housing/Employment, Transportation/Circulation, Energy, Biological Resources, and Cultural Resources. See Table 1.6-1 for a summary of the impacts, significance, and requirements for mitigation. Each mitigation measure was addressed to the level of specificity allowed for the project level analysis is Section 5.1 through 5.12 of the EIR. Pursuant to State CEQA Guidelines Section 15126, SANDAG is responsible for identifying feasible mitigation measures. Specifically, Section 15126.4 states:

“An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy”

Additionally, CEQA Guidelines Section 15091(a) states that a lead agency may make findings that changes or alterations in the project are within the responsibility and jurisdiction of another agency making the findings, and such changes can and should be adopted by such other agency.

“No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.”

The possible findings include, as noted in 15091(1)(a) and (b):

“Changes or alternative have been required in, or incorporated in, the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR, and such changes or alterations are within the responsibility and jurisdiction of another public agency and not
Therefore, the EIR had to identify feasible mitigation measures. In the event of land use inconsistencies, the feasible mitigation measure is that the underlying land use plan must be amended to eliminate the inconsistencies. If the plans are not modified, then no project could go forward. SANDAG will need to make Findings that these are the responsibility of another agency. If mitigation measures cannot be implemented (found infeasible at subsequent review), then the lead agency with land use authority will need to prepare a Statement of Overriding Considerations for any significant and unmitigated impacts.

P-13 The Integrated Regional Infrastructure Strategy (IRIS), an element of the RCP analyzes the eight most important infrastructure areas that affect the region’s quality of life. Given the resources available and recognizing that all 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. The IRIS also identified three infrastructure areas with insufficient operating and capital improvement budgets or strategies to acquire the resources needed, 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 get these three infrastructure areas funded at the same level as the other five infrastructure areas.

The IRIS also recognizes the need to provide all necessary infrastructure in a timely manner that reflects the completion of new development or redevelopment. 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 the transportation facility it is intended to serve. The RCP expects to use the transportation funds 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 of urban change and growth resulting in an improved quality of life in the region.

P-14 The EIR concluded that approximately 12,000 new jobs could be induced if there is an increase in population as a result of implementation of the RCP, which equates to a 0.7% increase. A threshold of 3% was established because the average annual growth rate of population and housing in San Diego County 1960 to 2000 was calculated at 2 percent, with a standard deviation of 1 percent. This increase in residential units and/or population is considered to be significant because it will lead to other indirect physical impacts discussed elsewhere in the EIR. Since the increase (0.7%) was less than the threshold (3%), the impact was determined to be less than significant, as noted on page 5.2-5 of the EIR.
P-15 The conclusion that implementation of the RCP would result in less impacts to native habitats than the existing plans is based upon the fact that the RCP emphasizes that future development be located along existing transportation corridors and in currently developed areas. This will, in turn, reduce the amount of development going to the rural areas of the County, which support native habitats, as well as those areas outside the County (i.e. southwest Riverside, Imperial, and Orange counties). The RCP supports the efforts of the County of San Diego in its general plan update process GP2020. This concept would focus population growth in the western areas of the county where infrastructure and services are more readily available. The plan update proposes to increase housing densities within the village limit line of various rural communities, but has reduced development densities in outlying backcountry areas.

P-16 SANDAG recognizes that vacant land will be developed under the implementation of either existing plans or the RCP. However, the goal of the RCP is to focus the increased land use intensity into vacant lands within already developed areas as well as in areas of redevelopment. Therefore, it is expected that most of these lands would already be developed, or, if vacant, surrounded by developed land and, most likely, not valuable from a habitat perspective. If the RCP is approved, SANDAG will coordinate with local jurisdictions to address local constraints and to further refine the location of the units within the SGOAs, at that time vacant lands can be quantified. Regardless of the implementation of the RCP, as noted on Table 5.1-1 of the EIR, there is expected to be an increase in 453,450 developed acres between 2000 and 2030 based upon buildout of the existing general plans. Also, please see response to comment P-15 above regarding the County of San Diego’s general plan update.

P-17 The EIR states that there are deficient park opportunities. Specifically, on page 5.12-14, the EIR states:

Since many of the areas designated for intensification are within currently urbanized areas, the RCP would create additional demand in areas where current park and recreation services are at a deficit, the provision of additional park space may be infeasible.

This statement also applies to local transportation network, water and sewer infrastructure, and police and fire protection services.

Until a further refinement occurs, and more detailed locations are identified for the 46,000 units used for EIR analysis purposes, a detail of deficiencies cannot occur. However, the comment misrepresents the main purpose of the RCP, suggesting that it is to recapture 46,000 housing units that would be constructed in southern Riverside County without a change in the general plans of jurisdictions within the San Diego region. To arrive at this conclusion, the author overlooked the purpose of the RCP and its quality of life objectives which are outlined in the EIR Project Description (EIR Chapter 3). The addition of any number of new
units cannot be assumed without the other elements that are the Regional Comprehensive Plan.

Mitigation measures are identified for new development projects with significant impacts in order to reduce the impact of that specific project, and that project’s contribution to cumulative impacts. New development is not required to remedy existing deficiencies.

P-18 The EIR concludes that implementation of the RCP would result in significant and unmitigated impacts to non-renewable energy resources. As noted on page 5.7-9 of the EIR:

Implementation of the RCP and associated regional growth during future developments would result in an increased amount of non-renewable energy consumption throughout the region. Even with the policy goals and objectives included as part of the RCP, energy consumption associated with regional growth would likely exceed 3 percent of non-renewable energy resources. Energy consumption with the RCP would be less than that required under the No Project/Existing General Plan alternative, but would still be significant and unmitigable.

With regard to the statement that the RCP would be less energy consumptive than the No Project/Existing Plans alternative, since goals of the RCP would increase the use of renewable resources, as well as improve the overall transportation network, fuel efficiency would be improved. Reduced fuel and energy consumption (compared to current plans) is also anticipated with implementation of the SGOAs with transit infrastructure in these areas. The RCP proposes to encourage higher use of transit, biking, walking, and reduced single occupant vehicle use.

P-19 The Land Use analysis in the EIR concluded that implementation of the RCP would result in inconsistencies with adopted land use plan, which in turn is a significant impact. The comment correctly states that SANDAG does not have land use authority. However, per CEQA, the lead agency must identify feasible mitigation. Please see response to comment P-12 for a summary of the State CEQA Guidelines Section 15126.4 and Section 15091, which address the identification of feasible mitigation, and the development of Findings which identify that implementation of the measure may be necessary by another jurisdiction.

P-20 The EIR cannot identify the location of an additional 46,000 units used for EIR analysis purposes because detailed level planning has not occurred. The EIR analyzes the project at a level proportionate to the specificity provided, in this case at a program level. At this time, the SGOA and select unincorporated communities are the target areas for the units. If the RCP is approved, SANDAG will coordinate with local jurisdictions to address local constraints and to refine
the location of the units within the SGOA. Since this further analysis has not occurred, it would have been speculative to guess where these units may be focused and the specific project level environmental impacts.

Pursuant to CEQA Guidelines Section 15145:

“If, after through investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impacts.”

Additionally, Section 15146 states:

“The degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.”

Finally, implementation of the RCP will also result in a decrease in the amount of land that would be developed outside the County. The capture of units that would normally be constructed in southwest Riverside, Orange and Imperial counties, and northern Baja would decrease the amount of land that would be developed in those areas.

P-21 The comment is correct and the text will be changed to reflect the fact that growth is the result of births and deaths (natural increase) and in-migration and out-migration (net migration), and that SANDAG’s forecasts take all of this into account.

P-22 The mitigation measure discussion regarding why population and housing impacts are unmitigable has been changed. The change was made to make Table 1.6-1 consistent with the discussion in Section 5.2.5 of the EIR. The revised mitigation measure is presented below:

There are no feasible or practicable mitigation measures to reduce the significant impacts. The physical effects of population and housing result in physical changes to the following issue areas: transportation/circulation, air quality, noise, biological resources, cultural resources, energy, and public service/utility system. The physical changes and mitigation measures for those indirect impacts are addressed in the applicable mitigation sections.

P-23 Demographers define two components to population change in an area: natural increase (local births minus local deaths), and net migration. About 2/3 of the 2000 to 2030 population increase will be the result of natural increase. By definition, that includes children born here to people who themselves were born...
here, as well as children born here to people who moved here 10 years ago, and those born here to people who will move here 10 years from now.

Please see response to comment P-21 regarding SANDAG’s population forecasting efforts.

P-24 The threshold used for the scenic corridor analysis was: would the proposed project degrade the appearance of, or from, State designated or eligible scenic highways (see Section 5.3.3 of the EIR)? The analysis concluded that the implementation of the RCP would result in a significant impact. Future development under the existing land use plans could also place development in locations that could degrade views along scenic corridors.

While the RCP could add more housing units along highway corridors compared to the No Project alternative, it is important to note that not all highway corridors in San Diego County are listed as designated or eligible scenic highways. Therefore, just because a development is located along a highway corridor, it is not necessarily going to result in a significant visual quality impact.

P-25 The EIR used the following threshold for the analysis of localized traffic: would the project generate traffic on local roadways, which degrades existing LOS D or better roadway and intersection conditions to LOS E or F in relation to the capacity of the local street system? Because the precise location of future development within the SGOA has not been identified, specific analysis of the localized street network was not conducted. However, the EIR concluded that implementation of the RCP would have significant transportation and circulation impacts on regional transportation systems and local streets due to increased density. The level of analysis is consistent with the level of detail, and is adequate for a program-level review. As noted in Section 5.4.6 of the Final EIR, localize traffic impacts are only partially mitigated by mitigation measure Trans-1. It is expected that some localized circulation networks would not be able to be improved to less than significant levels.

Finally, to state that all localized street networks will be impacted, as noted by the commenter, is speculative. Any localized impacts will be determined as subsequent environmental review, consistent with CEQA, including traffic analysis, is performed as individual development projects move forward.

P-26 This comment quotes statements from Table 1.6-1 in the EIR. This table provides a summary of impacts and proposed mitigation measures. This table also includes a brief statement regarding the impact if the No Project/Existing Plans alternative was adopted. This comparison is provided to briefly summarize the anticipated impacts in a plan-to-plan scenario. However, pursuant to CEQA, the plan-to-ground analysis forms the basis for the significance conclusions in the EIR.

The statement that “future development could occur under the existing adopted land use plans, which could result in traffic increases and hot spots” is correct.
Regardless of whether the RCP is approved or not, there will still be growth in the region consistent with the adopted plans. This growth will result in increased traffic congestion and hot spots. Mitigation for the hot spots (Trans-1) would be applicable for both the Proposed Project as well as the No Project alternative. However, since localized traffic impacts will be significant and unmitigated, the localized CO hot spots impacts will also remain significant and unmitigated after incorporation of the mitigation measures.

If additional housing is not constructed in San Diego and people continue to live in the outlying areas and commute to San Diego County for their jobs, people will be traveling longer distances on the regional transportation network, and this will likely result in greater traffic congestion and a corresponding increase in CO hot spots.

The summary of statements regarding visual resource impacts in Table 1.6-1 were included to briefly summarize the anticipated impact in a plan-to-plan scenario. However, pursuant to CEQA, the plan-to-ground analysis forms the basis for the significance conclusions in the EIR. Visual resource impacts under the No Project/Existing Plans alternative will generally be less impactive then the Proposed Project.

P-27 Implementation of the RCP will result in additional vehicle trips to the regional roadway network due to the development of additional housing. However, the location of that housing along major transportation corridors, near employment centers, and near transit hubs will increase the likelihood of future residents opting to take public transit, and walk and bike to various destinations. This will result in a proportionate decrease in the number of vehicles on the regional highways. The Regional Transportation Plan (MOBILITY 2030) relied on these smart growth assumptions, including population projections to develop the transportation network. The results of the RTP modeling indicate reduced vehicle miles traveled as compared to the No Project/Existing Plans alternative in that analysis. This is attributed in part to the reduction in interregional commuting.

P-28 Please see response to comment P-11 for a discussion of plan-to-plan vs. plan-to-ground analyses in the EIR. Pursuant to CEQA, the plan-to-ground analysis forms the basis for the significance conclusions in the EIR.

The noise analysis in the EIR (Section 5.6) considered noise impacts related to the construction of project associated with the RCP (residential/commercial and infrastructure) and operation. The analysis concluded there would be significant noise impacts; however, these impacts would be reduced to below a level of significance with implementation of mitigation measures Noise-1 through Noise-6.

P-29 The EIR analyzed impacts to biological resources in Section 5.10 of the EIR. The analysis addressed impacts associated with both the residential development
associated with the RCP, as well as impacts related to infrastructure. Direct and indirect impacts were analyzed. The analysis concluded that implementation of the RCP would result in significant impacts to biological resources. All impacts would be mitigated to below a level of significance with the mitigation measures presented in Section 5.10.5 with the exception of impacts to endangered species. This impact would remain unmitigated, even with the incorporation of mitigation measures.

P-30 Please see response to comment P-18. If additional housing is not constructed in San Diego and people continue to live in the outlying areas and commute to San Diego County for their jobs, people will be traveling longer distances on more congested regional transportation networks, thus resulting in decreased fuel efficiency. Energy consumption related to transportation accounts for over 50 percent of all energy consumed in the San Diego region according to the Regional Energy Plan for the San Diego region (SANDAG, 1994).

P-31 Each of the groundwater basins is subject to water rights laws. Water districts responsible for groundwater basins used for potable water are responsible for safe yield. Recharge opportunities are available, including predominately the use of reclaimed water and recharge during wet years.

The Final EIR has been revised to reflect the change to Mitigation Measure Water-3. The revised measure is presented below and appears in Table 1.6-1 and on page 5.9-16.

Water -3 Future projects that use groundwater are required to adhere to a “no net loss” of groundwater resources strategy. Projects that deplete existing groundwater resources are required to incorporate groundwater recharge or other types of safe yield strategies to maintain adequate groundwater table elevations.

P-32 By requiring service providers to periodically update their plans, these providers will be using the most accurate population projects and the location of those populations.

Based upon a comment received from the San Diego County Water Authority (SDCWA), mitigation measure ServSys-1 has been revised. The revised measure is presented below and appears in Table 1.6-1 and on page 5.12-13 of the Final EIR.

ServSys-1 Water, sewer/wastewater, and landfill providers shall update plans to ensure adequate facilities are available to meet projected locations and intensities of growth.
SDCWA (comment letter N), has indicated that there is adequate flexibility in their Regional Water Facilities Master Plan to accommodate the future growth anticipated with the RCP.

The RCP does not propose a stand-alone open space plan, but rather supports the existing open space preserve system established by the Natural Community Conservation Planning Act of 1991 (NCCP). This included coordination among USFWS, CDFG, and a variety of local jurisdictions. The primarily policy objective of the RCP with regard to natural habitats is: “Preserve and maintain natural biological communities and species native to the region.” Plan-to-ground impact analysis of Biological Resources is included in the EIR.
San Diego County Archaeological Society, Inc.

Environmental Review Committee

18 April 2004

To: Mr. Rob Rundle
Senior Regional Planner
San Diego Association of Governments
401 B Street, Suite 800
San Diego, California 92101

Subject: Draft Program Environmental Impact Report
Regional Comprehensive Plan for the San Diego Region

Dear Mr. Rundle:

I have reviewed the cultural resources aspects of the Draft Program EIR for the SANDAG Regional Comprehensive Plan (RCP) on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DPEIR, we have the following comments:

1. The treatment of cultural resources in the DPEIR is well done, and addresses the subject area in considerably greater detail that the RCP itself. We trust that the RCP is being improved in that respect.

2. Regarding Mitigation Measure Cult-1, the literature review, record search and field survey should be supplemented by a review of historic maps (Sanborn, topographic, etc.), and aerial photographs. The topographic maps and aerial photographs are available at the County's Cartographic Services counter at 5201 Ruffin Road in Kearney Mesa. Also, the mention of site capping as an approach to mitigation is appropriate, but should occur following indexing of the site, so that future researchers have reasonable knowledge of the resource that has been protected.

3. Mitigation Measure Cult-3 is particularly appreciated. There are two clarifications we would suggest here. The first is to add "and associated records" between ""artifacts" and ""in a regional center", because proper curation also requires copies of field notes, photographs, etc. The second comment is to clarify that "curation of all archaeological and/or historical artifacts and associated records" means exactly that: All material recovered from all phases of work, from the initial survey (which only rarely includes collection of any material), through testing, indexing, data recovery, and monitoring. It should also include any previously uncurated material from earlier projects the results of which form part of the new project's environmental analysis. For example, if a testing program took place on a site in a new project's APE for an earlier project that may not have gone forward, that previous collection should be located and curated along with the collections from the new project.
SDCAS appreciates this opportunity to participate in SANDAG’s environmental review process, and looks forward to doing so again during future public review periods.

Sincerely,

[Signature]
James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Kyle Consulting
SDCAS President
File
Q-1 This comment provides introductory remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

Q-2 The EIR is required to address the potential physical changes related to project implementation. Based upon the level of specificity, the EIR has concluded that effects would occur to cultural resources. The mitigation measures are presented in Section 5.11.5 of the Draft EIR.

It is the responsibility of the local land use agencies at the project implementation phase to incorporate these measures. The EIR has concluded that even with the incorporate of the mitigation measures identified in Section 5.11.5, impacts to cultural resources would remain significant and unmitigated.

Q-3 Mitigation Measure Cult-1 has been expanded to include review of historical maps. Additionally, language has been added to the measures requiring indexing of site proposed to be capped. This will ensure that future researchers have reasonable knowledge of the resources proposed to be capped. The revised mitigation measure is provided below, and appears in Table 1.6-1 and on page 5.11-10 of the Final EIR.

Cult-1 A review of literature and historic maps, a records search, and field survey to identify the presence or absence of cultural resources for each future development project shall be undertaken if the jurisdiction determines these studies are warranted. Prior to any development where possible impacts to significant cultural resources may occur, each cultural resource will need to be evaluated through testing programs to determine the significance/importance prior to determining mitigation of proposed impacts or providing recommendations for preservation. Historic resources may require analysis by a qualified historian or an architectural historian. Sites identified as significant/important will need to be avoided by development impacts or mitigated by completion of a data recovery program conducted in compliance with CEQA and agency guidelines. Site avoidance and preservation can include capping the site with gravel or construction fabric and 16 to 18 inches of sterile fill soil. Sites proposed for capping shall be indexed so future researchers have reasonable knowledge of the resources that have been protected. Capped sites can be landscaped with native, shallow rooted plants that are compatible with the surrounding biologic habitat. Passive uses for capped sites include trails, picnic and play areas, parking lots, and tennis or volleyball courts. A data recovery program for
archaeological sites consists of excavation of a percentage of the site (determined in consultation with the local agency) to provide information necessary to answer significant research questions.

Q-4 Mitigation Measures Cult-3 has been modified to include the phrase “and associated artifacts”, as requested in the comment. Additionally, the measure has been expanded to identify the artifacts for curation include materials from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. The revised mitigation measure is provided below, and appears in Table 1.6-1 and on page 5.11-11 of the Final EIR.

Cult-3 For future development project, lead agencies shall integrate curation of all archaeological and/or historical artifacts and associated records in a regional center focused on the care, management and use of archaeological collections. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. Curated materials shall be maintained with respect for cultures and available to future generations for research.

Q-5 SANDAG concurs with the intent that artifacts collected should be curated; however, it is not feasible to assure that all previous artifacts can be collected for curation. The property ownership may have changed, consultants who conducted previous reconnaissance/work may no longer be in business, and artifacts may have been donated to other entities.
May 13, 2004

VIA EMAIL to rru@sandag.org

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

Dear Mr. Rundle

Subject: Programmatic Environmental Impact Report for the Regional Comprehensive Plan (RCP) For the San Diego Region

The San Diego Chapter of the Sierra Club has been pleased to participate in the RCP on the Stakeholders’ Working Group and to respond to the PEIR for that project. We are strongly in support of the basic goals of the RCP which direct future development of the region in a manner that sustainably preserves open space and agricultural lands while using existing infrastructure including roads, highways, and public transit. However, the Sierra Club also recognizes that there are long-term limits to growth that have not been addressed in either the RCP or the PEIR. “Even if future growth is accommodated in the most environmentally sound manner, eventually population will exceed a level sustainable by available natural systems such as air, water, and energy.” (Sierra Club California Urban Growth Management Policy Guidelines) As a region, we need to determine the limits to growth in this region consistent with optimal living conditions.

The PEIR presents the project as an attempt to find housing for an extra 45,000 units or 130,640 persons not currently accommodated by existing plans for 2030. This approach to the project is confusing as it addresses only 13% of the total expected increase of 1 million persons. The basic project is designed to coordinate land use and transportation development throughout the region. The impacts should be based on the environmental impact of the estimated increase in population of 1 million with RCP applied compared to existing plans (plan to plan) and with RCP compared to existing conditions (plan to ground). Whether or not adoption of the RCP will attract an extra 45,000 or 21,000 units is not foreseeable, in my opinion, and creates a false sense of confidence in the precision of the project. These are the people who have decided, for various reasons to live in Riverside, Orange, Imperial Counties or Northern Baja Mexico while continuing to work in San Diego, thus creating traffic, air quality and noise problems in San Diego. However, the methods by which the predicted population increase of 1 million new residents by 2030 will be accommodated without sacrificing our desired quality of life are really the issues under examination.

The RCP proposes to accommodate the increased population of 1 million persons by encouraging development in areas that are already urbanized with some infrastructure already present and reduced...
need for further infrastructure development when compared to rural areas that would need new roads, public transit, schools, fire protection and police personnel, water, sewage, waste disposal, etc.

**Land Use, Section 5.1**

“Although future development (under the RCP) could result in significant impacts from conversion of undisturbed vacant land, agricultural land, open space and other natural resources to urban uses” (page 5.1-23), there are no mitigation measures proposed to reduce this impact. We suggest the adoption of land use standards similar to those found in the County’s Resource Protection Ordinance as mitigation measures to reduce environmental impacts of proposed projects in SGOAs.

Encroachment of development into fire hazardous areas has not been addressed. The recent fires have caused massive loss of flora and fauna. Fire prevention measures include wise location of development, proper building codes and landscaping guidelines. Air and water quality impacts from these fires are long lasting. These fires are also economically and socially costly. The RCP must be designed to minimize fire danger. Homes continue to be located on ridgelines. Hilltops are cut to provide more homes with attractive vistas. Such developments are not only are aesthetically ugly but also highly prone to fire loss. Such developments act to provide fuel to fires as well. Home sites in canyons and on steep slopes are other fire prone locations. The global implications on climate change due to loss of carbon pools in forests and grasslands should not be ignored. The Intergovernmental Panel on Climate Change (IPCC) Special Report on Land Use, Land-Use Change, and Forestry discusses the global carbon cycle and how different land use and forestry activities currently affect standing carbon stocks and emissions of greenhouse gases. An excerpt from the preface states; “This Special Report examines several key questions relating to the exchange of carbon between the atmosphere and the terrestrial pool of aboveground biomass, below-ground biomass, and soils. Vegetation exchanges carbon dioxide between the atmosphere and the terrestrial biosphere through photosynthesis and plant and soil respiration. This natural exchange has been occurring for hundreds of millions of years. Humans are changing the natural rate of exchange of carbon between the atmosphere and the terrestrial biosphere through land use, land-use change, and forestry activities. Consequently, it is important to examine how carbon flows between different pools and how carbon stocks change in response to afforestation, reforestation, and deforestation (ARD) and other land-use activities.”

The RCP focuses future development into more compact areas. The draft PEIR does not adequately address the potential that the compact development could increase the “heat island effects” due to solar heating. Without mitigations, there will be added heat load on residential and commercial/industrial structures and subsequent increase in energy demand for cooling these facilities. Mitigation measures including reflective roofing materials and providing shade with trees should be required. Green spaces provided by neighborhood parks and open space are other important means to reduce the heat load. Increased heat loads, unless mitigated, will have an inordinate impact including increased health risks on the lower income, the elderly, and older residential areas. Environmental justice issues need to be addressed in mitigating the increased heat load impacts to these communities.

**Transportation/Circulation Impacts, Section 5.4**

“It is expected that with the RCP some localized circulation networks would not be able to be improved to less than significant levels.” (Page 5.4-19) Since a major goal of the RCP is to encourage the development and use of public transit systems, systems that could be very effective in localized circulation networks, mitigation for localized transportation impacts could be addressed by promising

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1 A City of San Diego Guide to Canyon Fire Safety For Private Property prepared by Burn Institute, San Diego Fire Department and Fireman’s Fund Insurance Company.
the provision of increased transit services in a local area when LOS gets to a certain predetermined level. If Transnet money for transit is inadequate, Transnet money designated for local roads and highways could be diverted to transit use when LOS of those local roads gets to a certain level.

**Air Quality, Section 5.5**

"Increases in vehicle congestion associated with increases in urban density have the potential to create hot spots, creating a significant air quality impact." (page 5.5-19) Trans 1 is suggested as a possible mitigation measure (page 5.4-18) but our suggested mitigation measure of increasing transit services could also mitigate for the air quality hot spots.

**Noise, Section 5.6**

Section 5.6.1 Existing Conditions does not provide noise measurements by which to compare the RCP impacts. The draft PEIR should tabulate local government noise ordinances, and enforcement policies. The environmental impacts on human and wildlife are of growing concern. The World Health Organization\(^3\) is addressing the noise issue. Other cities in California are establishing noise policies as well. The draft PEIR should address the growing concern over urban noise sources including loud stereos in homes and vehicles, loud exhaust systems used in motorcycles and vehicles, barking dogs, leaf blowers, etc.

Mitigation Measures. Given our mild climate that makes outdoor activities an essential part of our lifestyles, high ambient noise will significantly detract from this valued asset. As density of the development increases, without stringent noise source control, the quality of life not to mention the impacts on human health will be significant. Emphasis on source control does not mean that sound proofing measures should not be used as well. Noise monitoring should be conducted on regular basis to determine the effectiveness of the noise control measures.\(^4\)

**Energy, Section 5.7**

The Sierra Club encourages development of renewable, local energy sources, such as photovoltaic energy. We would like to see more emphasis on single building uses of this type of energy. Reduction of energy use should also be achieved through energy conservation through the requirement for lower energy-requiring appliances in new development. Since this is a regional plan, regional cost reductions for photovoltaic installations, use of low energy appliances and extra bonuses on HOV lanes for low energy vehicles are all methods that should be made a part of the mitigation package.

**Hydrology/Water Resources, Section 5.9**

Page 5.9-6 description of the RWQCB Municipal Separate Storm Water Systems (MS4) is incomplete. Amend the PEIR by stating that the MS4 requires the transition from the jurisdictional planning to the watershed urban management program. Address the planning implications to implement this change.

The mitigation measures in section 5.9.5 are superficial and do not convey the details for storm water management practices defined in the RWQCB MS4. These mitigation measures must be significantly strengthened to comply with the MS4. Consequently, we cannot concur the PEIR has shown the implementation of the RCP would result in a less than significant water quality impact at the program level.

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\(^3\) [http://www.thewalljournal.com/a1f04/schwela.pdf](http://www.thewalljournal.com/a1f04/schwela.pdf)

\(^4\) [http://www.lighthousewoods.com/noise_other_areas.html](http://www.lighthousewoods.com/noise_other_areas.html)
Biological Resources, Section 5.10

Section 5.10.5 Bio-10 cites only habitat creation to mitigate unavoidable impacts to future coastal projects. This does not address impacts that cause loss of benthic communities that are unique to the area. The draft PEIR cites Bio-10 as a mitigation measure for coastal desalination plants. It is highly questionable that terrestrial impacts of desalination plants could be mitigated by offsite habitat creation as coastal resources are fully developed. The loss of marine life due to impingement and entrainment in the water intake structures of the desalination plants cannot be avoided through habitat

Public Services/Utility Systems, Section 5.12

Solid Waste Management. The draft PEIR cites Gregory Canyon landfill proposal. This remains a highly controversial issue. There are both environmental and environmental justice concerns. The Sierra Club opposed Proposition C that paved that way for this proposal.

Water supply. Water supply actions should be prioritized. We believe that efficient water use and water conservation methods deserve the highest priority in meeting the region water supply needs. The Pacific Institute report "Waste Not Want Not: Potential for Urban Water Conservation in California" estimates that up to 1/3 of California's current urban water use can be saved using existing technology. Currently, about 50% of the water region water use is for landscaping. Water wise landscaping using preferably native vegetation can significantly reduce water demand. Reducing water for landscaping has the additional benefit of reducing urban runoff. Furthermore, native and drought landscapes reduce the need for fertilizers and thereby help to reduce the nutrient impacts of urban runoff. Still another benefit of native landscapes is that they provide natural habitat for wildlife. Water reuse should be the next highest priority.

Seawater desalination should be resorted for a water supply as the last resort. There are numerous environmental impacts associated with seawater desalination. Because coastal region is fully developed, the SDCWA Regional Water Facilities Master Plan show plans for seawater desalination plants co-located at existing coastal power plants. The desalination plants take advantage of the existing seawater cooling systems for the power plants to provide the feed water and electrical power. The major concern with these seawater desalination plants is the loss of marine life due to impingement and entrainment in the seawater intake. Any marine life that remains alive is killed by biocides used to prevent fouling of the power plant cooling system. EPA has issued measures that are to be used to reduce the loss of marine life for cooling water intake structures in section 316(b) of the Clean Water Act. Environmental groups are contesting these measures as not being effective in protecting marine life. The brine waste from the desalination process that is discharged back into the power plant cooling system ocean outfall also poses impacts to the marine environment.

Thank you for the opportunity to comment on the PEIR. The RCP meets many of the needs for regional planning of this area. The Plan is consistent with Sierra Club policy as expressed in the Sierra Club California Urban Growth Policy Guidelines: "The object of growth management is to achieve compact, mixed use, transit-oriented, pedestrian and bike-friendly neighborhoods supplied with housing affordable to local employees, good public transit and abundant parks, natural areas, and open spaces, and with outlying areas protected from development."

Sierra Club members Ed Kimura and Janet Anderson prepared this document.

Sincerely,

Janet A. Anderson

http://www.pacinst.org/reports/urban_usage/index.htm

3820 Ray Street, San Diego, CA 92104-3623
www.sierraclub.org
R-1 This comment provides opening remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

R-2 SANDAG has reviewed the growth trends and modeled growth projections (jobs, housing and population). Based upon this modeling effort, it is projected that population growth of 1 million people will occur within the region. This growth projection includes both in migration and native births. This growth is anticipated to occur without any intervention by SANDAG or any of the local jurisdictions. The modeling has identified a deficit of approximately 93,000 homes that cannot be accommodated in the region due to insufficient capacity identified in existing land use plans. It is not a goal of the RCP to encourage additional units in this region unless the other issues in the RCP can be implemented which would facilitate the assimilation of growth in the region that is sustainable. The RCP is an incentive based framework to plan for future growth. The incentives are provided so that growth can occur where it makes sense and where facilities are available to minimize or eliminate negative impacts and address quality of life issues outlined in the RCP. The additional 46,000 homes discussed in the RCP EIR is provided for analysis purposes as the RCP does not have a stated goal to “capture” units in the region.

Analysis in the EIR considered both the increase of all future growth in the region (buildout of existing general plans), and the difference of the buildout with and without implementation of the RCP. The plan-to-ground analysis is what is required by CEQA, however; the EIR included both a plan-to-plan and a plan-to-ground analysis. The significance of an impact is determined by the results of the plan-to-ground analysis.

With regard to impacts on existing public services and facilities in developed areas, the EIR analyzed the impact of the RCP on public services and utility systems. The EIR concluded that implementation of the RCP would result in significant impacts to wastewater, school, police/sheriff protection, fire protection, and park/recreation services, and potentially significant impacts to water supply. Mitigation measures were identified to reduce these impacts to below a level of significance. Please see section 5.12.5 for a summary of the public service and utility system mitigation measures.

R-3 The EIR identified significant and unmitigated impacts due to the conversion of undisturbed vacant land, agricultural land, open space, and other natural resources to urban uses. Mitigation measure Land Use-2 will reduce some of the impact to agricultural resources. Additionally, the biological resource mitigation measures would reduce some of the impacts to natural resources. Specifically Bio-1, Bio-6 and Bio-7 will reduce some of the impacts associated with development in open space. These mitigation measures have been added to the land use summary in
Section 5.1.6 of the Final EIR. However, as noted in the EIR, these impacts are not feasible to fully mitigate since some development will occur resulting in unmitigable impacts.

Additionally, as stated on page 3-19 of the Final EIR, the RCP is dedicated to preserving natural biological communities and species native to the region. This includes undisturbed vacant land, agricultural land, open space, and other natural resources. Actions described in the RCP to achieve these goals include coordinating and cooperating in habitat management and monitoring functions throughout the region, protecting agricultural soils for future crop production, foraging habitat, and buffers between native habitats and urban development, and coordinating with the U.S. Fish and Wildlife Service and the California Department of Fish and Game to establish and maintain regional databases for biological monitoring.

The County already has a Resource Protection Ordinance (RPO) in place. The RPO addresses wetlands and wetland buffers, floodways, floodplain fringe, steep slope lands, sensitive habitat lands, and prehistoric/historic sites. The EIR has incorporated mitigation measures to address impacts to wetlands (Bio-4, Bio-5 and Bio-9), sensitive habitat lands (Bio-1, Bio-4, Bio-5, and Bio-7), and prehistoric/historic sites (Cult-1 through Cult-5). The EIR analyzed development in floodways and floodplains in Section 5.9 of the EIR. The analysis concluded that the RCP would result in a less than significant impact.

The RCP will not alter any resource protection ordinances already adhered to by the County or other jurisdictions. Furthermore, site specific projects will have to address all impacts significant resources, in compliance with CEQA, and develop adequate mitigation to reduce those impacts to below a level of significance. The only way to completely mitigate the impacts is if no growth was to occur.

The RCP encourages densification along major transportation corridors and will concentrate development in areas that do not have a high potential for wildfire and where adequate fire protection resources already exist. However, the RCP anticipates that implementation of existing general plans would allow development to take place in remote areas adjacent to vegetation that could serve as fuel for wild land fires. These fire risks will be addressed by existing regulations in each jurisdiction. These include requiring emergency secondary access roads, architectural treatments (e.g., tile shingled roofs, reduced wood exteriors, and sprinklers), fuel management around development, emergency service providers and adequate fire protection services (e.g., water flow, hydrants). It is recognized that even with these measures, unavoidable loss of property and life may occur as a result of wildfires, particularly where people have chosen to build houses in or adjacent to high fuel areas.

Fire protection services were analyzed in Section 5.12 of the EIR. The analysis concluded that implementation of the RCP would result in significant impacts to
local fire protection services, and may require the expansion of fire protection facilities. Mitigation was provided to reduce this impact to below a level of significance. The global implication of carbon stocks can not feasibly be addressed in this document.

R-5 Although densification will result in heat increase ranging from 2 to 8 degrees, this increase will not be significant. (San Diego Regional Energy Office, 2004). Jurisdictions already have floor/area ratio requirements and landscaping requirements that provide for heat attenuation. Additionally, there is no evidence that minority or low-income populations would impacted above and beyond any other population group.

Environmental Justice is an important goal of the RCP, which the document describes as “ensuring that land use plans, policies, and actions do not disproportionately affect low-income and minority communities” (page 244). Environmental justice efforts undertaken by the RCP are described in further detail in Chapter 6 of the RCP document.

R-6 The EIR has recognized that localized impacts to local transportation networks may occur. To the extent possible, the RCP has attempted to self-mitigate these impacts by targeting development near existing transportation corridors to increase people ability to utilize existing transportation systems. However, at the regional planning level, it was concluded that some local circulation networks, particularly those that serve existing transit nodes, may be affected and may not be mitigable due to there use by people utilizing transportation nodes. SANDAG will continually monitor transit fund allocations and address those allocations as needs change.

R-7 The comment recommends adding a mitigation measures that would utilize TransNet money designated for local roads and highways for transit improvements when localized roadways reach a certain (assumed to be unacceptable) LOS. The allocation of TransNet funding is currently set at 3.1% for bicycle, pedestrian, and administrative; 33.2% for mass transit; 32% for local roads, and 31.7% for freeways. These allotments were set by the ballot initiative which created the TransNet program. Any redistribution of the funding, such as suggested in the comment, would require a vote of the public, and it is speculative to determine results of a public vote. Therefore, the suggested mitigation measure to reallocate TransNet funding is determined to be infeasible.

R-8 The RCP is a policy document and has been analyzed in a program level EIR. It is too speculative to conduct site-specific noise studies at the program level. Noise impact analyses will be conducted at a site specific level, in compliance with CEQA, once specific projects are planned. These analyses will identify potential impacts and the necessary mitigation measures required to reduce those impacts to below a level of significance. Potential noise conflicts created by smart growth initiatives could include the adoption of land use plan amendments by
jurisdictions to eliminate inconsistencies between future land uses and densities identified in the RCP. Noise mitigation should include site planning that shall consider ways to avoid impacts to noise sensitive areas and reduce noise and vibration levels by maximizing distance to sensitive receptors (human or wildlife) or incorporating acoustical barriers, operational constraints that will reduce noise to levels established by each jurisdiction for the appropriate land use, avoiding noise and vibration impacts by the careful siting of facilities and the use of noise-reducing berms, walls, or other barriers as deemed appropriate by local jurisdictions, and utilizing architectural treatment (sound-proofing) to reduce interior noise.

R-9 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

SANDAG is committed to promote and encourage the use of photovoltaic energy and other sources of renewable energy. The RCP cites the development of renewable energy resources, including wind, solar, and geothermal, to help meet the region’s needs in an environmentally sensitive manner (page 185). It is not within the power of SANDAG to require residents to use energy efficient appliances. However, SDG&E currently provides rebates to homeowners who purchase and install energy conserving appliances.

HOV lanes are implemented by Caltrans for all major freeways, which are implemented where feasible with respect to operational constraints such as access to freeway off ramps, right of way ability, etc.

R-10 Implementation of the RCP will not supercede or change any existing regulations, including those stipulated by the RWQCB Municipal Separate Storm Water Systems (MS4). San Diego MS4 Permit regulates urban runoff discharges from the County of San Diego, the 18 incorporated cities of San Diego County, and the San Diego Unified Port District. All development associated with the RCP will comply with all applicable policies of the San Diego MS4 Permit, including adherence to the watershed urban management program.

R-11 The RCP is a regional plan and is analyzed at a program level in the EIR. The RCP does not affect the applicability or enforcement of existing regulations. MS4 is assumed as part of the existing regulations and will not be superceded by the RCP. Consistent with the requirements of the MS4 permit, future projects which meet certain criteria (e.g., commercial development with a project footprint greater than 100,000 s.f, residential development of 10 or more units, automotive
repair shops, restaurants, hillside development resulting in an impervious surface which is greater than 5,000 s.f., etc.) will need to prepare a Standard Urban Stormwater Mitigation Plan (SUSMP). This plan will include BMPs appropriate for the specific type of project. The SUSMP must be approved by the local jurisdiction prior to the receipt of a grading permit. Since these requirements are already in effect and SANDAG does not have the authority (nor would it have any desire to reduce these requirements), all specifications dictated to occur as a part of the MS4 will continue to be enforced. As stated above, implementation of the RCP does not supercede this existing regulation.

R-12 This comment states that the proposed mitigation measure for impacts from future coastal projects does not address potential impacts to benthic communities. Mitigation measure Bio-10 states that future coastal projects shall be sited and designed to minimize impacts to marine resources. The measure also states that any unavoidable impacts to significant marine resources will be mitigated to below a level of significance in accordance with the requirements of the local jurisdiction and appropriate agency (e.g., CDFG, USFWS, NMFS). The term “marine resources” in the mitigation measures would include benthic communities.

Project specific impacts will be addressed at the project level, in compliance with CEQA. If a biological community is significantly impacted according to CEQA, project specific mitigation will be required.

R-13 The RCP has no effect on Proposition C. The Gregory Canyon Landfill was mentioned only because it has potential landfill capacity. Pursuant to Title 27, Division 2; and Title 14, Division 7 of the California Code of Regulations, the Gregory Canyon Landfill will only be utilized if the landfill receives all permits. If Proposition C is overturned, the landfill will not be used.

R-14 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

Many jurisdictions have local requirements to utilize reclaimed water and regional landscaping requirements. However, water quality regulations and distribution networks currently preclude the use of reclaimed water by individual homeowners. Drought tolerant landscaping is encouraged by most jurisdictions.

The actions in each chapter of the RCP are broken down into three categories: Planning, Design, and Coordination; Program and Project Development and
Implementation; and Funding, and as such, are not listed in order of priority. Additionally, any prioritization in the case of water would take place under the San Diego County Water Authority through the Urban Water Management Plan and Regional Water Facilities Master Plan. The RCP calls for continued implementation of these documents.

R-15 Impacts associated with the implementation of desalinization will be analyzed and mitigated at the project level, in compliance with CEQA, in order to reduce these impacts to below a level of significance. If the measures released by the EPA being contested by environmental groups are changed, then desalinization will comply accordingly. However, no matter what the outcome of the contesting of these regulations, desalinization programs associated with the RCP will comply with the pertinent regulations guiding the impingement and entrainment of water at existing power plants.

R-16 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
May 13, 2004

Mr. Rob Rundle
Senior Regional Planner
SANDAG
401 “B” Street, Suite 800
San Diego, California 92101

RE: Comments Relating to SANDAG’s Draft Program Environmental Impact Report for SANDAG’s Regional Comprehensive Plan

Dear Mr. Rundle:

Our firm represents Pardee Homes (“Pardee”) in connection with its ownership of several properties located in the City of San Diego. We have reviewed the March 2004 Draft Program Environmental Impact Report (“Draft PEIR”) which has been prepared by SANDAG for the Regional Comprehensive Plan for the San Diego Region (“RCP”). Our client has the following comments.

**Page 1-2:** This page states that the RCP’s purpose is to provide a comprehensive framework for greater coordination of regional transportation and land use planning for local jurisdictions and infrastructure providers so that such jurisdictions and providers can update their plans in a manner that achieves the following objectives:

1. Capture housing units that are expected to be exported.
2. Encourage sustainable development by making land use decisions and investments that are good for the environment.
3. Support smart growth through prioritization of regional transportation funds.
4. Achieve fairness and equity in regional planning and development processes.

Absent some better definition of policies and implementation measures, it is impossible to evaluate fully potential impacts and project alternatives.
Mr. Rob Rundie  
May 13, 2004  
Page 2

**Page 1-5, Smart Growth Opportunity Areas:** These areas are not shown in sufficient detail to allow the reader to understand potential impacts. The discussion should illustrate boundaries, acreage and development potential for each area. The Draft PEIR should estimate the amount of future development that will occur outside Smart Growth Opportunity Areas.

**Page 2-2:**

Page 2-2 states as follows:

"Because the RCP is a planning document intended to guide actions through the year 2030, only program-level and qualitative evaluations are provided in the PEIR."

Without some quantification, the Draft PEIR and the RCP are of little utility because of the general nature of the documents.

**Pages 3-4 – 3-7:**

Page 3-4 states as follows:

"Support ‘smart growth’ through prioritization of regional transportation funds."

Page 3-7 states as follows:

"Once these areas are designated by local jurisdictions for development types, densities and intensities consistent with the goals of this plan, transportation facility improvements and other infrastructure will be targeted to these areas."

These statements imply that funds may/will be diverted from some areas planned for urban development. Potential impacts should be identified in the Draft PEIR for the effect(s) associated with any diversion of funds.

**Page 3-15, Intended Uses of the PEIR:** Given the superficial analysis and facts presented in the Draft PEIR, it is doubtful the Draft PEIR will be useful for the subsequent actions listed here. The Draft PEIR needs a comprehensive discussion to be included here.
Mr. Rob Rundle  
May 13, 2004  
Page 3

Page 5.1-18:

Page 5.1-18 states as follows:

"The RCP encourages development to be compact, and to occur in areas of existing development."

Does the RCP discourage development in vacant or underdeveloped areas currently planned for urban and suburban development? Is it strictly a redevelopment strategy? There is no analysis in the Draft PEIR which addresses this subject.

Page 5.2-4: Table 5.2-3 is incorrect. 2030 forecasts should be reversed.

Page 5.4-11:

Page 5.4-11 states as follows:

"Give priority to regional roadway and transit investments in Smart Growth Opportunity Areas while recognizing the need for transportation improvements elsewhere in the region."

This statement is of little value. The RCP will either change priorities or retain the status quo. Which will it be? What will be the impact of diverting transportation funds to Smart Growth Opportunity Areas? Please provide such an analysis.

Page 5.5-17:

Page 5.5-17 states as follows:

"The future smart growth land use pattern under the RCP would support a mixed-use development facilitating alternative modes of transportation such as walking or bicycling. The smart growth concept and concentrated urban nodes could reduce average trip distances and encourage transit use."

The RCP and Draft PEIR do not give enough credit to suburban developments such as Pacific Highlands Ranch – see RCP comment letter.

Page 5.6-11, Rail Traffic: The Draft PEIR should reference the new federal “Quiet Zone” rules.
Mr. Rob Rundle  
May 13, 2004  
Page 4

Pages 5.10-10 and 5.10-17:

Page 5.10-10 states as follows:

"By focusing on compact, more environmentally sensitive development patterns, impacts to native habitat and wildlife, and habitat fragmentation and isolation within the San Diego region will generally be reduced."

This does not necessarily follow. Unless areas are purchased by a public agency, the result may simply be somewhat larger rural residential parcels with limited, if any open space value. Thus, the Draft PEIR does not necessarily make the case that significant, unmitigated impacts to biological resources would be greater without RCP implementation.

In conclusion, we believe the Draft PEIR contains a discussion of idealistic goals and planning objectives, but never sets forth specific policies and implementation measures. The Draft PEIR is therefore of limited utility because without specific policies and/or implementation measures, there is no action(s) against which potential impacts and project alternatives can be analyzed.

We thank you for the opportunity to comment on the Draft PEIR and request that you please place my name on your mailing list of persons seeking notices for future versions of the Program Environmental Impact Report.

Please call me at (619) 685-3038 if you have any questions or concerns regarding the information contained in this letter.

Very truly yours,

Thomas F. Steinke  
Seltzer Caplan McMahon Vitek  
A Law Corporation

cc: Pardee Homes  
O:\44352\48812\couns\lettndag-rcp4-327.doc
S-1 This comment provides opening remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

S-2 Due to the scope and breadth of the project, the RCP has been analyzed at the program level. Specific details pertaining to the implementation of the RCP are included in the Revised Working Draft RCP, dated May 24, 2004. As implementation takes place, more detailed analysis of specific issue areas will be conducted at the project level in compliance with CEQA. If the RCP is adopted, local jurisdiction will evaluate constraints within their jurisdiction while looking at the projects proposed within the SGOA identified in the RCP. These project-level analyses will be prepared in compliance with CEQA, and will identify potential impacts and the necessary mitigation measures required to reduce those impacts to below a level of significance.

Pursuant to CEQA Guidelines Section 15145 states:

“If, after through investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impacts.”

Additionally, Section 15146 states:

“The degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.”

Thus, the analysis presented in the EIR addressed the impacts to the extent feasible.

S-3 The level of analysis for the RCP was done at the program level. Please see response to comment S-2.

S-4 Please see response to comments S-2 and S-3.

S-5 The Draft EIR does not state that funds will be diverted from some areas, but that SANDAG will attempt to prioritize transportation funds to those areas that have designed their land uses to be compatible with smart growth. However, this will not result in a complete depletion of funds for those that have not designed their transportation planning to be compatible with smart growth or are not located within the SGOA. While SANDAG wants to give priority to the SGOA, it recognizes that other areas within the region will have transportation needs that must be met along with those projects targeted within the SGOA.
The RCP has been analyzed at the program level due to the scope and breadth of the project. Please see response to comment S-2.

The RCP does not discourage development in vacant or underdeveloped areas currently planned for urban and suburban development. The RCP does, however, call for jurisdictions to examine their planned land uses, and make changes to local plans to increase multifamily housing in key locations, particularly along existing and planned transportation corridors and close to employment and other services. The RCP also calls for jurisdictions to identify and develop appropriate underutilized sites for housing, such as vacant shopping centers and deteriorated strip commercial centers. The RCP assumes that, over time, existing General Plans will incorporate SGOAs.

An error was detected in Table 5.2-3 of the Draft EIR that has been updated. The revised table is presented below and appears on page 5.2-4 of the Final EIR.

Table 5.2-3
Regional Growth Forecast
With and Without RCP

<table>
<thead>
<tr>
<th>Issue Area</th>
<th>2030 With RCP</th>
<th>2030 Without RCP</th>
<th>Difference</th>
<th>Percent Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>3,985,725</td>
<td>3,855,085</td>
<td>130,640</td>
<td>3.4 %</td>
</tr>
<tr>
<td>Housing Units</td>
<td>1,400,136</td>
<td>1,354,136</td>
<td>46,000</td>
<td>3.4 %</td>
</tr>
<tr>
<td>Employment (^{(1)})</td>
<td>1,836,174</td>
<td>1,824,030</td>
<td>12,144</td>
<td>0.7 %</td>
</tr>
</tbody>
</table>

Note:
\(^{(1)}\) Induced service employment increase resulting from the additional 46,000 households under RCP is calculated at 0.264 service jobs per additional household (SANDAG 2004).

The statement cited in the comment is stating that areas not located within the SGOA will not be precluded from receiving transportation funds. While SANDAG wants to give priority to the SGOA, it recognizes that other areas within the region will have transportation needs that must be met along with those projects targeted within the SGOA.

The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
The EIR acknowledges the existing conditions, both on the ground, as well as the existing land use plans adopted by the local jurisdictions. In the smart growth classification matrix included in the Revised Working Draft RCP, Pacific Highlands Ranch is included as an example in the "Community Center" category. Additionally, the Urban Form chapter includes discussion of smart growth in both new projects and redevelopment, and lists examples (p.66).

S-11 A Quiet Zone is a designated area which is situated on one or a number of consecutive rail crossings at which locomotive horns are not routinely sounded. Since the RCP does not propose to alter any designated Quite Zones, no analysis was necessary. If a subsequent site specific project is proposed adjacent to a Quite Zone, site specific impacts, including noise, would need to be addressed. Any railway projects or development adjacent to existing railways associated with the RCP will have to comply with all applicable regulations including federal Quiet Zone rules.

S-12 The RCP will have fewer environmental impacts on native habitat and wildlife, and habitat fragmentation and isolation than if development were to proceed without any guidance at a regional scale. The RCP will concentrate development near existing transportation corridors in order to meet housing demands within the region in a way that will preserve more land than if development were to take place without the RCP. Therefore, implementation of the RCP will preserve native habitat and wildlife and prevent habitat fragmentation and isolation to greater degree than if development were to take place without the RCP.

S-13 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
From: Patricia Aguilar [mailto:pataguiara@cox.net]
Sent: Thursday, May 13, 2004 11:33 AM
To: Rundle, Rob
Subject: comments on draft PEIR for Regional comprehensive Plan

I believe the draft report is inadequate in two respects.

1) It assumes, with no documentary evidence presented, that directing development to "Smart Growth Opportunity Areas" by densifying these areas will capture housing units anticipated to be exported to Baja, Riverside, Orange and Imperial counties. Please provide references to the documentary evidence on which this assumption is based. In other words, where is the evidence that densification of the Smart Growth Opportunity Areas will result a decrease in the numbers of people who would otherwise settle in the outlying counties? In fact, both things may occur.

2) The transportation/circulation section does not analyze existing and future levels of service on I-805.

I will look forward to seeing your response to these comments in the FPEIR. Please forward a copy of this document to me once it is completed.

Patricia Aguilar
1048 Surrey Drive
Bonita CA 91902
T-1 Implementation of the RCP could provide more housing in the region, thereby offering a broader range of housing opportunities. Additionally, the RCP outlines a framework to encourage housing that is convenient to the major transportation networks in San Diego County.

The commenter is correct in stating that even with densification within the SGOA, some people may still settle in outlying areas. This concern was realized in the EIR, and, as noted on page 3-7 of the EIR, 40 to 60 percent (37,000 to 55,000 units) of the 93,000 units that are expected to be exported out of the County were considered for analysis purposes only. It should be noted that the RCP does not have a stated goal of increasing the region’s housing capacity by 46,000 units, rather outlines and encourages goals, policy objectives, and actions to improve the region’s quality of life. These quality of life measures could lead to smart growth development that offers transportation and housing choices that are limited today. SANDAG recognizes that complex regional planning, coordination between local and regional agencies, and other political and fiscal realities will impact the number of units that are actually “captured.”

T-2 Table 5.4-1 has been expanded to include existing peak hour regional freeway LOS for I-805. Table 5.4-2 has been expanded to compare the existing and future peak hour LOS. The specific information regarding I-805 is provided below.

<table>
<thead>
<tr>
<th>Interstate Segment</th>
<th>Existing LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interstate 805</td>
<td></td>
</tr>
<tr>
<td>I-5 to SR-52</td>
<td>LOS F</td>
</tr>
<tr>
<td>SR 52 to I-8</td>
<td>LOS F</td>
</tr>
<tr>
<td>I-8 to SR-94</td>
<td>LOS F</td>
</tr>
<tr>
<td>SR 94 to SR-54</td>
<td>LOS E</td>
</tr>
</tbody>
</table>
## Existing Condition vs. 2030 Roadway Operations

<table>
<thead>
<tr>
<th>Street Segment</th>
<th>Existing Levels of Service (1)</th>
<th>2030 With Project Level of Service (2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interstate 805</td>
<td>LOS F</td>
<td>LOS A–E</td>
</tr>
<tr>
<td>I-5 to SR-52</td>
<td>LOS F</td>
<td>LOS A–E</td>
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<tr>
<td>SR 52 to I-8</td>
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<td>LOS A–E</td>
</tr>
<tr>
<td>SR 94 to SR-54</td>
<td>LOS E</td>
<td>LOS A–E</td>
</tr>
</tbody>
</table>

Notes:

(1) Source: SANDAG Mobility 2030 Study, Figure 7.3
(2) Source: SANDAG Mobility 2030 Study, Figure 2.1

Worst-case mainline LOS is shown

LOS = Level of Service
May 12, 2004

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

Dear Mr. Rundle:

The SANDAG’s “Draft Program Environmental Impact Report for the Regional Comprehensive Plan for the San Diego Region [Draft EIR]” dated March 2004 (SCN 2004011141) has two serious problems which should be corrected before the report is accepted.

The first problem is pervasive throughout much of the report. It is assumed that it is possible to take 46,000 dwelling units that are projected to be built outside of San Diego County (e.g., Baja, Riverside County) to serve San Diego County workers and build them inside San Diego County without increasing the projected number of San Diego County workers (and associated impacts like traffic congestion and air pollution). From an economic standpoint, this is impossible.

To understand the rational behind this statement, one needs to ask why someone who lives in Baja or Riverside works in San Diego? The answer here is straightforward. These workers are trading-off higher commuting costs against lower housing costs outside of San Diego County. The only way to change this is to be able to build housing of the single family detached type (favored in particular by those choosing to live in Riverside County) at a substantially lower cost than under the no project/existing plans alternative. While this is highly unlikely, lower detached housing cost would induce migration into San Diego from other parts of the country and hence the EIR should be redone with a larger workforce. More plausibly average housing costs might be lowered by a switch to a heavier multifamily mix. However, in this case there would be strong incentives to live in Riverside for those wanting detached housing and, hence, the RCP still would need redone with a larger workforce.

The second problem has to do with the construction of the “No Project/Existing Plans” (EXISTING) alternative relative to the Proposed Project (RCP). The “No Project/Existing Plans” should refer to what is allowed in terms of the number of dwelling units by the current plans of different jurisdictions coupled with whatever region wide transportation, air quality, and energy conservation plans are likely to be put in place independent of any decision on how many dwelling units are allowed above the current general plans. The consequences of the failure to correctly define the EXISTING alternative can best be seen in the main comparison Table 1.7-1. Here making corrections for the same transportation, energy, air quality plan would make the EXISTING alternative have the best overall score. The “5” versus “3” rating for regional transportation is particularly egregious.

Sincerely,

Richard T. Carson
Professor
The forecasting process behind the RCP uses land use information (land use elements of general plans) from each of the 19 jurisdictions to help determine the capacity for growth in the region. Using the land use elements of general plans provides the basis of the base case scenario of capacity and the guidelines for spatial distribution of growth (i.e. population, housing units, employment, etc.). The base case scenario, which relied on SANDAG’s 2030 population growth forecast, identified a lack of capacity for 93,000 units through 2030, or an “export” of 93,000 units. For analysis purposes, the RCP EIR assumed 46,000 of these units could be recaptured within the San Diego region with implementation of the Proposed Project, or that capacity could be increased in the region to accommodate that level of additional growth. The analysis still recognizes that some export of housing units would still occur for a variety of reasons (e.g. housing preference, commute distance).

But how much and where the region will grow is influenced by more than land use information, and is dependent on many things. SANDAG takes account of the most important factors that influence growth in its “modeling” process, including, relative rates of job growth and unemployment, the relative price of housing, housing unit preference factors and household size determinants, employment and retirement related migration rates, and birth and death rates, to name a few.

The base case scenario is used to estimate many impacts, including air quality and traffic congestion. The RCP analyzes this base case scenario and asks whether it can be improved upon using standard local government policy options. Improved upon, here, means improve the region’s quality of life, including better air quality and less traffic congestion, above what is expected to occur in the base case.

One of the local government policy options that would improve the region’s quality life (compared with the base case) is for jurisdictions in the region to embrace and implement “smart growth” land use policies. SANDAG believes that the “way” growth is planned for and implemented will affect the region’s quality of life. SANDAG believes public policies can influence the quality of life, and that “how” and “where” growth occurs in the context of the RCP is more important than the “how many.”

From an economic standpoint, growth accommodated under “smart growth” conditions is like an increase in efficiency and productivity; we are planning to utilize the growth in our human and physical resources in a more efficient manner, resulting in an improved quality of life. In other words, if the 46,000 housing units were located in Riverside, our quality of life, including air pollution and traffic congestion, would be worse, than if the units and people were located in the San Diego region in smart growth opportunity areas.

The second part of this comment relates to the reason people would choose to work in San Diego and live in Riverside. The comment states that this decision is
based solely on the preference for a single-family house purchased at a price that reflects a trade off between purchase price and commute time. More to the point, southern Riverside County and northern Baja have become part of the San Diego region’s housing market; just as the San Diego region is part of their job market. There are numerous examples in the Los Angeles and Bay areas. And this is no different than a Chula Vista resident working in San Diego’s North County; in fact it would be more efficient, from an economic standpoint, for the Chula Vista resident to commute to work from southern Riverside. Also, some of San Diego’s North County residents commute to South County to work; it would be more efficient for them to commute to southern Riverside. Increasingly the county boundary is playing less and less of a role, if any, in the decision of where to live and work.

The RCP has taken the process issues mentioned in the comment and provided a new solution based on results, one that focuses on policy decisions that can improve the region’s quality of life.

U-2 The No Project/Existing Plans Alternative does refer to what is allowed in terms of the number of dwelling units by the current plans of jurisdictions. It is not reasonable to assume that the same regional transportation, air quality, energy conservation plans would occur with the No Project Alternative as with the proposed project. The Regional Transportation Plan, for example, is base on smart growth land use scenario similar to the RCP, and the same transportation investments (e.g transit improvements) would not occur with a land use scenario based on existing plans. Therefore, the No Project/Existing Plans Alternative is a legitimate alternative for comparison.

U-3 As stated in the Alternatives chapter of the EIR (Chapter 6) the RCP will have fewer impacts to transportation, energy, and air quality than the No Project/Existing Plans Alternative. By concentrating development around existing transportation corridors, the RCP will decrease vehicle miles traveled (VMT) and promote the use of alternative modes of transportation. Furthermore, by reducing VMT and promoting the use of alternative modes of transportation, the RCP will reduce the amount of air pollution created by vehicle exhaust and reduce the amount of energy consumed, and thus reduce the impacts to air quality and transportation to below that expected for the No Project/Existing Plans Alternative.
-----Original Message-----
From: ClarkeMH@aol.com [mailto:ClarkeMH@aol.com]
Sent: Thursday, May 13, 2004 1:44 PM
To: Rundle, Rob
Subject: Comments on draft EIR for the Regional Comprehensive Plan

Mary H. Clarke
1529 El Paseo Drive
San Marcos, CA 92069
760-510-9684

May 13, 2004

SANDAG
Attn: Rob Rundle
401 B Street, Suite 800
San Diego, CA 92101

RE: Comments on Draft Program Environmental Impact Report for the Regional
    Comprehensive Plan for the San Diego Region

Dear Mr. Rundle:

Thank you for the opportunity to comment on the draft EIR for the RCP. I think the draft EIR explains the alternatives for future regional growth very clearly. I am not convinced that the analyses of the alternatives and the conclusions reached are valid.

The preferred plan, which would increase growth in the region over and above what is currently planned in the general plans for the cities and the County, is not acceptable to me. Continued growth in the San Diego region will reduce the quality of life for current residents. I have no confidence that “smart growth” is achievable to reduce the pressures of sprawl-type development.

I attended one of the RCP workshops in 2003. It was held in Encinitas. There were several of us in attendance who are very concerned about the destruction of the environment due to excessive development, particularly in North San Diego County. At no time in that workshop was it stated that the objective of the RCP process was to increase population growth in the region by “capturing” some of the housing units that are expected to be “exported” from the region under currently adopted general plans. If that had been stated, I believe there would have been a loud outcry from many of the people in attendance. Instead, we played a “game” under the impression that our concerns for the environment would be considered. I feel that we were duped -- the preferred alternative is totally contrary to the concerns we were expressing.

The mitigation measures for the proposed project include the following:

*Local jurisdictions shall adopt land use plan amendments, including general plan amendments, local coastal program amendments and an amendment to the Port Master Plan to eliminate inconsistencies between
future land uses and densities identified in these plans, compared to future land uses and densities identified in the RCP. *(p. 1-15)*

What legal authority does SANDAG have to require land use agencies, such as the cities, the County, the Port Authority, etc., to amend their general plans to accommodate more growth? Please be specific and cite the applicable government codes so that I can access them and review them.

Secondly, on page 1-17, the draft EIR states, "Each agency is legally mandated to accept a certain amount of housing and the associated population growth." What is the legal mandate? Please be specific and cite the applicable government codes so that I can access them and review them.

I am convinced that there must be an urban growth boundary to protect San Diego's backcountry from urban development. The CWA line is the logical choice for this boundary. However, the analysis of alternative on p. 1-11 of the draft EIR indicates that this alternative has more impacts than any of the others. This seems illogical.

A combination of the Urban Growth Boundary Alternative and sprawl-reducing measures would probably be the most environmentally friendly approach to the issue of planning for the future of the San Diego Region. This type of approach should be considered before any decision is made on the RCP.

The SANDAG Board of Directors must decide, among other things, if the positive benefits of the RCP outweigh to unavoidable significant impacts. Some of the unavoidable, significant impacts are: increased population and housing; transportation and circulation impacts due to increased density; and reduction of the number of rare, endangered, sensitive and/or special status plants and animals. In the latter case, the draft EIR states that the impacts on these important environmental resources would be less under the RCP than under current land use plans. This conclusion is based on the assumption of successful "smart growth" strategies that would accommodate more housing and population but preserve more undeveloped land. This is a very shaky assumption, and encouraging population growth is likely to have very negative impacts on our valuable biological and other natural resources. I don't think "smart growth" will fix that problem.

In conclusion, I urge SANDAG to reassess the alternatives for the RCP. Promoting population growth in our region is not the answer to our problems.

Yours truly,

Mary H. Clarke
V-1 This comment provides opening remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

V-2 The commenter is correct in noting that participants at the Encinitas workshop emphasized protecting the environment as part of the first round of workshops. Seven workshops were held throughout the region and housing issues were widely-discussed at many of the other workshops, with many workshop participants expressing the need for the provision of additional housing in the region at more affordable price ranges and located closer to jobs, transit, recreation, shopping, and other uses. Within that context, the RCP takes a comprehensive approach to planning issues and attempts to balance various issue areas. The RCP has not been designed to induce growth, but rather to maintain and enhance the quality of life by planning for the projected population growth of 1 million people within the region. This growth projection includes both in migration and native births. Furthermore, implementation of the RCP is the most provides a framework to preserve environmental resources. By concentrating development near transportation corridors, a smaller amount of land would be developed. The RCP does not have a stated goal of increasing population or inducing growth in the region. The EIR identified additional growth as a basis for analysis. Otherwise it would be difficult to prepare any sort of meaningful analysis for goals and policy objectives that can be implemented in many ways. While the EIR did identify additional 46,000 units of those that are expected to be built in adjacent areas due to insufficient capacity in this region, the RCP does not usurp local land use authority.

V-3 SANDAG does not have legal authority to require land use authorities to amend their general plans to accommodate growth. The RCP is an incentive-based plan, and the mitigation measures are for those agencies that have land use authority to consider when they undergo plan updates. However, the State Department of Housing and Community Development (HCD) does have regulatory authority over the housing elements of local jurisdiction's general plans, as determined by California Government Code Section 65580. SANDAG plays a role in the housing element process, as stipulated by California Government Code Section 65584, which requires SANDAG to consult with HCD to determine the regional housing need, and to allocate this need by jurisdiction and income level. Jurisdictions must then show they have adequate sites with appropriate zoning, development, and infrastructure capacity to meet this need (Section 65583).

SANDAG recognizes that third party agency approval may be required; however, pursuant to State CEQA Guidelines Section 15126, SANDAG is required to identify the feasible mitigation measures. Specifically, Section 15126.4 states:
“An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy.”

Additionally, CEQA Guidelines Section 15091(a) states that a lead agency may make findings that changes or alterations in the project are within the responsibility and jurisdiction of another agency making the findings, and such changes can and should be adopted by such other agency.

“No public agency shall approve or carry out a project for which an EIR has been certified which identifies one of more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.”

V-4 Please see response to comment V-3.

V-5 The RCP will have fewer environmental impacts than the Urban Growth Boundary Alternative because the RCP will concentrate development near existing transportation corridors. Concentrating development near existing transportation corridors will preserve more land than the Urban Growth Boundary alternative. Similarly, the RCP will reduce impacts to traffic by shortening the vehicle trips for commuters and promoting the use of alternative modes of transportation. The reduction of vehicle miles traveled will similarly reduce impacts to air quality and energy. Therefore, the RCP will have fewer impacts than the Urban Growth Boundary Alternative.

V-6 The SANDAG Board of Directors has to decide whether to adopt the RCP, one of the alternatives, or the No Project/Existing Plans Alternative. The EIR is intended to serve as a disclosure document to inform the decision makers of the environmental effects of the project. The RCP has been designed to meet the projected population growth of 1 million people within the region. This growth projection includes both in migration and native births. The additional 46,000 homes included in the EIR for analysis purposes are not designed to induce growth but rather to meet the housing and mobility goals of the RCP, and to address the housing needs created by job growth within the region. The additional of housing units in the region will also result in a reduction of vehicle miles traveled (VMT), and a corresponding reduction in air quality impacts.

It should also be noted that the RCP is an incentive based plan that does not open the flood gates to additional development. Rather, incentives are provided to facilitate growth where it makes sense and is appropriate. Future development that seeks these incentives will be subject to project and site specific environmental analysis to identify impacts. These issues are not static as SANDAG regularly updates the Regional Transportation Plan and regional...
growth forecasts. These processes are monitored to ensure that assumptions made now are appropriate as conditions change in the future.

V-7 This comment provides closing remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
Thomas A. Davis
1657 Gotham Street
Chula Vista, CA 91913-2818
(619) 421-6577

May 10, 2004

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

Subject: Comments on the Draft Program Environmental Impact Report (PEIR) for the Regional Comprehensive Plan (RCP) for the San Diego Region

Attachment 1: Comments on the PEIR for the RCP.

As requested in your covering letter of March 26, 2004, comments on the PEIR are forwarded for your consideration.

Tom Davis
Attachment 1. Comments on PEIR for the Regional Comprehensive Plan

1. Executive Summary. Sections 1.3 and 1.4 refer to "Smart Growth" as a land use strategy that is intended to, "... capture some of the approximately 93,000 housing units that are expected to be exported from the region by 2030 as a result of current land use plans. The Smart Growth concept increases housing densities along routes identified in Figure 1.4-1, generally overlaid along the major interstate transportation corridors of the region. The thinking in support of Smart Growth apparently presumes that by increasing housing densities, the possible development of yet to be acquired mass transit systems, and the expansion of yet to be funded HOV freeway lanes and the dedication of additional Diamond Lanes on existing interstates would provide attractive, affordable housing and available mass transit a means to get to and from work sites by people who would otherwise find housing outside the region and drive to work, adversely impacting the interstate network of interstates. These assumptions are not proved anywhere in the PEIR or is factual evidence provided to support the contention that high-density corridors with hypothetical mass transit systems would significantly reduce the reliance of workers on automobiles suggested in the subsequent sections of the PEIR. One particularly glaring shortcoming is in the phasing of mass transit system that follows the construction of high density housing units. The logic of planning to build high density housing corridors first and later acquiring and constructing mass transportation systems and other high mobility transportation systems later is not explained.

Additionally, the availability of adequate utilities (water, power, sewage) in the years leading up to 2030 is nowhere addressed in the executive summary or elsewhere in the PEIR. This is a fatal flaw in that plans for capturing additional residents is pointless if there are insufficient utilities available to support the significant growth in population predicted.

Also not recognized, is the exponential growth factor that will result from the internal population expansion alone, not only in the years leading up to 2030, but in years subsequent to that. Population growth will obviously not stop or slow after the end of the planning period. What happens after 2030 if there is nothing left for the population after that date? Any plan that fails to recognize the continuing need for adequate utility service beyond 2030 will impose cruel hardships on future residents of the region. Illegal immigration from Mexico, one of the major contributors to regional population growth, is not included in the population projections.

2. Section 5.4 Transportation/Circulation. Figure 5.4-1 indicates that most major freeways and arterials in the region are currently operating at levels of service D, E, or F, yet the levels of service reflected in Figure 5.4-3 for 2030 are projected to be LOS A for the majority of freeways and arterials with minor areas of level of service F. The projections appear to be based on the assumption that the 2030 Mobility Network will not only be
implemented, but that it will significantly reduce automobile traffic congestion throughout the region. The proof and logic that implementation of 2030 Mobility Network will have the projected monumental impact on reducing the number of automobiles using freeways and arterials is not made anywhere in the PEIR. The regional projections for new housing units with the implementation of the RCP predict an increase of 301,640 units; 46,000 units without implementation of the RCP. At current levels of traffic vehicle trips prediction, implementation of the RCP could be expected to produce 3,016,400 additional vehicle trips per day that the regional freeways and arterials would be expected to carry and 460,000 daily vehicle trips per day if the RCP is not implemented. Since the present number of regional vehicle trips per day that the freeways and arterials support is about 11 million trips, and which is directly responsible for the significant areas of level of service E or F on freeways and arterials, the change in vehicle trips per day in order to not only accommodate projected population growth, but to improve level of service to C or better would require regional vehicle trips per day to be reduced by approximately five million vehicle trips per day – the equivalent of all of the expected three million vehicle trips per day generated by the additional one million new residents, in addition to a reduction of approximately two million vehicle trips per day from present levels. This would translate into a mass transit system capable of delivering approximately two million people per day from their homes to their work places and to other work related destinations during the course of a normal workday. This prodigious mass transit system, not currently planned or funded by any regional authority, would rival the systems in place for New York, Chicago, and London and approach the Nagoya and Osaka mass transit systems in capacity. The 2030 Mobility Network, upon which the Transit/Circulation portion of the PEIR is founded, does not begin to address the enormously complicated and expensive nature of the transportation system that is essential to the success of the RCP concept. Failure to adequately access the funding requirements of the transportation system and integrate the availability of transportation with the construction of regional housing units introduces fatal flaws into the PEIR. It is requested that the algorithms used to develop and support the very large mass transit system that is suggested in the PEIR be provided and explained.

3. Section 5.7. Energy. The future electrical power requirements of the region are a function of determining the average per capita consumption multiplying that figure into by the projected population increase and dividing that into the projected capacity of the Western Power Grid. If the result is negative the region will not be able to support the anticipated population increase projected by the year 2030. The PEIR does not perform that arithmetic which is a key factor for regional power growth planning. Based on the number and capacity of electrical energy producing sources and those expected to be available by 2030, the Western Electrical Power Grid will probably not be capable of supplying
the needs of the region. Perhaps this limit will be reached well before 2030. Good intentions and well meaning but unfeasible plans for alternate energy sources will not substitute. Future energy shortfalls should act to cause rethinking the "capture" of potentially exported housing units. Please provide the specific electrical availability projections over the period addressed by the PEIR and projected electrical power requirements for comparison.

4. Section 5.9. Hydrology/Water Resources. The DEIR devotes thousands of words to the description of water quality standards, pollution sources, ground water sources, and potential flood hazards, but not a word is given to the water needs of the future population cast against future water supplies. Water quality and the availability of minor sources of local ground water is pointless and without meaning if there is insufficient major sources of water available to supply the needs of the future population of the region. The shrinking supply of water from the Colorado River, aggravated by cyclic droughts in the Colorado River Basin (as is currently the case), the failure of the regional authorities to secure a reliable, adequate supply of water from the Central California Aqueduct Project, the failure to implement a massive program of desalting sea or brackish water, or the inadequacies of a program to supplement the regional water requirements with tens of thousands of acre-feet of recycled water assures that this essential and critical resource will fail to meet the needs of the region by 2030 or earlier. Since the economic growth of the region is oriented to attracting high-tech biotech industries, the lack of adequate water supplies will defeat the goal of attracting these industries, which generally require a significant, reliable supply of water to operate. No amount of growth in the region is sustainable without water, all other matters become superfluous without water to support the multiple and voracious needs of the spiraling population and to sustain the regional economy. Water for future years is a keystone regional issue, which cannot be address or solved by local specific development plans. The DEIR does not address this fundamental issue. It is requested that projections of out year water supplies and predicted water availability be provided for comparison and assessment.

5. The PEIR does not address the matter of solid waste processing and disposal. Solid waste disposal is a regional matter presently accomplished by private contractors who have, by some means, significantly raised the life expectancy the solid waste disposal sites. Regardless, the solid waste sites have a finite life expectancy that in most cases will mean at least 80% of the solid waste disposal sites in the region will be filled up before 2030. The whole question of solid waste disposal is a regional issue that will require large new disposal sites to be identified and acquired, or alternate methods of solid waste disposal to be developed before 2030. Local development site planning cannot resolve the solid waste disposal problem. Request specific data or programs that deals with the regional matter of solid waste disposal.
Letter W  Thomas Davis

W-1 This comment provides introductory remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

W-2 A main tenet of smart growth is that it provides people with housing and transportation choices that they do not currently have. Offered a choice, some people will still elect to move to Riverside and make the long commute. However, others will choose to live closer to their workplace, and they may or may not choose take public transit. Transportation modeling has long shown that given viable options, some number of people will prefer closer housing and/or public transit. The success of the Coaster is one local example.

W-3 An increase in population, housing, and density results in an increase in the applicability of alternative transportation options. SANDAG recognizes that it is preferable to have infrastructure developed at the same time as the demand, however, typically, the demand is created then the infrastructure is constructed to meet that demand. There is a limited amount of funding, so transportation needs must be prioritized.

W-4 The impacts of the Proposed Project on public services and utility systems were discussed in Section 5.12 of the EIR. As noted, implementation of the RCP would result in significant impacts to public services and utility systems, including water, wastewater facilities, schools, police and fire protection, and parks/recreation services. Mitigation measures are identified in Section 5.12.5 of the EIR to reduce these impacts to below a level of significance. These impacts as well as the proposed mitigation measures are also presented in Table 1.6-1 in the Executive Summary. It should also be noted that the RCP is an incentive based plan that does not assume additional units would be built in the region unless adequate public facilities can support the additional growth. The EIR analyzed scenarios that could result from implementation of the RCP, but it is recognized that to improve quality of life, infrastructure deficiencies need to be addresses. The RCP is meant to provide a framework to facilitate smart growth that makes sense and is appropriate.

The San Diego County Water Authority (SDCWA) has indicated in their comment letter that the Regional Water Facilities Master Plan is flexible enough to allow the sizing and timing of water facilities to be adjusted to meet the future demand, and the impact to water supply would be less than significant. Please see comment letter N from the SDCWA.

W-5 SANDAG understands that population growth will not stop in 2030. Population forecasts are periodically updated by SANDAG to consider current growth rates, housing construction, and job creation. Current population forecasts have been prepared for 2030. If the RCP is implemented, future census data will reflect the
increase in population, and this information will then be incorporated into future population forecasts and modeling.

Several factors go into population forecasting, and some of these factors are variable. Therefore, it is not particularly reliable to forecast beyond 25 years into the future. Planning past 2030 is too speculative. SANDAG updates the projects consistently, and the RTP is mandated to be updated every three years. SANDAG recognizes the growth between now and 2030, and the RCP provides a plan to accommodate that growth, in addition to the potentially captured units that are identified in the EIR. Additionally, the RCP provides a plan to improve the quality of life of residents in the San Diego region by considering environmental, social, economic, public services, and other factors which contribute to an improved quality of life.

W-6 The Regional Transportation Plan (RTP) – MOBILITY 2030 was analyzed in a separate EIR. The RTP and the Final RTP EIR were approved by the SANDAG Board in 2003.

The commenter has misidentified the number of units that are forecast to be developed in the region between now and 2030 with and without the RCP. As noted in Table 3.4-1 of the EIR. There are expected to be 255,065 new housing units constructed between now and 2030. If the RCP is implemented there could be additional units (46,000 were assumed as reasonable for purposes of analysis), for a total of 301,065 units. Therefore, if 10 vehicle trips (the vehicle trips used by the commenter) are assumed for each housing unit, then 460,000 additional trips would be added to the circulation network, not 3,016,400 trips as indicated in the comment. However, those trips would still be on our roadways. That portion of the population is included in our population projections as those who commute to jobs in this region but living outside the region due to limited capacity.

It is important to note that multi-family residential, which represent the majority of the product type expected to be developed with implementation of the RCP, has a lower vehicle trip generation than single-family. Depending on the density, and the specific multi-family product type (e.g., apartments or condos), the expected vehicle trip generation will be 6 to 8 trips per unit. This range is consistent with the SANDAG (Not So) Brief Guide to Vehicular Traffic Generation Rates for the San Diego Region.

The comment also fails to recognize that improvements are proposed to the regional transportation network, including the expansion of existing highways, the completion of regional highways that are currently proposed for construction, as well as the incorporation of HOV lanes. Additionally, transit options will be expanded to provide alternative modes of transportation. The transportation goals, objectives, and actions presented in Table 3.5-1 of the EIR further detail how these improvements will be achieved.
The housing units that are not captured within San Diego County would be located in Riverside, Orange, and Imperial counties, and northern Baja. They will draw power from the Western Electrical Power Grid with or without implementation of the RCP. From a regional power perspective, implementation of the RCP results in no change, rather, it will be a question of how available power is distributed among local providers.

The comment requests that the EIR provide specific electrical availability projects over the period addressed in the EIR and compare it to the projected electrical requirements of the proposed project. This analysis was not conducted because, as stated above, the location of the future residents, whether within San Diego County or the adjacent region, will still use the same power source.

Section 5.7 of the EIR analyzed energy and found that implementation of the RCP will result in a less than significant impact on renewable energy resources and a significant and unmitigated impact on non-renewable energy resources.

Water supply was addressed in Section 5.12 of the EIR. The EIR concluded that the impact to water facilities and water supply would be potentially significant and mitigable.

SANDAG and SDCWA have a memorandum of understanding that SDCWA will use the population forecasts from SANDAG for their future water planning efforts. If the RCP is approved, then SDCWA will add the additional population into their forecast, and that information will be used by SDCWA during their next water planning update. Comment letter N, 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 increase or decreases from the Year 2020 forecasts.”

Mitigation measure ServSys-1 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 this mitigation measures will reduce the potentially significant impact to water facilities and supplies to below a level of significance.

Solid waste disposal and landfills were addressed in Section 5.12 of the EIR. The Draft EIR concluded that the RCP would have a significant, but mitigated impact on solid waste services. As noted on page 5.12-16 of the Final EIR:

The increase in population associated with implementation of the RCP will result in an increase in the rate of waste going to the landfill. Since many of the local landfills will reach capacity during the lifetime of the RCP, this represents a significant impact. General population growth within San Diego County would require expansion of landfill facilities, but implementation of the RCP further increases the need for new or
expanded facilities. While this increase will further impact San Diego County service providers, it will result in proportionate reductions in impacts to Riverside, Orange, and Imperial counties and in Baja California. Implementation of mitigation measures ServSys-1 and ServSys-3 will reduce these impacts to below a level of significance.
April 21, 2004  
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Mr. Rob Rundle  
SANDAG  
401 B Street, Suite 800  
San Diego, CA 92101

Dear Mr. Rundle,  
Following are comments regarding the Draft Program Environmental Impact Report.  
Only the sections of interest were perused; so comments are restricted to those portions. Grammatical and spelling matters are presented at the end.

Page 1-2. Last sentence. What does “fairness and equity” mean? To what does it apply?

Page 1-8, ¶ 2. There’s that “fairness and equity” again. What does it mean here?

Page 1-13, ¶ 3. “Therefore, implementation of the RCP is growth inducing.” Is a matter of opinion and is out of place here.

Page 1-20. Mitigation Measures: acoustical barriers are not effective because of their frequency response characteristics.

Page 2-7.  
Transportation: “Public transit is ineffective and time consuming” because it is archaic and lacks marketability features – not one.  
Urban Form: “Second dwelling units are undesirable. Not necessarily so.

Page 2-9. Table should include Knowledgeable Citizens.

Page 3-1, ¶ 2. “New ‘bedroom communities’ being developed far from major employment centers” is traditional Planning procedure. That has gotten us into this bind.

Page 3-1, ¶ 3. How does this “impede economic growth”? Growth has been typical over the years.

Page 3-2, ¶ 2. (4) coordinate these revitalization efforts with our long-term mobility needs. Everything SANDAG has done this far is based on tradition, not modern technology.

Page 3-2, ¶ 3. “takes into consideration the future transportation system planned in the RTP”. Nothing here is based on the future, only the past. And most are failing now.

Page 3-2, ¶ 4. Virtually no “local elected officials” have a technical background. Thus they cannot determine satisfactory solutions. In truth, the same is true of all the agencies and organizations mentioned in this paragraph. That is clearly evident.

Page 3-3, ¶ 2. Broad Public Involvement  
Virtually none of the categories listed have technical or business expertise. This is a political solution, not practical.

Page 3-3, ¶ 3. “helped identify issues of importance” does no provide modern, productive solutions.

Page 3-4, ¶ 4. The entire paragraph is a planning concept, not a customer’s perception.
Page 3-4, ¶ 5. There are those buzz words "fairness and equity" again. What do they mean?

**Transportation**

"4. Develop a network of fast, convenient, high-quality transit services that are competitive with the cost and time to drive alone during peak periods." Government has no such arrangement.

**Economic Prosperity**

"Ensure a rising standard of living for all of our residents." Only the private sector can perform this.

**Borders: Transportation**

Provide reliable and efficient transportation systems associated with key trade corridors, interregional commuting corridors, tribal reservations, and ports of entry". Include economic, and you have what we have now.

Page 5.4-9, ¶ 2. This paragraph is devoted solely to operator's concepts. Nothing shows any recognition of the consumer's interest. And that is the damning characteristic of all mass transit!

**Spelling & Grammatical Errors**

Page 1-3, ¶ 1. For clarity, replace "implementation actions" with "implements".

Page 1-7, ¶ 1. "Contribute" needs an "s".

Page 1-10, ¶ 3. "Alternative" needs and "s".

Page 1-12, ¶ 2. Fifth line: "an" should be "and".

Page 1-13, ¶ 2. "of" should be "or".

Page 1-16, ¶ 1. Fifth line: "area" is superfluous.

Page 2-6. Notes: 2, Third line: "from" should be "for".

Page 2-8, ¶ 3. "of" should be "if".

Page 3-7, ¶ 3. In the fifth line from the bottom, The verb "is" is required to go with the subject "increase".

That concludes my review.

Robert J. Hoffman
Letter X Robert J. Hoffman

X-1 This comment provides introductory remarks. This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

X-2 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

Achieving fairness and equity in the planning process is one of the goals of the RCP. Chapter 6 of the Draft RCP addresses Social Equity and Environmental Justice. As per the RCP planning document:

“Social equity means ensuring that all communities are treated fairly and are given equal opportunities to participate in the planning and decision-making process, with an emphasis on ensuring that traditionally disadvantaged groups are not left behind. These groups include, but are not limited to, ethnic minorities, low income residents, persons with disabilities, and seniors. Social equity means everyone, regardless of race, cultural, ability, or income, shares in the benefits of planning and development.”

X-3 Please see response to comment X-2.

X-4 CEQA Guidelines Section 15126.2(d) requires a discussion of how a proposed project could foster economic or population growth, or the construction of additional housing. Since the RCP could increase the number of housing units within the Smart Growth Opportunity Areas (SGOA) or other areas where compact, efficient and environmentally sensitive patterns of development would be feasible, the project is growth inducing. Section 1.0 of the EIR includes a summary of the findings of the EIR; thus, since the EIR concluded that the project would meet the definitions of growth inducing, it is appropriate that this section summarize that conclusion.

X-5 Mitigation measure Noise-4 states that careful siting of facilities and the use of noise-reducing berms, walls, or other barriers shall be used to reduce noise and vibration impacts.

The ability of acoustical barriers to provide noise reduction depends upon the frequency of the sound wave. High frequency waves are very well attenuated,
where as low frequency waves are more easily bent over the top of the barrier and are reduced less effectively. The use and ability of acoustical barriers to achieve a suitable reduction in noise levels would be determined during subsequent environmental review, in compliance with CEQA, for future development projects.

Noise barriers are only one means to attenuate sound, but rather, are presented as an option. Other measures, such as architectural treatments, and distance separation from source and receptor are also suitable technique to attenuate noise. Mitigation measure Noise-4 recognizes that careful siting is an important component of the mitigation. Architectural treatments are addressed in mitigation measure Noise-5.

X-6 The points of controversy identified in Table 2.5-1 summarize issues raised during nearly 40 public workshops that were held by SANDAG during the drafting of the RCP. By definition, since these issues are controversial, there may be conflicting opinions. Some of these issues address components of the RCP, while others address the physical change associated with implementation of the RCP. Those issues addressing physical change (i.e., environmental) are addressed in the EIR.

X-7 It is unclear which table the commenter is referring to. There is no table on page 2-9 of the Draft EIR. However, the list of agencies presented on pages 2.8 and 2-9 are those agencies that may have legal responsibilities associated with the RCP, or that implementation of the project may have some effect on their legal mandates. Since individual citizens do not have identified responsibility in this context, a list of citizens would not be appropriate in this section.

X-8 This comment refers to an introductory paragraph on the project background. The statement regarding the location of new bedroom communities in relation to employment centers was meant to identify the connection between this type of development and the increase in traffic congestion and commute times, and the loss of open space. The RCP has acknowledged that the “disconnect” between housing and employment, as well as other land use decisions, has resulted in numerous environmental issues.

The RCP is meant to increase the amount of housing opportunities near employment centers, and along transportation corridors, thereby providing an overall improvement to the circulation network.

X-9 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the
The concern is that should the current land use planning be mandated as status quo, economic growth in the region will be impeded because: 1) people working in the San Diego region will be unable to afford housing; 2) are unwilling to commute long distances; 3) employers will have a difficult time attracting good/skilled employees and will move out of the region to be near the employment market.

X-10 This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

X-11 It is unclear what, exactly, the commentor is suggesting. The RCP is a planning guidance document that identified locations for future growth and an increased density of development. The locations identified are along existing and future transportation networks.

Section 5.4 of the Draft EIR identified the current Level of Service on the existing regional roadway system, and also analyzed the traffic impacts associated with implementation of the RCP. SANDAG and other regional transportation agencies recognize that the current transportation network will not meet the needs of the future growth based upon population projections for free flowing services. Thus, SANDAG has evaluated the opportunities and constraints and provided the RCP as one of the tools to fix the problem.

X-12 As indicated on page 3-2 of the Draft EIR, in addition to local elected officials, the committee also includes a number of advisory members, including California Department of Transportation (Caltrans), the San Diego Unified Port District, the Department of Defense, local transit agencies, the San Diego County Water Authority, and representatives from two SANDAG working groups: the Regional Planning Technical Working Group (TWG), made up of the region's planning and community development directors, and the Regional Planning Stakeholders Working Group (SWG), composed of community stakeholders from throughout the region. SANDAG's Borders Committee and Transportation Committee also provided input on key parts of the RCP.

X-13 This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

X-14 This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.
This comment does not raise environmental issues. The comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

Please see response to comment X-2.

The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

The commenter is identifying one of the transportation goals identified in the RCP. What follows in the table are the specific policy objectives and actions necessary to reach that goal. These objectives and actions will occur gradually with implementation of the RCP.

The commenter is identifying the economic prosperity goal identified in the RCP. What follows in the table are the specific policy objectives and actions necessary to reach that goal. These objectives and actions will occur gradually with implementation of the RCP. The private sector does not operate in a vacuum; decisions made in the public sector are inextricably linked to the private sector.

The commenter is identifying one of the Border Transportation goals identified in the RCP. What follows in the table are the specific policy objectives and actions
necessary to reach that goal. These objectives and actions will occur gradually with implementation of the RCP. All of the goals are linked to economic feasibility. If a measure is not feasible to implement from an economic perspective, it will not be implemented.

X-20 The comment raises an issue about the proposed RCP, not about the environmental information or conclusions in the EIR. Section 15088(a) of the CEQA Guidelines only requires that a lead agency prepare responses to those comments that address environmental issues. Since this comment does not address an environmental issue, no response is required. However, SANDAG has provided the following response to address the policy issue. Additionally, the comment will be forwarded to the decision makers for their consideration prior to considering the Proposed Project.

The RTV recognizes that for mass transit to be effective it must meet the needs of the public. As such, transit must be located in proximity to the customers (i.e., integrate transit into the more populated urban communities). Additionally, transit should not cause impacts to the local community (i.e., surrounding public transit with supportive land uses). To be competitive with individual driving alone in vehicles, transit needs to get the customer to the destination quickly, thus it is a priority that transit bypass congested areas.

X-21 This comment identified minor spelling and grammatical errors in the document. The recommended changes have been incorporated, with the exception of pages 1-3, 1-16, 2-6, and 2-8. The changes do not affect the adequacy or conclusions in the EIR.
May 13, 2004

SANDAG
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COMMENTS ON DRAFT PROGRAM EIR
for the REGIONAL COMPREHENSIVE PLAN

As concerned citizens, we cannot support the draft Regional Comprehensive Plan, nor the Draft Program Environmental Impact Report.

The plan aims to limit sprawl and to reduce the number of people working in the San Diego region who live in other regions. These are laudable goals, but there is no substantial evidence documented in the DEIR that would indicate the RCP will meet these goals.

On the contrary, the RCP’s proposal to deliberately add 46,000 homes and 100,640 people is shocking, and seems certain to add to the region’s problems. We must consider that the region already has a huge challenge if we carry out plans that would add 882,000 people to the region between 2004 and 2030. To intentionally add 100,640 residents on top of this would compound every major problem that we currently face, and would add to the burdens we will have to face under existing development plans.

Substantial work has gone into current general plans, and an attempt to alter these plans to add more development is unsound.

There is no evidence that the RCP can prevent growth in outlying areas. Nor is there evidence that adding compact homes in the San Diego region will prevent people from driving to Riverside, for example, to buy a larger detached home.

We cannot continue to add industrial parks in North County and South Bay/ Otay Mesa, then lament that workers are driving to Riverside County and northern Mexico to live.

The DEIR is sorely deficient in analysis of habitat, water resources, biological and historical resources.
The final EIR should include alternatives that combines some of the goals of the RCP, but leave out the growth inducing components, and add increased protections for water resources, biological & historical resources, and open space.

Kathleen Blavatt  
Save Our NTC*

Kasey Cinciarelli

Mary H. Clarke  
Co-Chair, Friends of Hedionda Creek

Jerry Harmon  
Former Mayor, Escondido*

Kevin K. Johnson  
Johnson & Hanson LLP*

Stuart Hurlbert  
Professor of Biology  
San Diego State University*

Andy Mauro  
Director and Conservation Chair  
San Elijo Lagoon Conservancy and  
Buena Vista Audubon Society

Thomas G. Mullaney  
Friends of San Diego*

*Affiliations shown for identification purposes only
Letter Y Concerned Citizens

Y-1 SANDAG has reviewed the growth trends and modeled growth projections (jobs, housing and population). Based upon this modeling effort, it is projected that population growth of 1 million people will occur within the region. This growth projection includes both in migration and native births. This growth is anticipated to occur without any intervention by SANDAG or any of the local jurisdictions. The modeling has identified a deficit of approximately 93,000 homes where local general plans do not identify sufficient capacity. Typically, these units would be built outside the region, or “exported”. This export will occur if SANDAG and the local agencies implement the existing adopted General Plans. The additional 46,000 homes discussed in the RCP EIR is provided for analysis purposes and is not the stated goal of the RCP. The analysis in the EIR to “capture” these units is not designed to induce growth, but rather, to meet partially, the demands for growth within the region.

While it is true that some future residents will still choose to live in Riverside rather than San Diego County in order to obtain a single family detached unit at a lower cost, it does not follow that all future residents will choose to do so. In fact, smart growth strategies currently being implemented in downtown San Diego, where dwelling units are being sold even before construction is complete serve an example of effective implementation. It is also likely that some future residents will choose the areas that provide Smart Growth as a life style option.

Regarding the statement about adding industrial parks in North County and South Bay/Otay Mesa, the RCP does not call for adding additional industrial land uses that are not already identified in the existing land use plan. The RCP focuses on providing additional housing opportunities for future residents.

Y-2 Due to the scope and breadth of the project, the RCP has been analyzed at the program level. More detailed analysis of specific issue areas will be conducted at the project level as specific development projects are proposed. Because the RCP is predominantly a set of goals and policies, the location of future development cannot be ascertained until each local jurisdiction reviews site specific constraints and determines ways to implement the RCP. Until the phase of implementation, site specific impacts cannot be quantified.

At the program level, the EIR has addressed habitat (Section 5.10), water supply (Section 5.12), biological resources (Section 5.10), and historical resources (Section 5.11). The EIR concluded that implementation of the RCP would result in significant and unmitigated impacts to habitat/biological resources; a less than significant impact to water supply; and a significant and unmitigated impact to historical resources. Thus, pursuant to State CEQA Guidelines Section 15146, the degree of specificity required in the EIR corresponds to the degree of specificity involved in the project. CEQA also required that environmental analysis should be conducted as early as feasible to ensure that environmental issues are incorporated into the project (Section 15004(b)(1)).

Y-3 The RCP is a long-term plan that aims to increase mobility and transportation choices, increase housing choices, and protect the environment, enhancing the
quality of life in the region. It is not designed as a growth inducement project but rather, a comprehensive plan to adequately meet the housing needs of people living and working in the region through 2030. Implementation of the RCP will serve to preserve water, biological, historical, and open space resources to a greater degree than other alternatives by concentrating development near transportation corridors. This concentration near transportation corridors will limit the amount of natural habitat that is developed. If the goals and objectives of the RCP are implemented, but only to the extent of supporting growth to the level planned for in existing General Plans, then additional excess population would still be exported to surrounding counties and northern Baja, resulting in more long-distance commute trips, higher vehicle miles traveled (VMT), and more air pollution. This would not meet the goals and objectives of the RCP.
-----Original Message-----
From: wallace tucker [mailto:wktucker@znet.com]
Sent: Thursday, May 13, 2004 10:27 PM
To: Gregor, Carolina
Subject: draft eir

Hi Carolina,

I have the following comments on the draft EIR for the RCP:

1. The definition of smart growth should contain an explicit statement linking the increase in density in urban areas to the permanent protection of open space in urban and rural areas.
2. The plan itself does not contain sufficient incentives for the protection of agricultural, natural and community open spaces.

Thanks,
Wallace Tucker
Letter Z  Wallace Tucker

Z-1 The definition of smart growth included in the RCP and the EIR has been revised to reflect the comment. The revised definition is provided below:

Smart growth is a compact, efficient and environmentally-sensitive pattern of development that provides people with additional travel, housing and employment choices by focusing future growth away from rural areas and closer to existing and planned job centers and public facilities, while preserving open space and natural resources. Smart growth both complements and encourages sustainability.

Z-2 The RCP will serve to protect agricultural, natural, and community open spaces by concentrating development around existing transportation corridors. This concentration will prevent some existing agricultural, natural, and community open spaces from being developed. The RCP includes goals, objectives and policies related to agriculture, natural open space, and community open space. However, SANDAG does not have the authority to make other jurisdictions set aside agricultural, natural, and community open spaces. These spaces will have to be preserved by individual jurisdictions.

For example, the RCP has a specific policy objective to protect agricultural areas, natural systems, high-value habitat areas (as reflected in adopted habitat plan), and other open-space areas that define the character of a community. Another policy objective calls for the preservation and maintenance of natural biological communities and native species in the region.
APPENDIX C

Mitigation, Monitoring, and Reporting Program
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<tr>
<td>Significant conflict with the land use planning documents for several jurisdictions in the San Diego region. These documents include general plans, Local Coastal Programs, and the Port Master Plan.</td>
<td>LU-1: Local jurisdictions shall adopt land use plan amendments, including general plan amendments, local coastal program amendments and an amendment to the Port Master Plan to eliminate inconsistencies between future land uses and densities identified in these plans, compared to future land uses and densities identified in the RCP.</td>
<td>LU-1: Jurisdictions to approve land use plan amendments consistent with mitigation measure LU-1.</td>
<td>LU-1: During next land use plan update, or as individual projects are approved that have a higher density.</td>
<td>LU-1: Jurisdictions with land use authority.</td>
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<td>Significant impacts from conversion of undisturbed vacant land, agricultural land, open space and other natural resources to urban uses from a plan-to-ground perspective. From a plan-to-plan perspective, implementation of the RCP would reduce the amount of land used to accommodate the same population levels. This would be a beneficial effect. While implementation of the RCP would result in less conversion of open space land than would occur without the RCP, it would result in some unavoidable impacts to these resources.</td>
<td>LU-2: Local jurisdictions shall discourage conversion of agricultural lands outside of planned urbanized areas. Where proposed development significantly conflicts with established agricultural operations appropriate buffers or other appropriate measures shall be incorporated to reduce land use incompatibility impacts to below a level of significance.</td>
<td>LU-2: Jurisdictions shall review current policies on agricultural preservation, if applicable, and modify these policies to reflect the requirements of mitigation measures LU2.</td>
<td>LU-2: During next land use plan update, or as applications for individual projects driven by the RCP are submitted.</td>
<td>LU-2: Local jurisdictions with land use authority and agricultural lands within their boundary.</td>
</tr>
<tr>
<td>Significant indirect impact to lands currently under mineral resource extraction that fall within the identified SGOA. These resource extraction area lands may realize a better and higher use with implementation of the RCP.</td>
<td>LU-3: Local jurisdictions shall discourage conversion of MRZ-2 lands until the existing mineral resources on that land have been exhausted, or are no longer economically feasible to process or market.</td>
<td>LU-3: Jurisdictions shall review current policies on mineral resource preservation, if applicable, and modify these policies to reflect the requirements of mitigation measures LU3.</td>
<td>LU-3: During next land use plan/resource plan update, or as applications for individual projects driven by the RCP are submitted.</td>
<td>LU-3: Local jurisdictions with land use authority that have MRZ-2 land within their boundaries.</td>
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<tr>
<td>Development may occur that is</td>
<td>LU-4: Project-level noise impact analysis</td>
<td>LU-4: Jurisdictions to perform project-level noise impact analysis.</td>
<td>LU-4: Noise impact</td>
<td>LU-4: Local jurisdictions with land use authority.</td>
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### Impact Monitoring and Reporting Program

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<td>incompatible with existing development or land uses. Higher densities can result in the location of incompatible land uses, or result in increased noise conditions.</td>
<td>shall be performed, where appropriate, to ensure that changes in land uses and densities do not result in significant noise conflicts or impacts. Noise mitigation measures recommended in these analyses shall be implemented that reduce impacts associated with land use incompatibility to the levels established by each jurisdiction for the appropriate land use. LU-5: An Urban Design Best Practices manual shall be prepared by SANDAG to establish site-specific measures to reduce land use incompatibilities (divide an established community, noise, hazards, lighting, objectionable odors, or other operational activities).</td>
<td>review noise impact analyses and oversee implementation of any identified noise mitigation measures. LU-5: SANDAG to prepare, approve, and distribute manual.</td>
<td>analysis review shall occur concurrent with CEQA review for the project. The timing for implementation of identified noise mitigation measures is dependent on the identified measures. LU-5: SANDAG shall prepare the manual within four years of approval of the RCP.</td>
<td>Jurisdictions are responsible for the requirements of a noise impact analysis from future project applicants. LU-5: SANDAG will be responsible for the preparation, approval and distribution of the best management practices manual.</td>
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<td>Physical division of an established community through creation of multiple nodes in areas where one node exists. This represents a significant impact.</td>
<td>LU-5: (see above).</td>
<td>LU-5: SANDAG to prepare, approve, and distribute manual.</td>
<td>LU-5: SANDAG shall prepare the manual within four years of approval of the RCP.</td>
<td>LU-5: SANDAG</td>
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### Visual Resources

<p>| Future development along identified and eligible scenic highway corridors could include buildings which are visible from the highway, and are out of scale with the surrounding built environment. | Vis-1: Design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design projects to minimize their intrusion into important view sheds and use contour grading to better match surrounding terrain. Vis-2: Use natural landscaping to minimize contrasts between the project and surrounding built environment. | Vis-1 through Vis-5: Jurisdiction to review project plans for incorporation of recommended design measures. | Vis-1 through Vis-5: During project design and review. | Vis-1 through Vis-5: Jurisdictions are responsible for these design requirements, when applicable, from future project applicants. |</p>
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<td>surrounding areas. Develop interchanges and transit lines at the grade of the surrounding land to limit view blockage. Contour the edges of major cut and fill slopes to provide a more natural looking finished profile. Vis-3: Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear travel experience that would otherwise occur. Vis-4: Replace and renew landscaping along corridors with road widening, interchange projects, and related improvements. Plan landscaping in new corridors to respect existing natural and man-made features to complement the dominant landscaping of surrounding areas. Vis-5: Construct sound walls of materials whose color and texture complements the surrounding landscape and development. Use color, texture, and alternating facades to “break up” large facades and provide visual interest.</td>
<td>Vis-1: (see above).</td>
<td>Vis-1: (see above).</td>
<td>Vis-1: (see above).</td>
<td>Vis-1: (see above).</td>
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<td>Increased density in existing neighborhoods may result in buildings that are of different bulk and scale than existing structures. Depending on the buildings’ location and design, the construction of larger buildings within an already established community would result in a significant visual resource impact.</td>
<td></td>
<td>Vis-1: (see above).</td>
<td>Vis-1: (see above).</td>
<td>Vis-1: (see above).</td>
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<td>Depending on the location and height of future development adjacent to oceans or bays, the potential exists that public views to these scenic resources may be substantially altered. This represents a significant visual resource impact.</td>
<td>Vis-1 through Vis-5: (see above). Vis-6: Future development adjacent to the ocean or bays that could potentially impact scenic vistas shall prepare visual simulations to determine what level of view impact the project will have on the scenic vista. Measures to reduce adverse impacts to view corridors shall be implemented. (e.g. reduce bulk and scale).</td>
<td>Vis-1 through Vis-5: (see above). Vis-6: Jurisdictions to review visual simulations and oversee implementation of any identified visual quality mitigation measures.</td>
<td>Vis-1 through Vis-5: (see above). Vis-6: During project review.</td>
<td>Vis-1 through Vis-5: (see above). Vis-6: Local jurisdiction.</td>
</tr>
<tr>
<td>Future development in the region, over the lifetime of the RCP, will result in regionally increase in the amount of light pollution. This represents a significant visual resource impact.</td>
<td>Vis-7: Incorporate design measures into the Urban Design Best Practices Manual to reduce glare and lighting impacts to observatories. This shall include regulations for shielding, intensities of lighting (number of lights, lumens, and wavelengths).</td>
<td>Vis-7: SANDAG to prepare, approve, and distribute manual.</td>
<td>Vis-7: SANDAG shall prepare the manual within four years of approval of the RCP.</td>
<td>Vis-7: SANDAG</td>
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**Transportation/Circulation**

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<td>Significant transportation and circulation impacts on and localized roadways due to increased density.</td>
<td>Trans-1: Future development projects will be required to address localized traffic impacts as part of the environmental review process. Mitigation for these local impacts will be in conformance with the adopted policies of the lead jurisdiction. Mitigation measures shall include congestion management strategies identified in Table 1 (included at the end of this MMRP).</td>
<td>Trans-1: Jurisdictions to review traffic impact analyses and oversee implementation of any identified traffic mitigation measures. Jurisdiction shall also ensure that strategies from the Toolbox are being used.</td>
<td>Trans-1: Traffic impact analysis review shall occur concurrent with CEQA review for the project. The timing for implementation of identified traffic mitigation is dependent on the identified measures.</td>
<td>Trans-1: Jurisdictions shall ensure that project applicants submit traffic impact analyses and that these studies incorporate recommended mitigation in the CMS Toolbox.</td>
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<tr>
<td>Potential significant conflict with the Circulation Elements for several jurisdictions in the San Diego region.</td>
<td>Trans-2: Local jurisdictions shall adopt Circulation Element amendments to eliminate inconsistencies related to future roadway and intersection improvements</td>
<td>Trans-2: Jurisdictions to approve circulation element amendments consistent with</td>
<td>Trans-2: During next general plan update, or as individual conflicts arise.</td>
<td>Trans-2: Jurisdictions with land use authority.</td>
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### Mitigation Monitoring and Reporting Program

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<td>associated with the RCP.</td>
<td>Mitigation Measure Trans-2.</td>
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#### Air Quality

Construction activities could significantly impact the region’s air quality with NOx emissions released from construction equipment, PM$_{10}$ emissions related to grading and earth moving activities, and increased vehicle trips by construction workers traveling to and from construction sites.

| Air-1: For projects that exceed daily construction emissions established by SDAPCD, Best Available Control Measures (BACMs) shall be incorporated to reduce construction emissions to below daily emission standards established by SDAPCD. Appropriate BACMs will be determined on a project by project basis, and are specific to the pollutant for which the daily threshold has been exceeded. BACMs that may be appropriate for construction activities that exceed daily ROG thresholds include using precoated building materials, using high pressure/low volume paint applicators, and using lower volatility paint. BACMs that may be appropriate for construction activities that exceed daily CO, NO$_x$ or SO$_x$ thresholds include phasing of construction activities. |
| Air-1: Jurisdictions to review grading plans to ensure project is properly phased to meet the daily emission thresholds set by the APCD. |
| Air-1: During project review. |
| Air-1: Jurisdictions are responsible for conditioning future projects so that daily construction emissions are below daily standards set by the APCD. |

Increased density could increase the volume of traffic flow at some existing intersections which could potentially increase the number of vehicles that are idling at roadway intersections releasing emissions and causing CO concentrations to exceed state and federal standards. This could expose sensitive receptors to localized hot spots, creating a significant air quality impact.

| Trans-1: (see above). |
| Trans-1: See above. |
| Trans-1 See above. |
| Trans-1 See above. |

#### Noise

Transportation improvements associated with the RTP (which is the transportation

| Noise-1: Site planning shall be conducted in a manner that avoids impacts to noise |
| Noise-1: Jurisdictions to review site |
| Noise-1: During the application phase of |
| Noise-5: Jurisdictions |

Regional Comprehensive Plan MMRP
Mitigation Monitoring and Reporting Program

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<td>An increase in the number of trucks, buses, and trains could increase noise generation per vehicle. Furthermore, decreasing congestion would allow vehicular traffic on freeways and major arterials to move faster, increasing the noise produced by traffic in that corridor. Proposing new receptors in the noise impact zone would result in significant impacts.</td>
<td>Sensitive areas (e.g., residences, hospitals, schools, libraries) and sensitive receptors. Sensitive receptors include both humans and noise-sensitive wildlife species. Typical noise mitigation includes either provision of buffers or noise attenuation features. The distance between the noise source and the sensitive receptors shall be adequate to reduce noise levels to acceptable levels (CNEL identified in local land use plan for humans, or generally accepted dBA for wildlife species) or other noise attenuation techniques, such as sound walls or landscaping may be used to reduce noise impacts to levels that are consistent with the local jurisdiction’s requirements. Noise-2: Land use measures such as zoning designations shall be adopted for future development on land adjacent to transportation facilities to avoid noise and vibration impacts. Noise-3: Where other methods are impractical, operational constraints shall be imposed (e.g., limits on vehicle speed, regulation of train horns). Operational constraints shall reduce the noise to the levels established by each jurisdiction for the appropriate land use. Noise-4: Avoid noise and vibration impacts by the careful siting of facilities and the use of noise-reducing berms, walls, or other barriers as deemed appropriate by local lead agency.</td>
<td>development plans and ensure that requirements set forth in mitigation measure Noise-1 are met. Noise-2: Jurisdictions to identify and adopt land use measures that would minimize noise and vibration impacts. Noise-3: Jurisdictions to place recommended conditions on project. Noise-4: Jurisdictions to review site plans to ensure that requirements set forth in mitigation measures Noise-4 are met. Noise-5: Jurisdictions to review architectural treatment plans for the use of sound-proofing strategies, where appropriate.</td>
<td>future projects. Noise-2: During future land use plan updates. Noise-3: Placed as a condition of project approval during project design and approval stage. Noise-4: During project design phase. Noise-5: Jurisdictions to verify use of treatments in project design.</td>
<td>approving the project.</td>
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<td>Noise-5: Improve architectural treatment (sound-proofing) to reduce interior noise.</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
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<tr>
<td>High density areas will potentially be subjected to elevated noise levels due to the proximity of dwelling units to transportation systems. This represents a significant impact.</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
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<tr>
<td>Developments that take place within the noise contours of existing airports would have a significant impact as a result of their location.</td>
<td>Noise-1, Noise-2, and Noise-5: (see above). Noise-6: Future development projects that are located in the vicinity of regional airports shall consider noise mitigation conditions recommended in the appropriate airport Comprehensive Land Use Plan.</td>
<td>Noise-1, Noise-2, and Noise-5: (see above).</td>
<td>Noise-1, Noise-2, and Noise-5: (see above).</td>
<td>Noise-1, Noise-2, and Noise-5: (see above).</td>
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<td>Increases in rail traffic could lead to more train horns or whistles at crossings near residential areas, which can be a source of annoyance, especially at night or in early morning or evening. Proposing new receptors in the noise impact zone would result in significant noise impacts.</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
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<td>Increased intermodal transportation of goods would result in a subsequent increase in noise and vibration in areas adjacent to rail corridors. Additional localized impacts could occur as a result of construction activities (e.g., pile driving) or rail activities. Proposing new receptors in the noise impact zone would result in significant noise impacts.</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
<td>Noise-1 through Noise-5: (see above).</td>
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**Geology/Paleontology**
### Impact Mitigation Measure Action Timing Responsibility

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<td>The implementation of the RCP would result in development occurring within geologic formations with moderate to high paleontological resource potential. This represents a significant impact.</td>
<td>Paleo-1: When a construction activity will significantly disturb the unweathered bedrock in areas identified as having a moderate or high potential to support paleontological resources, a qualified researcher must be stationed on site to observe grading operations and recover scientifically valuable specimens. A certified paleontologist shall be retained (or required to be retained) by the project implementing agency prior to construction to establish procedures for surveillance and pre-construction salvage of exposed resources if fossil-bearing rock have the potential to be impacted. The monitor shall provide pre-construction coordination with contractors, oversee original cutting in previously undisturbed areas of sensitive formations, halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, and oversee fossil salvage operations and reporting. This measure shall be placed as a condition on all grading plans where grading is proposed in geologic units defined as having a moderate or high potential for containing fossils.</td>
<td>Paleo-1: Jurisdictions to require paleontological monitoring, when applicable, as a condition of project approval. The monitor shall submit a report to the jurisdiction summarizing the monitoring and findings, if any.</td>
<td>Paleo-1: Monitor shall be present during the trenching and grading portions of the project construction.</td>
<td>Paleo-1: Jurisdictions approving the project.</td>
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### Hydrology/Water Quality

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<td>Future development cause erosion due to exposed graded surfaces, excavation, stock piling, or boring, and would potentially contribute to the sediment load in surface waters, potentially creating significant impacts.</td>
<td>Water-1: In areas where habitat for fish and other wildlife would be threatened by development, alternate drainage ways shall be sought to protect sensitive fish and wildlife populations. Heavy-duty sweepers, with disposal of collected debris in sanitary landfills, shall be used to effectively reduce annual pollutant loads.</td>
<td>Water-1: Jurisdictions shall review engineering and drainage plans. Post-construction maintenance activities would be written in as project</td>
<td>Water-1: Alternate drainageway would be identified during project design. Collection of debris, cleaning and of catch basins, and cleaning of storm drains would</td>
<td>Water-1: Project applicant and jurisdiction. Water-2: Future project applicants and the jurisdiction approving the project.</td>
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### Impact Mitigation Measure Action Timing Responsibility

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<td>Catch basins and storm drains shall be cleaned and maintained on a regular basis. Water-2: Development shall be designed to incorporate storm water improvements, both off and on site, that are implemented concurrently with the additional impacts created by developments associated with the RCP.</td>
<td>conditions/mitigation measures by the jurisdiction approving the project. Water-2: Jurisdictions to review drainage plans.</td>
<td>occur post-construction.</td>
<td>Water-2: During project design and review.</td>
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<td>Future development would result in increased impervious surfaces that would allow pollutants to accumulate on paved surfaces that would be flushed down storm drains and into the aquatic environment (i.e., lagoons rivers, and lakes). This would constitute a significant impact.</td>
<td>Water-1 and Water-2: (see above).</td>
<td>Water-1 and Water-2: (see above).</td>
<td>Water-1 and Water-2: (see above).</td>
<td>Water-1 and Water-2: (see above).</td>
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<td>Increased demand for ground water resources created by implementation of the RCP could significantly impact existing ground water resources.</td>
<td>Water-3: Project proponents would be required to employ measures that may include decreasing water demand for the project or reducing water use elsewhere in the same groundwater basin as determined by the local agency. Water districts relying upon groundwater may incorporate ground water recharge or other types of safe yield strategies to maintain adequate groundwater table elevations.</td>
<td>Water-3: Jurisdictions to review and monitor all discretionary actions that propose groundwater withdrawal to determine if significant impacts would occur.</td>
<td>Water-3: During project design and review.</td>
<td>Water-3: Local jurisdictions and water districts.</td>
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<td>Increased runoff resulting from development projects could overwhelm the existing local stormwater drainage systems. This is a significant impact that will require mitigation at the project level.</td>
<td>Water-1 and Water-2: (see above).</td>
<td>Water-1 and Water-2: (see above).</td>
<td>Water-1 and Water-2: (see above).</td>
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### Biological Resources

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<td>Future growth, including transportation</td>
<td>Bio-1: Design development projects to</td>
<td>Bio-1 and Bio-2:</td>
<td>Bio-1 and Bio-2:</td>
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Mitigation Monitoring and Reporting Program

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<td>projects, could potentially result in an impediment to regional wildlife movement due to habitat fragmentation; however, these regional impacts could be avoided through conditions required in adopted subarea plans. Local wildlife corridors would be affected by future growth that would not necessarily be avoided through the subarea plans. This represents a significant impact.</td>
<td>minimize or eliminate impacts to natural habitats and known sensitive resources. Development within large contiguous areas of habitat shall be minimized to reduce fragmentation of remaining habitat areas.</td>
<td>Jurisdiction to review development plans for consistency with criteria identified in Bio-1 and Bio-2.</td>
<td>During project design.</td>
<td>Project applicant and jurisdiction approving project.</td>
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<td>Bio-2: For development projects, provide for continued movement of ground-level wildlife across rights-of-way, where the project or regional conservation plan has identified wildlife corridors through the use of appropriately-sized bridges or other openings where roads or transit features would create barriers.</td>
<td>Bio-3: Jurisdictions to review mitigation plans for consistency with Bio-3.</td>
<td>Bio-3: During project review.</td>
<td>Bio-3: Project applicant and jurisdiction approving project.</td>
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<tr>
<td>Bio-3: Biological mitigation shall be directed to areas that are proposed for conservation and that support similar or higher value habitat. These efforts shall be coordinated with resource agencies and regional habitat conservation and planning efforts.</td>
<td>Bio-4 and Bio-5: Jurisdictions to review the project development plans and make recommendations to minimize impacts to oak woodlands, vernal pools, estuaries, lagoons, native vegetation, riparian vegetation and other regionally significant biotic resources. Jurisdiction, along with the wildlife agencies will oversee mitigation for any loss of wetland habitat.</td>
<td>Bio-4, Bio-5, Bio-6, and Bio-7: During project design.</td>
<td>Bio-4 and Bio-5: Project applicant/jurisdiction approving the project/wildlife agencies.</td>
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<tr>
<td>Bio-4: Minimize impacts to oak woodlands, vernal pools, estuaries, lagoons, and other regionally significant biotic resources; where unavoidable, replace with equal or better quality habitat to ensure no net loss of the resources.</td>
<td>Bio-6: Jurisdictions shall not approve projects that occur within identified open space preserves.</td>
<td>Bio-8: During project review/ as part of MMRP prepared during environmental review for the project.</td>
<td>Bio-6: Local jurisdiction/wildlife agencies.</td>
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<tr>
<td>Bio-5: Site development to minimize alteration of streambeds and associated riparian vegetation; where unavoidable, replace with like quality or better habitat at a ratio required by regulatory agencies with the goal of no net loss to wetlands.</td>
<td>Bio-7: Project applicant/Local jurisdiction approving the project.</td>
<td>Bio-9: During design of drainage system/project plan review.</td>
<td>Bio-7: Project applicant/Local jurisdiction approving the project.</td>
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<tr>
<td>Bio-6: Local jurisdiction/wildlife agencies.</td>
<td>Bio-8: Project applicant and jurisdiction approving the project.</td>
<td>Jurisdiction approving the project.</td>
<td>Bio-9: Jurisdiction approving the project.</td>
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<td>Impact</td>
<td>Mitigation Measure</td>
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<td>Bio-6: Preserve open space areas identified in local, state and federal plans. Bio-7: Limit the disturbance to native vegetation to the extent practicable. Revegetate with native plants where appropriate, and, when possible, locate construction staging areas in previously disturbed areas. Bio-8: Schedule the construction of projects to avoid impacts to wildlife (e.g., avoid breeding season for sensitive species) to the extent practicable. Project-specific review shall define specific mitigation measures, such as berms and sound walls, which would reduce construction and operational noise to within regulatory standards. Bio-9: Use appropriate water pollution control technology and best management practices to minimize or eliminate impacts to downstream aquatic systems.</td>
<td>Bio-7: Jurisdictions to review the project development plans and make recommendations to minimize impacts to native vegetation. Jurisdiction, along with the wildlife agencies will oversee mitigation for any loss of sensitive habitats. Bio-8: Jurisdiction shall condition future project whose construction could directly or indirectly impact wildlife on compliance with Mitigation Measure Bio-8. Bio-9: Jurisdictions to review development plans to ensure that appropriate water pollution control measures are incorporated.</td>
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<tr>
<td>Future water, sewer, and energy development projects are anticipated</td>
<td>Bio-1 through Bio-9: (see above).</td>
<td>Bio-1 through Bio-9: (see above).</td>
<td>Bio-1 through Bio-9: (see above).</td>
<td>Bio-1 through Bio-9: (see above).</td>
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<td>to have a significant impact on native vegetation, and may significantly</td>
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<td>impact regional and local wildlife movement corridors.</td>
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<td>Future water, sewer, and energy development projects are anticipated</td>
<td>Bio-1 through Bio-9: (see above).</td>
<td>Bio-1 through Bio-9: (see above).</td>
<td>Bio-1 through Bio-9: (see above).</td>
<td>Bio-1 through Bio-9: (see above).</td>
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<td>to have a significant impact on native vegetation, and may significantly</td>
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<td>impact regional and local wildlife movement corridors.</td>
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<td>Sand placement, as a means of shoreline preservation, can have a</td>
<td>Bio-10: Ensure that future coastal projects are sited and designed as to minimize</td>
<td>Bio-10: Jurisdictions to review development plan to insur...</td>
<td>Bio-10: Prior to project approval.</td>
<td>Bio-10: Local jurisdiction approving the project.</td>
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<td>significant effect on wildlife nurseries. SANDAG is currently monitoring</td>
<td>impacts to marine resources. Any unavoidable impacts to significant marine resources</td>
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<td>the effects of the regional beach sand project, and data indicate that</td>
<td>will be mitigated to below a level of significance in accordance with the...</td>
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<td>no long term adverse impacts to marine biological resources have</td>
<td>(e.g., CDFC, USFWS, NMFS).</td>
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<td>occurred since the project was completed.</td>
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<td>The development of seawater desalination facilities as a means of</td>
<td>Bio-10: (see above).</td>
<td>Bio-10: (see above).</td>
<td>Bio-10: (see above).</td>
<td>Bio-10: (see above).</td>
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<td>diversifying the regional water supply has the potential to significantly</td>
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<td>affect marine biological resources.</td>
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<td>Impacts to aquatic resources could be potentially significant; however,</td>
<td>Bio-9 and Bio-10: (see above).</td>
<td>Bio-10: (see above).</td>
<td>Bio-10: (see above).</td>
<td>Bio-10: (see above).</td>
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<td>through adherence to existing federal, state and local regulations</td>
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<td>(requiring no net loss) most of the impacts are considered reduced to</td>
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<td>below a level of significance. Some aquatic resources are not protected</td>
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<td>by existing federal, state and local regulations; thus, any impacts to</td>
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<td>those resources are significant.</td>
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<td>Reduction of the number of rare, endangered, sensitive and/or special</td>
<td>Bio-1 through Bio-10: (see above).</td>
<td>Bio-1 through Bio-10: (see above).</td>
<td>Bio-1 through Bio-10: (see above).</td>
<td>Bio-1 through Bio-10: (see above).</td>
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<td>status plants and animals; thus, these impacts are significant and unmitigated. Site avoidance of all impacts to rare or endangered species cannot be achieved in a regional plan. Because San Diego supports such a diversity of these resources, it is unavoidable that some individuals of some species would be lost as a result of providing housing and associated infrastructure.</td>
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<td><strong>Cultural Resources</strong></td>
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<tr>
<td>Due to the scale of the Propose Project, and the long history of Native American habitations in the region, future grading and construction activities are expected to result in significant impacts to archaeological and historical resources along the identified SGOA.</td>
<td>Cult-1: A review of literature and historic maps, a records search, and field survey to identify the presence or absence of cultural resources for each future development project shall be undertaken if the jurisdiction determines these studies are warranted. Prior to any development where possible impacts to significant cultural resources may occur, each cultural resource will need to be evaluated through testing programs to determine the significance/importance prior to determining mitigation of proposed impacts or providing recommendations for preservation. Historic resources may require analysis by a qualified historian or an architectural historian. Sites identified as significant/important will need to be avoided by development impacts or mitigated by completion of a data recovery program conducted in compliance with CEQA and agency guidelines. Site avoidance and preservation can include capping the site with gravel or construction fabric and 16 to 18 inches of sterile fill</td>
<td>Cult-1 and Cult-2: Jurisdictions to require cultural resource impact studies, when applicable, from future project applicants. Jurisdiction will review the study and oversee implementation of any identified cultural resource mitigation measures. Any resources that are recovered, identified, or destroyed shall be detailed in a report. Cult-3: Jurisdictions shall write curation in as a condition of project approval for any projects that will remove significant</td>
<td>Cult-1: During CEQA review for individual future projects. Cult-2: Upon preparation of next General Plan update. Cult-3: During identification of project conditions and mitigation measures (environmental review). Cult-4: SANDAG shall prepare the manual within four years of approval of the RCP. Cult-5: Upon preparation of next General Plan update. Cult-6: Prior to</td>
<td>Cult-1: Jurisdictions are responsible for the requirements of a cultural resources impact study, when applicable, from future project applicants. Cult-2: Local jurisdiction. Cult-3: Local jurisdiction. Cult-4: SANDAG will be responsible for the preparation, approval and distribution of the best management practices manual. Cult-5: Local jurisdictions. Cult-6: Project applicant and</td>
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<td>soil</td>
<td>Sites proposed for capping shall be indexed so future researchers have reasonable knowledge of the resources that have been protected. Capped sites can be landscaped with native, shallow rooted plants that are compatible with the surrounding biologic habitat. Passive uses for capped sites include trails, picnic and play areas, parking lots, and tennis or volleyball courts. A data recovery program for archaeological sites consists of excavation of a percentage of the site (determined in consultation with the local agency) to provide information necessary to answer significant research questions. Cult-2: Develop measures to provide maximum avoidance and minimization of significant archaeological and historical resources during development. Cult-3: For future development projects, lead agencies shall integrate curation of all archaeological and/or historical artifacts and associated records in a regional center focused on the care, management and use of archaeological collections. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. Curated materials shall be maintained with respect for cultures and available to future generations for research. Cult-4: Include a measure in the Urban Design Best Practices Manual requiring the integration of historical resources into archeological resources. Cult-4: SANDAG to prepare, approve, and distribute manual. Cult-5: Jurisdictions shall review current policies on historic preservation, if applicable and modify these policies to reflect the requirements of mitigation measure Cult-5. Cult-6: Project applicant will be required to retain qualified architectural historian to document the structure.</td>
<td>removal of any historic structures.</td>
<td>jurisdiction responsible for approving project.</td>
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### Mitigation Monitoring and Reporting Program

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<tr>
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<td>the design of future developments within the SGOA.</td>
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<td>Cult 5: Local jurisdictions shall develop measures to encourage adaptive reuse of existing historical structures within the SGOA.</td>
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<tr>
<td>Cult-6: Significant historic structures and buildings that will be demolished as a part of future projects will need to be documented by a qualified architectural historian. When local jurisdictions have more strict standards regarding the treatment of historic structures, the local jurisdiction’s policies shall be used.</td>
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<td>Future grading and construction activities could result in significant impacts to human remains.</td>
<td>Cult-1 through Cult-3: (see above).</td>
<td>Cult-1 through Cult-3: (see above).</td>
<td>Cult-1 through Cult-3: (see above).</td>
<td>Cult-1 through Cult-3: (see above).</td>
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### Public Services/Utility Systems

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<th>Responsibility</th>
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<tbody>
<tr>
<td>The increase in population may result in the need for new or expanded water facilities. This represents a significant impact.</td>
<td>ServSys-1: Water, sewer/wastewater, and landfill providers shall update plans to ensure adequate facilities are available to meet projected locations and intensities of growth. ServSys-2: Future construction shall incorporate water efficient appliances (e.g., low-flush toilets and shower heads) and xeriscaping and/or drought tolerant plant species.</td>
<td>ServSys-1: Local service providers shall update their plans to reflect future locations of intensified growth. ServSys-2: Local jurisdiction to condition projects to require water efficient appliances and xeriscaping.</td>
<td>ServSys-1: During next master plan update. ServSys-2: During plan review.</td>
<td>ServSys-1: Individual service provider. ServSys-2: Jurisdiction approving the project.</td>
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<td>Impact</td>
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<td>The increase in population may result in a significant impact on water supply</td>
<td>ServSys-1 and ServSys-2 (see above). ServSys-4: Future development projects will be required to prepare project-level environmental analyses, including an analysis of water supply and incorporate measures to reduce demand.</td>
<td>ServSys-1 and ServSys-2 (see above). ServSys-4: Local jurisdiction to require, review and approve the water supply analysis if in compliance with Mitigation Measure ServSys-4.</td>
<td>ServSys-1 and ServSys-2 (see above). ServSys-4: During environmental review for development projects.</td>
<td>ServSys-1 and ServSys-2 (see above). ServSys-4: Jurisdiction approving the project. Local water provider will play a role in the water supply analysis.</td>
</tr>
<tr>
<td>The increase in population may result in the need for new or expanded sewer/wastewater treatment facilities. This represents a potentially significant impact. General population growth within San Diego County would require expansion of sewer/wastewater treatment facilities, but implementation of the RCP further increases the need for new or expanded facilities.</td>
<td>ServSys-1 and ServSys-2 (see above).</td>
<td>ServSys-1 and ServSys-2 (see above).</td>
<td>ServSys-1 and ServSys-2 (see above).</td>
<td>ServSys-1 and ServSys-2 (see above).</td>
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<tr>
<td>The increase in population will result in the need for new or expanded sewer/wastewater treatment facilities. This represents a potentially significant impact. General population growth within San Diego County would require expansion of sewer/wastewater treatment facilities, but implementation of the RCP further increases the need for new or expanded facilities.</td>
<td>ServSys-1: (see above). ServSys-3: Recycled materials shall be used in future construction. ServSys-3: Jurisdictions will adopt policies which encourage the use of recycled materials.</td>
<td>ServSys-1: (see above). ServSys-3: During next General Plan Update</td>
<td>ServSys-1: (see above). ServSys-3: During next General Plan Update</td>
<td>ServSys-1 (see above). ServSys-3: Local jurisdictions.</td>
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<tr>
<td>The increase in population results in the need for new or expanded school facilities. This represents a significant impact. General population growth</td>
<td>ServSys-5: Future projects shall be required to pay School Mitigation Fees pursuant to California Education Code Section 17620 and Government Code</td>
<td>ServSys-5: Local jurisdiction to collect fees.</td>
<td>ServSys-5: Local jurisdiction to collect fees prior to issuance</td>
<td>ServSys-5: Future project applicants and local jurisdiction.</td>
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<td>within San Diego County would require the expansion of school facilities, but implementation of the RCP further increases the need for new or expanded facilities.</td>
<td>Section 65995. These fees will assist in funding school services within the applicable school district.</td>
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<td>of grading permits.</td>
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<td>The increase in population will require new and expanded police and sheriff facilities and additional police officers and sheriff’s deputies. This represents a significant impact. General population growth within San Diego County would require the expansion of police and sheriff services, but implementation of the RCP further increases the need for new or expanded facilities.</td>
<td>ServSys-6: Future projects shall be required to pay public facility finance fees in accordance with the requirements of the jurisdiction in which the project is proposed. These fees will assist in funding additional police, sheriff, and fire protection services, as well as expanding and park/recreation services.</td>
<td>ServSys-6: Local jurisdiction to collect fees.</td>
<td>ServSys-6: Local jurisdiction to collect fees prior to issuance of grading permits.</td>
<td>ServSys-6: Jurisdiction to collect fees prior to issuance of grading permits.</td>
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<tr>
<td>The increase in population will require new and expanded fire protection facilities and additional fire protection staff. This represents a significant impact. General population growth within San Diego County would require the expansion of fire protection services, but implementation of the RCP further increases the need for new or expanded services.</td>
<td>ServSys-6: (see above).</td>
<td>ServSys-6: (see above).</td>
<td>ServSys-6: (see above).</td>
<td>ServSys-6: (see above).</td>
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<td>The increase in population results in the need for additional park and recreation services. This represents a significant impact. General population growth within San Diego County would require the expansion of park and recreation facilities and services, but implementation of the RCP further increases the need for these new services.</td>
<td>ServSys-6: (see above).</td>
<td>ServSys-6: (see above).</td>
<td>ServSys-6: (see above).</td>
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Table 1  
Congestion Management Strategies

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<td>Transit System/Service Expansion</td>
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<td>System/Service Operational Improvements</td>
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<td>Increased Service Frequency</td>
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<td>Decreased Travel Time</td>
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<td>Station Amenities &amp; Public Transit Facility Improvements</td>
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<td>Development Around Transit Nodes</td>
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<td>Mixed-use Developments</td>
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<td>Locally Serving Commercial</td>
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<td>Interconnected Street Networks &amp; Pedestrian Facilities</td>
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<td>Transit/Alternative Modes Marketing</td>
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<td>Bicycle/Pedestrian Allowances</td>
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<td>Distributed &amp; Remote Work Centers/Video Conferencing</td>
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<td>Carpool/Vanpool/Transit Programs</td>
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<td>Carpool/Vanpool Subsidies</td>
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<td>Parking Restrictions/Reduced Minimums and Maximums/Area-Wide Caps</td>
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<td>Parking Charges &amp; Carpool/Vanpool Preferential Parking</td>
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<tr>
<td>Transit Pass Subsidies</td>
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<td>Guaranteed Ride Home Program</td>
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### Traffic Systems Management (TSM)
- Improved Traffic Control Devices
  - Traffic Signal Coordination
  - Adaptive Signal Control
  - Signal Improvements
- Local Traffic Management (Monitoring and Control) & Arterial Monitoring
- Special Event Management
- Incident Management
- Commercial Vehicle Restrictions
- Advanced Traveler Information
- Value/Congestion Pricing
- Peak Period On-Street Parking Restrictions

### Capital
- Park & Ride Lots (Transit)
- HOV/HOT Lanes/Access
- Roadway Widening
- Intersection Improvements
- Bicycle Facilities
- Pedestrian Facilities
- Bus Priority Treatments on Surface Streets
- Grade Separation/Urban Interchange